

Inspection Output (IOR)

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Report Filters

Assets All, and including items not linked to any asset.

Results All

Inspection Information

Inspection Name	8787 - Inland Empire O&M Review	Operator(s)	INLAND EMPIRE PAPER CO (8140)	Plan Submitted	12/13/2023
		Lead	Scott Anderson	Plan Approval	12/13/2023 by Dennis Ritter
Status	LOCKED	Team Members	Jason Hoxit	All Activity Start	06/03/2024
Start Year	2024	Observer(s)	David Cullom, Lex Vinsel, Anthony Dorrough, Derek Norwood, John Trier, Marina Rathbun, Tom Green	All Activity End	06/06/2024
System Type	GT	Supervisor	Dennis Ritter	Inspection Submitted	08/08/2024
Protocol Set ID	WA.GT.2023.02	Director	Scott Rukke	Inspection Approval	08/08/2024 by Scott Rukke

Inspection Summary

NOTE: Inspection Setup/pre-plan analysis is not used for this type of WA intrastate inspection.

Inspection Scope and Summary

This inspection was a review of Inland Empire Paper Company's Gas Operating Procedures (GOP), Emergency Response Manual (ERM), and Operation Qualification Manual (OQ Manual) for the Operations and Maintenance Plans and Procedures Review (O&M Review).

Facilities visited and Total AFOD

Facilities were not visited for the O&M Review. This inspection was 4 AFODs.

Summary of Significant Findings

No significant findings. There were no areas of concern or probable violations as a result of this inspection.

Primary Operator contacts and/or participants

Kevin Davis, Manager of Strategic Projects

Doug Krapas, Environmental Manager

Operator executive contact and mailing address for any official correspondence

Kevin Rasler, President

Inland Empire Paper Company

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Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1. 86256 (92)	Inland Empire	unit	86256	Compressor Stations Bottle/Pipe - Holders Vault	218	218	218	100.0%

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
				Service Line Gas Storage Field (Aboveground) Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric AMAOP CDA					

1. Percent completion excludes unanswered questions planned as "always observe".

Plans

Plan # Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent Notes
1. 86256 (92)	WUTC O&M Inspection	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, 114, GENERIC	P, R, O, S	Detail --

Plan Implementations

Activity # Name	SMART Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1. O&M	--	06/03/2024 06/06/2024	WUTC O&M Inspection	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, 114, GENERIC	all assets	all types	218	218	218	218	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

2. Percent completion excludes unanswered questions planned as "always observe".

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	O&M	COMPLETED	07/22/2024	O&M	86256 (92)

Results (all values, 218 results)

240 (instead of 218) results are listed due to re-presentation of questions in more than one sub-group.

AR.PTI: Integrity Assessment Via Pressure Test

- Question Result, ID, Sat, AR.PTI.PRESSTESTACCEP.P, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d), 192.921(a)(2))

Question Text *Were test acceptance criteria and processes sufficient to assure the basis for an acceptable pressure test?*

Assets Covered 86256 (92)

Result Notes GOP Section 6.09 includes test acceptance criteria and processes. GOP Section 6.09.9 includes the retention of all pressure test records for the life of the pipeline.

AR.RMP: Repair Methods and Practices

2. Question Result, ID, References **Sat, AR.RMP.SAFETY.P, 192.605(b)(9) (192.713(b))**
 Question Text *Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property?*
 Assets Covered **86256 (92)**
 Result Notes **ERM Section 1.1 complies with the requirements of WAC 480-93-180(1) and WAC 480-93-180(3). ERM Section 4.0, 1-7, includes adequate precautions to protect personnel in accordance with CFR § 192.605(b)(9).**
3. Question Result, ID, References **Sat, AR.RMP.IGNITION.P, 192.605(b)(1) (192.751(a), 192.751(b), 192.751(c))**
 Question Text *Is there a process for preventing accidental ignition where gas presents a hazard of fire or explosion?*
 Assets Covered **86256 (92)**
 Result Notes **ERM Section 2.3, ERM Section 4.0, and ERM Section 5.1.**
4. Question Result, ID, References **NA, AR.RMP.HOTTAP.P, 192.605(b)(1) (192.627)**
 Question Text *Is the process adequate for tapping pipelines under pressure?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 6.16 states the company's policy is that the feeder main pipeline will not be tapped under pressure.**
5. Question Result, ID, References **Sat, AR.RMP.REPAIRREQT.P, 192.605(b)(1) (192.711(a), 192.711(b), 192.711(c), 192.717(b)(3))**
 Question Text *Does the repair process capture the requirements of 192.711 for transmission lines?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 3.04.**
6. Question Result, ID, References **Sat, AR.RMP.FIELDREPAIRDEFECT.P, 192.605(b)(1) (192.713(a), 192.713(b))**
 Question Text *Is the process adequate for the permanent field repair of defects in transmission lines?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 3.04.**
7. Question Result, ID, References **Sat, AR.RMP.FIELDREPAIRWELDS.P, 192.605(b) (192.715(a), 192.715(b), 192.715(c))**
 Question Text *Is the process adequate for the permanent field repair of welds?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 6.06.4.2; GOP Section 6.06.4.4; GOP Section 6.06.4.6; GOP Section 6.06.4.9; GOP Section 6.06.4.11; and GOP Section 6.06.4.12, include procedures for cleaning, preheating, removing and repairing weld defects, and inspecting weld repairs in compliance with CFR § 192.715 and CFR § 192.245. GOP Section 3.04 discusses welding a full encirclement split sleeve on either side of a damaged area in accordance with CFR § 192.715(c).**
8. Question Result, ID, References **Sat, AR.RMP.FIELDREPAIRLEAK.P, 192.605(b) (192.717(a), 192.717(b))**
 Question Text *Is there an adequate process for the permanent field repair of leaks on transmission lines?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 3.04 and GOP Section 6.09.4.**
9. Question Result, ID, References **Sat, AR.RMP.WELDTTEST.P, 192.605(b) (192.719(a), 192.719(b))**
 Question Text *Is the process adequate for the testing of replacement pipe and repairs made by welding on transmission lines?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 6.09.**

DC.CO: Construction

10. Question Result, ID, References **Sat, DC.CO.INSPECTGEN.P, 192.303 (192.305)**

- Question Text *Does the process require the pipeline to be inspected to ensure that it is constructed in accordance with Part 192?*
 Assets Covered 86256 (92)
 Result Notes GOP Section 6.10.
11. Question Result, ID, Sat, DC.CO.CASING.P, 192.303 (192.323(a), 192.323(b), 192.323(c), 192.323(d), 192.467(a),
 References 192.467(b))
 Question Text *Does the process require railroad or highway casings to be in accordance with the requirements of 192.323?*
 Assets Covered 86256 (92)
 Result Notes GOP Section 6.10.1.
12. Question Result, ID, NA, DC.CO.NONWELDJOINT.P, 192.303 (192.273(a), 192.273(b), 192.273(c)) (also presented in:
 References DC.PLASTIC)
 Question Text *Does the process require that pipeline joints (to be made other than by welding) be designed and installed in accordance with 192.273?*
 Assets Covered 86256 (92)
 Result Notes The company only uses welding to join pipe.
13. Question Result, ID,
 References Sat, DC.CO.SPECS.P, 192.303
 Question Text *Does the operator have written construction specifications or standards as required of 192.303?*
 Assets Covered 86256 (92)
 Result Notes GOP Section 6.10.
14. Question Result, ID,
 References Sat, DC.CO.INSPECTVISUAL.P, 192.303 (192.307)
 Question Text *Does the process require pipe and other components to be visually inspected prior to installation?*
 Assets Covered 86256 (92)
 Result Notes GOP Section 6.10.1.
15. Question Result, ID,
 References Sat, DC.CO.REPAIR.P, 192.303 (192.309, 192.493)
 Question Text *Does the process require repairs to steel pipe in accordance with §192.309?*
 Assets Covered 86256 (92)
 Result Notes GOP Section 3.04.
16. Question Result, ID,
 References Sat, DC.CO.FIELD BEND.P, 192.303 (192.313(a), 192.313(b), 192.313(c), 192.315(a))
 Question Text *Does the process require field bends to be made in accordance with 192.313?*
 Assets Covered 86256 (92)
 Result Notes GOP Section 6.07.
17. Question Result, ID,
 References NA, DC.CO.WRINKLEBEND.P, 192.303 (192.315(a), 192.315(b))
 Question Text *Does the process require that wrinkle bends are made in accordance with 192.315?*
 Assets Covered 86256 (92)
 Result Notes GOP Section 6.07.3 does not allow wrinkle bends.
18. Question Result, ID,
 References Sat, DC.CO.HAZARD.P, 192.303 (192.317(a), 192.317(b), 192.317(c), 192.103, ADB-2022-01)
 Question Text *Does the operator have written specifications requiring transmission line or main be protected from hazards in accordance with 192.317?*
 Assets Covered 86256 (92)
 Result Notes GOP Section 2.02.
19. Question Result, ID,
 References Sat, DC.CO.INSTALL.P, 192.303 (192.319(a), 192.319(b))
 Question Text *Does the process require that piping be installed such that stresses are minimized and the coating is protected?*
 Assets Covered 86256 (92)

Result Notes [GOP Section 6.11.](#)

20. Question Result, ID, [Sat, DC.CO.CLEARANCE.P, 192.303 \(192.325\(a\), 192.325\(b\), 192.325\(c\), 192.325\(d\)\)](#) (also presented References in: [DC.PLASTIC](#))
Question Text *Does the process require pipe to be installed with clearances specified in 192.325 and (if plastic) installed as to prevent heat damage to the pipe?*
Assets Covered [86256 \(92\)](#)
Result Notes [GOP Section 3.09, 4, requires a minimum clearance of 12 inches between the steel transmission line and any other utility facilities in accordance with CFR § 192.325. WAC 480-93-178 is not applicable, as the company does not utilize plastic pipelines.](#)
21. Question Result, ID, [Sat, DC.CO.COVERONSHORE.P, 192.303 \(192.327\(a\), 192.327\(b\), 192.327\(c\), 192.327\(d\), 192.327\(e\)\)](#)
References
Question Text *Does the process specify that onshore piping is to be installed with a depth of cover as specified in 192.327?*
Assets Covered [86256 \(92\)](#)
Result Notes [GOP Section 6.04.2.](#)

DC.WELDINSPECTION: Construction Weld Inspection

22. Question Result, ID, [Sat, DC.WELDINSPECTION.WELDVISUALQUAL.P, 192.241 \(192.225, 192.227, 192.229, 192.231, 192.233, 192.243, 192.245\)](#)
References
Question Text *Does the operator have comprehensive written specifications or procedures for the inspection and testing of welds that meet the requirements of 192.241?*
Assets Covered [86256 \(92\)](#)
Result Notes [GOP Section 6.06.](#)
23. Question Result, ID, [Sat, DC.WELDINSPECTION.WELDNDT.P, 192.243](#)
References
Question Text *Is there a process for nondestructive testing and interpretation in accordance with 192.243?*
Assets Covered [86256 \(92\)](#)
Result Notes [GOP Section 6.06.4.14.](#)
24. Question Result, ID, [Sat, DC.WELDINSPECTION.WELDREPAIR.P, 192.245 \(192.303\)](#)
References
Question Text *Does the process require welds that are unacceptable to be removed and/or repaired as specified by 192.245?*
Assets Covered [86256 \(92\)](#)
Result Notes [GOP Section 6.06.4.9 and GOP Section 6.06.4.11.](#)

DC.WELDPROCEDURE: Construction Welding Procedures

25. Question Result, ID, [Sat, DC.WELDPROCEDURE.WELD.P, 192.225](#)
References
Question Text *Does the operator have written specifications requiring qualified welding procedures in accordance with 192.225?*
Assets Covered [86256 \(92\)](#)
Result Notes [GOP Section 3.05 and GOP Section 6.06.](#)
26. Question Result, ID, [Sat, DC.WELDPROCEDURE.WELDERQUAL.P, 192.227 \(192.225, 192.229\)](#)
References
Question Text *Do the written specifications require welders to be qualified in accordance with applicable sections of API Standard 1104 or ASME BPVC, Section IX and cover the limitations in §192.229?*
Assets Covered [86256 \(92\)](#)
Result Notes [GOP Section 6.06.3 requires its welders to be qualified in accordance with Section 6 of API Standard 1104.](#)
27. Question Result, ID, [Sat, DC.WELDPROCEDURE.WELDWEATHER.P, 192.231 \(192.225, 192.227\)](#)
References
Question Text *Does the operator have written specifications that require the welding operation to be protected from weather conditions that would impair the quality of the completed weld?*

Assets Covered 86256 (92)

Result Notes GOP Section 6.06.4.3 does not permit welding when the quality of the completed weld would be impaired by the prevailing weather conditions, and allows the use of windshields when practical.

28. Question Result, ID, NA, DC.WELDPROCEDURE.MITERJOINT.P, 192.233
References

Question Text *Does the operator have written specifications or procedures that prohibit the use of certain miter joints as required by 192.233?*

Assets Covered 86256 (92)

Result Notes GOP Section 6.06.4.2 does not permit the use of miter joints.

29. Question Result, ID, Sat, DC.WELDPROCEDURE.WELDPREP.P, 192.235
References

Question Text *Does the operator have comprehensive written specifications or procedures that require preparations for welding in accordance with 192.235?*

Assets Covered 86256 (92)

Result Notes GOP Section 6.06.4.2.

DC.DP: Design of Pipe

30. Question Result, ID, NA, DC.DP.PIPEDESGEN.P, 192.103 (192.105, 192.107, 192.109, 192.111, 192.112, 192.115, 192.121, 192.123, 192.125, 192.303, 192.305, 192.307)
References

Question Text *Does the operator have specifications in place for pipe design so that the wall thickness is sufficient or installed with adequate protection to withstand external pressures and loads that will be imposed on the pipe after installation?*

Assets Covered 86256 (92)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. The company does not install new pipe and has not had to replace existing pipe. If this condition were to occur, they would hire an engineering company and add these sections to their manual as referenced in GOP Section 2.01 and GOP Section 2.11.

31. Question Result, ID, NA, DC.DP.PIPEDESMAOP.P, 192.105 (192.103, 192.107, 192.109, 192.111, 192.113, 192.115, 192.121, 192.123, 192.125, 192.303, 192.305, 192.307)
References

Question Text *Does the operator have written procedures in place for steel pipe design so that the wall thickness is sufficient for the intended maximum operating pressure as required by 192.105?*

Assets Covered 86256 (92)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. The company does not install new pipe and has not had to replace existing pipe. If this condition were to occur, they would hire an engineering company and add these sections to their manual as referenced in GOP Section 2.01 and GOP Section 2.11.

32. Question Result, ID, NA, DC.DP.PIPEDESFACTOR.P, 192.111 (192.103, 192.105, 192.107, 192.109, 192.112, 192.115, 192.121, 192.123, 192.125, 192.303, 192.305, 192.307)
References

Question Text *Does the operator have written procedures for determining the Design Factor to be used for steel pipe as required by 192.111?*

Assets Covered 86256 (92)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. The company does not install new pipe and has not had to replace existing pipe. If this condition were to occur, they would hire an engineering company and add these sections to their manual as referenced in GOP Section 2.01 and GOP Section 2.11.

DC.DPCOPP: Design of Pipe - Overpressure Protection

33. Question Result, ID, Sat, DC.DPCOPP.OVERPRESSURE.P, 192.303 (192.143(b), 192.195(a), 192.199(a), 192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h), 192.201(a), 192.201(b), 192.201(c), 192.143(a))
References

Question Text *Does the process require the pipeline have pressure relieving or pressure limiting devices that are required of 192.195(a), and that they meet the requirements of 192.199 and 192.201?*

Assets Covered 86256 (92)

Result Notes GOP Section 2.03 and GOP Section 4.06.

34. Question Result, ID, Sat, DC.DPCOPP.PRESSLIMIT.P, 192.303 (192.143(b), 192.199(a), 192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h), 192.143(a))
References

Question Text *Does the process require that pressure relieving or pressure limiting devices meet the requirements of 192.199?*

Assets Covered 86256 (92)

Result Notes GOP Section 2.03.

35. Question Result, ID, References Sat, DC.DPCOPP.PRESSLIMITCAP.P, 192.201(a) (192.143(a), 192.143(b), 192.201(b), 192.201(c))

Question Text *Does the process require that pressure relief or pressure limiting stations being installed comply with 192.201?*

Assets Covered 86256 (92)

Result Notes GOP Section 2.03.

36. Question Result, ID, References Sat, DC.DPCOPP.MULTISTAGE.P,

Question Text *Does the process require that the operator install multistage regulator equipment consistent with the requirements in WAC 480-93-130?*

Assets Covered 86256 (92)

Result Notes GOP Section 1.01.

DC.DPC: Design of Pipe Components

37. Question Result, ID, References NA, DC.DPC.METALCOMPONENT.P, 192.144 (192.607)

Question Text *Do the procedures require certain metallic components to be qualified for use in accordance with 192.144?*

Assets Covered 86256 (92)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. The company does not install new pipe and has not had to replace existing pipe. If this condition were to occur, they would hire an engineering company and add these sections to their manual as referenced in GOP Section 2.01 and GOP Section 2.11.

38. Question Result, ID, References NA, DC.DPC.VALVE.P, 192.145 (192.145(a), 192.145(b), 192.145(c), 192.145(d), 192.145(e), 192.145(f), 192.607)

Question Text *Do the procedures require that valves comply with the requirements of §192.145?*

Assets Covered 86256 (92)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. The company does not install new pipe and has not had to replace existing pipe. If this condition were to occur, they would hire an engineering company and add these sections to their manual as referenced in GOP Section 2.01 and GOP Section 2.11.

39. Question Result, ID, References NA, DC.DPC.FLANGE.P, 192.147 (192.147(a), 192.147(b), 192.147(c), 192.607)

Question Text *Do the procedures require that flanges and flange accessories meet the requirements of §192.147?*

Assets Covered 86256 (92)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. The company does not install new pipe and has not had to replace existing pipe. If this condition were to occur, they would hire an engineering company and add these sections to their manual as referenced in GOP Section 2.01 and GOP Section 2.11.

40. Question Result, ID, References NA, DC.DPC.STANDARDFITTING.P, 192.149(a) (192.149(b), 192.143(a), 192.143(b), 192.607)

Question Text *Do procedures require that standard fittings are in compliance with §192.149?*

Assets Covered 86256 (92)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. The company does not install new pipe and has not had to replace existing pipe. If this condition were to occur, they would hire an engineering company and add these sections to their manual as referenced in GOP Section 2.01 and GOP Section 2.11.

41. Question Result, ID, References Sat, DC.DPC.ILIPASS.P, 192.103 (192.150(a), 192.150(c))

Question Text *Does the process require that certain transmission pipeline components are designed and constructed to accommodate the passage of instrumented internal inspection devices?*

Assets Covered 86256 (92)

Result Notes **GOP Section 2.11.**

42. Question Result, ID, References **NA, DC.DPC.TAP.P, 192.143 (192.151(a), 192.151(b), 192.151(c))**
Question Text *Does the process require pipeline hot taps (or taps) and tapping fittings to comply with the requirements of 192.151?*
Assets Covered **86256 (92)**
Result Notes **Under GOP Section 6.16, it is the company's policy that the feeder main pipeline will not be tapped under pressure.**
43. Question Result, ID, References **Sat, DC.DPC.WELDFABRICATE.P, 192.143(a) (192.153(a), 192.153(b), 192.153(c), 192.153(d))**
Question Text *Does the process require components fabricated by welding, such as branch connections, assemblies of standard pipe, or prefabricated units utilized in the construction of a pipeline, are to be in accordance with 192.153?*
Assets Covered **86256 (92)**
Result Notes **GOP Section 3.04.**
44. Question Result, ID, References **NA, DC.DPC.EXTRUDEOUTLET.P, 192.149(b) (192.157)**
Question Text *Does the process require each extruded outlet to be suitable for anticipated service conditions and designed in accordance to §192.157?*
Assets Covered **86256 (92)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
45. Question Result, ID, References **NA, DC.DPC.FLEXIBLE.P, 192.143(a) (192.159)**
Question Text *Does the process require pipeline and pipe components to be designed for flexibility in accordance with §192.159?*
Assets Covered **86256 (92)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review. The company does not install new pipe and has not had to replace existing pipe. If this condition were to occur, they would hire an engineering company and add these sections to their manual as referenced in GOP Section 2.01 and GOP Section 2.11.**
46. Question Result, ID, References **NA, DC.DPC.SUPPORT.P, 192.161**
Question Text *Does the process require piping and associated equipment to have sufficient anchors or supports to prevent undue strain on connected equipment, resist longitudinal forces, and prevent or dampen excessive vibration in accordance with §192.161?*
Assets Covered **86256 (92)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
47. Question Result, ID, References **Sat, DC.DPC.VALVESPACE.P, 192.143 (192.179(a), 192.179(a)(1), 192.179(a)(2), 192.179(a)(3), 192.179(a)(4), 192.179(b), 192.179(c), 192.179(d), 192.179(e), 192.179(f), 192.179(g), 192.179(h))**
Question Text *Does the process require transmission line valve spacing to be accordance with §192.179(a)?*
Assets Covered **86256 (92)**
Result Notes **GOP Section 1.01 and GOP Section 4.05.**
48. Question Result, ID, References **NA, DC.DPC.INSTRUMENTPIPE.P, 192.143(a) (192.143(b), 192.203(a), 192.203(b))**
Question Text *As applicable to the project, does the process require that instrument, control, and sampling pipe and components are to be designed in accordance with 192.203?*
Assets Covered **86256 (92)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
49. Question Result, ID, References **Sat, DC.DPC.INTCORRODE.P, 192.453 (192.476(a), 192.476(b), 192.476(c))**
Question Text *Does the process require that the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476?*
Assets Covered **86256 (92)**
Result Notes **GOP Section 3.11.**

50. Question Result, ID, References **Sat, DC.DPC.CCROTCOATSURFPREP.P, 192.143(b) (192.461(a), 192.303, 192.309(a))**
 Question Text *Do the procedures and/or written specifications stipulate that each protective coating applied for the purpose of external corrosion control must be applied on a properly prepared surface?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 6.08.01.**
51. Question Result, ID, References **Sat, DC.DPC.CCROTCOATPROP.P, 192.143(b) (192.461(a)(2), 192.461(a)(3), 192.461(a)(4), 192.461(a)(5), 192.461(b))**
 Question Text *Do the operator's written specifications stipulate that each protective coating applied for the purpose of external corrosion control will have sufficient adhesion to the metal surface to effectively resist underfilm migration of moisture; sufficient ductility to resist cracking; sufficient strength to resist damage due to handling and soil stress; properties compatible with any supplemental cathodic protection; and, electrically insulating type with low moisture absorption and high electrical resistance?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 6.08.1.**
52. Question Result, ID, References **Sat, DC.DPC.CCROTCOATLOWER.P, 192.143(b) (192.461(c)) (also presented in: DC.CO)**
 Question Text *Do written specifications stipulate that each external protective coating must be inspected just prior to lowering the pipe into the ditch and backfilling, and any damage detrimental to effective corrosion control must be repaired?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 3.09 includes procedures for inspecting exposed pipeline coatings. GOP Section 6.08.1 includes procedures for repairing external coatings if damage is discovered. GOP Section 6.10 includes procedures to inspect coating during installation.**
53. Question Result, ID, References **Sat, DC.DPC.CCROTCOATINGINDITCH.P, 192.143(b) (192.461(d))**
 Question Text *Do operator's written specifications stipulate that each external protective coating must be protected from damage resulting from adverse ditch conditions or damage from supporting blocks?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 3.09, GOP Section 6.04.3, GOP Section 6.08.1, and GOP Section 6.10.1.**
54. Question Result, ID, References **Sat, DC.DPC.CCROTCOATBORING.P, 192.143(b) (192.461(e))**
 Question Text *Do operator's written specifications stipulate that precautions must be taken to minimize damage to the coating during installation, if coated pipe is installed by boring, driving, or other similar method?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 6.03.6, GOP Section 6.08.1, and GOP Section 6.10.1.**
55. Question Result, ID, References **Sat, DC.DPC.CORROSIONQUAL.P, 192.303 (192.143(b), 192.453)**
 Question Text *Do the operator's written specifications stipulate that the design and installation of cathodic protection systems, must be carried out by, or under the direction of, a person qualified in pipeline corrosion control methods?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 2.08.**
56. Question Result, ID, References **Sat, DC.DPC.CCCATHPROTDES.P, 192.463(a) (192.143(b), ADB-2003-06)**
 Question Text *Do operator's written specifications stipulate that the cathodic protection system must be designed and installed to comply with one or more of the applicable criteria contained in Appendix D of Part 192?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 3.11.**
57. Question Result, ID, References **Sat, DC.DPC.CCCATHPROTLEVEL.P, 192.303 (192.143, 192.463(c))**
 Question Text *Do the operator's written specifications stipulate that amount of cathodic protection must be designed so as not to damage the protective coating or the pipe?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 6.08.1.**

58. Question Result, ID, References **Sat, DC.DPC.CCELECTRICALISOL.P, 192.467(c) (192.143(b))**
 Question Text *Do operator's written specifications stipulate that each pipeline must be electrically isolated from metallic casings that are a part of the underground system?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 3.11.**
59. Question Result, ID, References **Sat, DC.DPC.CCELECTRISOLSTRUCT.P, 192.143(b) (192.467(a), 192.467(b), 192.467(d), 192.467(e), 192.467(f), NACE RP0169, NACE SP0200-2008)**
 Question Text *Do written specifications stipulate that each buried or submerged pipeline must be electrically isolated from other underground metallic structures?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 3.11.**
60. Question Result, ID, References **Sat, DC.DPC.CCEXTRNLPROT.P, 192.303 (192.143(b), 192.455(a))**
 Question Text *Do the written specifications stipulate that each buried or submerged pipeline installed after July 31, 1971, must be protected against external corrosion within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 3.09, GOP Section 3.11, and GOP Section 6.08.1.**

DC.MO: Maintenance and Operations

61. Question Result, ID, References **Sat, DC.MO.ICEXAMINE.P, 192.605(b) (192.475(a), 192.475(b), 192.475(c))**
 Question Text *Does the process direct personnel to examine removed pipe for evidence of internal corrosion?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 2.02 and GOP Section 3.09.**
62. Question Result, ID, References **Sat, DC.MO.MAOPLIMIT.P, 192.605(b)(5)**
 Question Text *Does the process include procedures for starting up and shutting down any part of the pipeline system in a manner designed to assure operation within the MAOP limits prescribed by Part 192, plus the build-up allowed for operation of pressure-limiting and control devices?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 2.05 and GOP Section 3.06.**
63. Question Result, ID, References **NA, DC.MO.HOTTAP.P, 192.605(b) (192.627)**
 Question Text *Are there processes for tapping pipelines under pressure?*
 Assets Covered **86256 (92)**
 Result Notes **Under GOP Section 6.16, it is the company's policy that the feeder main pipeline will not be tapped under pressure.**

DC.MA: Materials

64. Question Result, ID, References **Sat, DC.MA.GEN.P, 192.53 (192.55, 192.59, 192.63)**
 Question Text *Does the operator have written specifications or procedures that require that materials for pipe and components meet the requirements of 192.53?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 6.01.1.**
65. Question Result, ID, References **Sat, DC.MA.STEELPIPE.P, 192.55 (192.53)**
 Question Text *Does the operator have written procedures or specifications that require steel pipe be qualified for use under Part 192 according to 192.55? (see considerations for requirements of 192.55)*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 6.01.1.**

66. Question Result, ID, References **Sat, DC.MA.MARKING.P, 192.63** (also presented in: DC.PLASTIC)
 Question Text *Does the operator have specifications requiring pipe, valves, and fittings to be marked according to the requirements of §192.63?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 6.01.6.**

DC.PT: Pressure Testing

67. Question Result, ID, References **Sat, DC.PT.PRESSTEST.P, 192.605(b) (192.303, 192.503(a), 192.503(b), 192.503(c), 192.503(d), 192.503(e))** (also presented in: DC.PTLOWPRESS)
 Question Text *Does the process require pressure testing to be conducted for new segments of pipeline, or return to service segments of pipeline that are being relocated or replaced?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 6.09.1 and GOP Section 6.09.8.**
68. Question Result, ID, References **NA, DC.PT.PRESSTESTHIGHSTRESS.P, 192.505(a) (192.143(a), 192.505(b), 192.505(c), 192.505(d), 192.143(b), 192.143(c))**
 Question Text *Does the process require that, as applicable to the project, sections of a pipeline operating at a hoop stress equal to or greater than 30% of SMYS be strength tested in accordance with the requirements of 192.505?*
 Assets Covered **86256 (92)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. The company does not operate any pipelines at or above 30% SMYS.**
69. Question Result, ID, References **Sat, DC.PT.PRESSTESTENVIRON.P, 192.515(b) (192.629(a), 192.629(b))** (also presented in: DC.SPT, DC.PTLOWPRESS)
 Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, the test medium will be disposed of in a manner that will minimize damage to the environment?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 6.09.6.**
70. Question Result, ID, References **Sat, DC.PT.PRESSTESTSAFETY.P, 192.515(a) (192.629(a), 192.629(b))** (also presented in: DC.SPT, DC.PTLOWPRESS)
 Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 1.01.**
71. Question Result, ID, References **Sat, DC.PT.PRESSTESTRECORD.P, 192.517(a) (192.517(b))** (also presented in: DC.SPT, DC.PTLOWPRESS)
 Question Text *Does the process require that, as applicable to the project, creation and retention of a record of each Subpart J test for the required duration?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 6.09.9.**
72. Question Result, ID, References **Sat, DC.PT.EQUIPMENTCALIBRATION.P,**
 Question Text *Does the process ensure that pressure testing equipment is maintained and calibrated at appropriate intervals in accordance with the manufacturer’s recommendations?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 6.09.8.**

DC.PTLOWPRESS: Pressure Testing - Low Pressure

73. Question Result, ID, References **Sat, DC.PTLOWPRESS.PRESSTESTLOWSTRESS.P, 192.507 (192.505, 192.515, ANSI/GPTC Z380.1-2018 Appendix G-192-9)**

Question Text *Does the process require that, as applicable to the project, sections of a pipeline operating at a hoop stress less than 30% of SMYS and at or above 100 psig be tested in accordance with the requirements of 192.507?*

Assets Covered 86256 (92)

Result Notes [GOP Section 6.09.1](#) and [GOP Section 6.09.8](#).

DC.TQ: Training and Qualification

74. Question Result, ID, References [Sat, DC.TQ.OQCONSTMAINT.P, 192.805\(a\)](#) (192.493, Operators OQ program manual)

Question Text *Does the process include covered tasks relating to "construction-type" maintenance?*

Assets Covered 86256 (92)

Result Notes [GOP Section 3.05](#).

DC.PLASTIC: Plastic Pipe Construction

75. Question Result, ID, References [NA, DC.PLASTIC.DESIGNPRESSPLASTIC.P, 192.121](#)

Question Text *Does the process require the design pressure for plastic pipe to be determined in accordance with the formulas in §192.121?*

Assets Covered 86256 (92)

Result Notes [No such relevant facilities/equipment existed in the scope of inspection review.](#)

76. Question Result, ID, References [NA, DC.PLASTIC.PLASTICSPECS.P, 192.53](#) (192.59)

Question Text *Does the operator have specifications that require plastic pipe meet the requirements of 192.53, 192.59, and other applicable requirements of this sub-part?*

Assets Covered 86256 (92)

Result Notes [No such relevant facilities/equipment existed in the scope of inspection review.](#)

77. Question Result, ID, References [NA, DC.PLASTIC.PLASTICFITTING.P, 192.143\(c\)](#) (192.149(c))

Question Text *Does the process require plastic components and fittings are able to withstand operating pressures and other anticipated loads in accordance with a listed specification?*

Assets Covered 86256 (92)

Result Notes [No such relevant facilities/equipment existed in the scope of inspection review.](#)

78. Question Result, ID, References [NA, DC.PLASTIC.PLASTICJOINT.P, 192.303](#) (192.281(a), 192.281(b), 192.281(c), 192.281(d), 192.281(e))

Question Text *Does the process require plastic pipe joints to be designed and installed in accordance with 192.281?*

Assets Covered 86256 (92)

Result Notes [No such relevant facilities/equipment existed in the scope of inspection review.](#)

79. Question Result, ID, References [NA, DC.PLASTIC.PLASTICJOINTPROCEDURE.P, 192.283\(a\)](#) (192.283(b), 192.283(c))

Question Text *Does the process require plastic pipe joining procedures to be qualified in accordance with 192.283, prior to making plastic pipe joints?*

Assets Covered 86256 (92)

Result Notes [No such relevant facilities/equipment existed in the scope of inspection review.](#)

80. Question Result, ID, References [NA, DC.PLASTIC.PLASTICJOINTQUAL.P, 192.285\(d\)](#) (192.285(a), 192.285(b), 192.285(c), 192.285(e), 192.805)

Question Text *Is a process in place to ensure that personnel making joints in plastic pipelines are qualified?*

Assets Covered 86256 (92)

Result Notes [No such relevant facilities/equipment existed in the scope of inspection review.](#)

81. Question Result, ID, References [NA, DC.PLASTIC.PLASTICJOINTINSP.P, 192.287](#) (192.805(h))

Question Text *Is a process in place to assure that persons who inspect joints in plastic pipes are qualified?*

Assets Covered 86256 (92)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

82. Question Result, ID, NA, DC.PLASTIC.INSTALLPLASTIC.P, 192.303 (192.321(a), 192.321(b), 192.321(c), 192.321(d),
References 192.321(e), 192.321(f), 192.321(g), 192.321(h), 192.321(i))

Question Text *Does the process require that plastic pipe be installed as required by §192.321?*

Assets Covered 86256 (92)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

83. Question Result, ID, NA, DC.PLASTIC.REPAIRPLASTIC.P, 192.303 (192.311)
References

Question Text *Does the process require imperfections or damage of plastic pipe to be repaired or removed?*

Assets Covered 86256 (92)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

84. Question Result, ID, NA, DC.PLASTIC.PRESSTESTPLASTIC.P, 192.513(a) (192.143(a), 192.121(a), 192.513(b), 192.513(c),
References 192.513(d), 192.143(b), 192.143(c), 192.121(b), 192.121(c), 192.121(d), 192.121(e), 192.121(f))

Question Text *Does the process require that, as applicable to the project, sections of a plastic pipeline must be tested in accordance with the requirements of 192.513?*

Assets Covered 86256 (92)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

EP.ERG: Emergency Response

85. Question Result, ID, Sat, EP.ERG.REVIEW.P, 192.605(a) (192.9(d), 192.9(e),)
References

Question Text *Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?*

Assets Covered 86256 (92)

Result Notes GOP Section 3.13.

86. Question Result, ID, Sat, EP.ERG.INCIDENTDATA.P, 192.605(b)(4) (191.5(a), 192.9(d), 192.9(e))
References

Question Text *Does the process include the steps necessary for the gathering of data needed for reporting incidents under Part 191 of this chapter in a timely and effective manner?*

Assets Covered 86256 (92)

Result Notes ERM Section 10.1.

87. Question Result, ID, Sat, EP.ERG.NOTICES.P, 192.615(a)(1) (192.9(d), 192.9(e))
References

Question Text *Does the emergency plan include procedures for receiving, identifying, and classifying notices of events which need immediate response?*

Assets Covered 86256 (92)

Result Notes ERM Section 10.1.

88. Question Result, ID, Sat, EP.ERG.COMMSYS.P, 192.615(a) (192.615(a)(2), 192.9(d), 192.9(e))
References

Question Text *Does the emergency plan include procedures for establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials?*

Assets Covered 86256 (92)

Result Notes ERM Section 4.0 and ERM Section 5.1.

89. Question Result, ID, Sat, EP.ERG.RESPONSE.P, 192.615(a) (192.615(a)(3), 192.615(a)(11), 192.615(b)(1), 192.9(d),
References 192.9(e))

Question Text *Does the emergency plan include procedures for making a prompt and effective response to a notice of each type of emergency, including gas detected inside or near a building, a fire or explosion near or directly involving a pipeline facility, operational failure (including Cyber-attacks), or a natural disaster?*

Assets Covered 86256 (92)

Result Notes ERM Section 2.4, ERM Section 4.0, and ERM Section 5.0.

90. Question Result, ID, Sat, EP.ERG.READINESS.P, 192.615(a) (192.615(a)(4), 192.9(d), 192.9(e))
References

- Question Text *Does the process include procedures for ensuring the availability of personnel, equipment, tools, and materials as needed at the scene of an emergency?*
- Assets Covered 86256 (92)
- Result Notes ERM Section 4.0, ERM Section 5.0, ERM Section 6.0, ERM Section 7.0, and ERM Section 9.3
91. Question Result, ID, References Sat, EP.ERG.PUBLICPRIORITY.P, 192.615(a) (192.615(a)(5), 192.9(d), 192.9(e))
- Question Text *Does the emergency plan include procedures for taking actions directed toward protecting people first and then property?*
- Assets Covered 86256 (92)
- Result Notes ERM Section 1.1 and ERM Section 5.0.
92. Question Result, ID, References Sat, EP.ERG.PRESSREDUCESD.P, 192.615(a) (192.615(a)(6), 192.9(d), 192.9(e))
- Question Text *Does the emergency plan include procedures for the emergency shutdown, valve shut-off, or pressure reduction in any section of pipeline system necessary to minimize hazards to life or property?*
- Assets Covered 86256 (92)
- Result Notes ERM Section 3.1 and ERM Section 5.1.
93. Question Result, ID, References Sat, EP.ERG.PUBLICHAZ.P, 192.605(a) (192.615(a)(7), 192.9(d), 192.9(e))
- Question Text *Does the emergency plan include procedures for making safe any actual or potential hazard to life or property?*
- Assets Covered 86256 (92)
- Result Notes ERM Section 1.1, ERM Section 1.2, and ERM Section 4.0,
94. Question Result, ID, References Sat, EP.ERG.AUTHORITIES.P, 192.615(a) (192.615(a)(8), 192.9(d), 192.9(e))
- Question Text *Does the emergency plan include procedures for notifying appropriate public safety answering point (911) of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency?*
- Assets Covered 86256 (92)
- Result Notes ERM Section 4.0, ERM Section 5.1, and ERM Section 9.3.
95. Question Result, ID, References Sat, EP.ERG.NOTIFY911.P, 192.615(a) (192.615(a)(8), 192.9(d), 192.9(e), NTSB P-11-9)
- Question Text *Does the emergency plan define the operator's designated person(s) (e.g., controller or other personnel) responsible to directly notify 911 or the phone number of appropriate local emergency officials to report emergencies and possible pipeline ruptures to first responder agencies/authorities?*
- Assets Covered 86256 (92)
- Result Notes ERM Section 3.1, ERM Section 4.0, and ERM Section 5.1.
96. Question Result, ID, References Sat, EP.ERG.OUTAGERESTORE.P, 192.615(a) (192.615(a)(9), 192.9(d), 192.9(e))
- Question Text *Does the emergency plan include procedures for safely restoring any service outage?*
- Assets Covered 86256 (92)
- Result Notes ERM Section 1.3, ERM Section 5.1, and GOP Section 3.06.
97. Question Result, ID, References Sat, EP.ERG.POSTEVTREVIEW.P, 192.615(b)(3) (192.9(d), 192.9(e))
- Question Text *Does the process include detailed steps for reviewing employee activities to determine whether the procedures were effectively followed in each emergency?*
- Assets Covered 86256 (92)
- Result Notes ERM Section 11.5.
98. Question Result, ID, References Sat, EP.ERG.LIAISON.P, 192.615(a)(2) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), 192.9(d), 192.9(e), ADB-2005-03)
- Question Text *Does the process include steps for establishing and maintaining liaison with appropriate fire, police, other public officials, and 911 emergency call centers?*
- Assets Covered 86256 (92)
- Result Notes GOP Section 4.04.

99. Question Result, ID, References **Sat, EP.ERG.NOTIFPOTRUPTURE.P, 192.635**
 Question Text *Does the operator have procedures to identify and notify operator personnel of a potential rupture?*
 Assets Covered **86256 (92)**
 Result Notes **ERM Section 4.0 and ERM Section 5.1.**
100. Question Result, ID, References **NA, EP.ERG.VALVESHUTOFF.P, 192.605(b) (192.636(b))**
 Question Text *Does the operator have procedures requiring shut-off of RMVs or AETs following identification of a release?*
 Assets Covered **86256 (92)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
101. Question Result, ID, References **Sat, EP.ERG.RUPTUREIDENTIF.P, 192.615(a)(12)**
 Question Text *Does the operator have procedures to evaluate and identify if a potential rupture is an actual rupture event?*
 Assets Covered **86256 (92)**
 Result Notes **ERM Section 1.2, ERM Section 1.5, ERM Section 4.0, and ERM Section 5.1.**

EP.FII: Failure & Incident Investigation

102. Question Result, ID, References **Sat, EP.FII.INCIDENTANALYSIS.P, 192.617(a)**
 Question Text *Does the operator's processes include steps for analyzing pipeline incidents to determine their causes?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 3.02.**
103. Question Result, ID, References **NA, EP.FII.INCIDENTRMVANALYSIS.P, 192.617(a) (192.617(c))**
 Question Text *For incidents that involve an RMV, does the operator's procedures require a post-incident analysis of all the factors that may have impacted the release volume and consequences of the release and identify and implement operators and maintenance measures to minimize future incidents?*
 Assets Covered **86256 (92)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
104. Question Result, ID, References **NA, EP.FII.INCIDENTSUMMARY.P, 192.617(a) (192.617(d))**
 Question Text *For incidents that involve an RMV, does the operator's procedures require an incident summary?*
 Assets Covered **86256 (92)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
105. Question Result, ID, References **Sat, EP.FII.FAILUREANALYSIS.P, 192.617(a)**
 Question Text *Do the operator's processes include steps for analyzing pipeline failures to determine their causes?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 3.02.**
106. Question Result, ID, References **NA, EP.FII.FAILURERMVANALYSIS.P, 192.617(c)**
 Question Text *For failures that involve an RMV, do the operator's procedures require a post-failure analysis and the identification and implementation of operations and maintenance measures to minimize future failures?*
 Assets Covered **86256 (92)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
107. Question Result, ID, References **NA, EP.FII.FAILURESUMMARY.P, 192.617(d)**
 Question Text *For failures that involve an RMV, does the operator's procedures require a failure summary?*
 Assets Covered **86256 (92)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

MO.GC: Conversion to Service

108. Question Result, ID, References **NA, MO.GC.CONVERSION.P, 192.14(a) (192.14(b), 192.14(c))**
Question Text *If any pipelines were converted into Part 192 service, was a process developed addressing all the applicable requirements?*
Assets Covered **86256 (92)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. The company did not convert any pipelines from service.**

MO.GOABNORMAL: Gas Pipeline Abnormal Operations

109. Question Result, ID, References **Sat, MO.GOABNORMAL.ABNORMAL.P, 192.605(a) (192.605(c)(1))**
Question Text *Does the process fully address the responsibilities during and after an abnormal operation?*
Assets Covered **86256 (92)**
Result Notes **GOP Section 2.03, GOP Section 2.05, GOP Section 3.03, ERM Section 1.5, ERM Section 1.6, ERM Section 2.4, ERM Section 4.0, and ERM Section 5.1.**
110. Question Result, ID, References **NA, MO.GOABNORMAL.ABNORMALCHECK.P, 192.605(a) (192.605(c)(2))**
Question Text *Does the process include requirements for checking variations from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation?*
Assets Covered **86256 (92)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
111. Question Result, ID, References **Sat, MO.GOABNORMAL.ABNORMALNOTIFY.P, 192.605(a) (192.605(c)(3))**
Question Text *Does the process include requirements for notifying responsible operator personnel when notice of an abnormal operation is received?*
Assets Covered **86256 (92)**
Result Notes **GOP Section 2.03 and GOP Section 7.01.**
112. Question Result, ID, References **Sat, MO.GOABNORMAL.ABNORMALREVIEW.P, 192.605(a) (192.605(c)(4))**
Question Text *Does the process include requirements for periodically reviewing the response of operator personnel to determine the effectiveness of the processes controlling abnormal operation and taking corrective action where deficiencies are found?*
Assets Covered **86256 (92)**
Result Notes **OQ Manual 4.1.**

MO.GOCLASS: Gas Pipeline Class Location

113. Question Result, ID, References **NA, MO.GOCLASS.CLASSLOCATESTUDY.P, 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), 192.609(d), 192.609(e), 192.609(f))**
Question Text *Does the process include a requirement that the operator conduct a study whenever an increase in population density indicates a change in the class location of a pipeline segment operating at a hoop stress that is more than 40% SMYS, or indicates that the hoop stress corresponding to the established maximum allowable operating pressure for a segment of existing pipeline is not commensurate with the present class location?*
Assets Covered **86256 (92)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review. The company does not have any pipeline segments operating above 20% SMYS.**
114. Question Result, ID, References **NA, MO.GOCLASS.CLASSLOCATEREV.P, 192.605(b)(1) (192.609, 192.611(a), 192.611(b), 192.611(c), 192.611(d))**
Question Text *Does the process include a requirement that the MAOP of a pipeline segment be confirmed or revised within 24 months whenever the hoop stress corresponding to the established MAOP is determined not to be commensurate with the existing class location?*
Assets Covered **86256 (92)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

MO.GOMAOP: Gas Pipeline MAOP

115. Question Result, ID, **Sat**, MO.GOMAOP.MAOPDETERMINE.P, 192.605(b)(1) (192.619(a), 192.619(b), 192.619(c), 192.619(f),
References 192.8(b), 192.8(c)(4), 192.9(d), 192.9(e)(2), 192.9(f)(1))
Question Text *Does the process include requirements for determining the maximum allowable operating pressure for a pipeline segment in accordance with §192.619?*
Assets Covered 86256 (92)
Result Notes GOP Section 1.01.
116. Question Result, ID, **Sat**, MO.GOMAOP.MAOPLIMIT.P, 192.605(a) (192.605(b)(5), 192.8(b), 192.8(c)(4), 192.9(d),
References 192.9(e)(2), 192.9(f)(1))
Question Text *Does the process include requirements for starting up and shutting down any part of the pipeline in a manner to assure operation with the MAOP limits, plus the build-up allowed for operation of pressure-limiting and control devices?*
Assets Covered 86256 (92)
Result Notes GOP Section 1.01, GOP Section 2.03, GOP Section 3.04, GOP Section 6.09, and OQ Manual Appendix B

MO.GM: Gas Pipeline Maintenance

117. Question Result, ID, **Sat**, MO.GM.ABANDONPIPE.P, 192.605(b)(1) (192.727(a), 192.727(b), 192.727(c), 192.727(d),
References 192.727(e), 192.727(f), 192.727(g)) (also presented in: FS.FG)
Question Text *Does the process include adequate requirements for the abandonment and deactivation of pipelines and facilities?*
Assets Covered 86256 (92)
Result Notes GOP Section 6.17.
118. Question Result, ID, **Sat**, MO.GM.RECORDS.P, 192.605(b)(1) (192.709(a), 192.709(b), 192.709(c)) (also presented in:
References MO.GMOPP)
Question Text *Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*
Assets Covered 86256 (92)
Result Notes GOP Section 2.02, GOP Section 2.07, GOP Section 2.15, and GOP Section 6.09.9.
119. Question Result, ID, **Sat**, MO.GM.IGNITION.P, 192.605(b)(1) (192.751(a), 192.751(b), 192.751(c))
References
Question Text *Are there processes for minimizing the danger of accidental ignition where gas constitutes a hazard of fire or explosion?*
Assets Covered 86256 (92)
Result Notes ERM Section 1.6 and ERM Section 5.1.
120. Question Result, ID, **Sat**, MO.GM.VALVEINSPECT.P, 192.605(b)(1) (192.745(a), 192.745(b))
References
Question Text *Are there processes for inspecting and partially operating each transmission line valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable?*
Assets Covered 86256 (92)
Result Notes GOP Section 2.02, GOP Section 4.05, and GOP Section 4.06.
121. Question Result, ID, **NA**, MO.GM.EQUIPPLASTICJOINT.P, 192.605(b) (192.756) (also presented in: DC.PLASTIC)
References
Question Text *Does the process require maintaining equipment used in joining plastic pipe in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints?*
Assets Covered 86256 (92)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
122. Question Result, ID, **NA**, MO.GM.AETREQUIREMENT.P, 192.605(b) (192.745(d))
References
Question Text *Do the procedures specify the requirements necessary to be achieved when operator installs an AET?*
Assets Covered 86256 (92)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

123. Question Result, ID, References NA, MO.GM.RMVREMEDIAL.P, 192.605(b) (192.179, 192.745(e))

Question Text *Do the procedures adequately describe the remedial measures required for RMVs or AETs found inoperable or unable to maintain shut-off?*

Assets Covered 86256 (92)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

124. Question Result, ID, References NA, MO.GM.ASVSHUTINPRESS.P, 192.605(b) (192.636(f), 192.745(f))

Question Text *Do the procedures adequately describe the process for confirming ASV shut-in pressures?*

Assets Covered 86256 (92)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

MO.GOODOR: Gas Pipeline Odorization

125. Question Result, ID, References Sat, MO.GOODOR.ODORIZE.P, 192.605(b)(1) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))

Question Text *Does the process ensure appropriate odorant levels are contained in its combustible gases in accordance with 192.625?*

Assets Covered 86256 (92)

Result Notes GOP Section 2.06 and GOP Section 3.10.

MO.GO: Gas Pipeline Operations

126. Question Result, ID, References Sat, MO.GO.CONTSURVEILLANCE.P, 192.605(e) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also presented in: MO.GOCLASS)

Question Text *Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?*

Assets Covered 86256 (92)

Result Notes GOP Section 3.14.

127. Question Result, ID, References Sat, MO.GO.PURGE.P, 192.605(b)(1) (192.629(a), 192.629(b))

Question Text *Does the process include requirements for purging of pipelines in accordance with 192.629?*

Assets Covered 86256 (92)

Result Notes GOP Section 3.06.

128. Question Result, ID, References Sat, MO.GO.OMANNUALREVIEW.P, 192.605(a)

Question Text *Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?*

Assets Covered 86256 (92)

Result Notes GOP Section 2.14.

129. Question Result, ID, References Sat, MO.GO.OMEFFECTREVIEW.P, 192.605(a) (192.605(b)(8))

Question Text *Does the process include requirements for periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?*

Assets Covered 86256 (92)

Result Notes GOP Section 2.01.

130. Question Result, ID, References Sat, MO.GO.OMHISTORY.P, 192.605(a) (192.605(b)(3))

Question Text *Does the process include requirements for making construction records, maps and operating history available to appropriate operating personnel?*

Assets Covered 86256 (92)

Result Notes GOP Section 6.01.8.

131. Question Result, ID, References **Sat, MO.GO.ODDOR.P, 192.605(a) (192.605(b)(11))**
 Question Text *Does the process require prompt response to the report of a gas odor inside or near a building?*
 Assets Covered **86256 (92)**
 Result Notes **ERM Section 2.4, ERM Section 3.1, ERM Section 4.0, and ERM Section 5.1.**
132. Question Result, ID, References **NA, MO.GO.UPRATE.P, 192.13(c) (192.553(a), 192.553(b), 192.553(c), 192.553(d))**
 Question Text *Is the pressure uprating process consistent with the requirements of 192.553?*
 Assets Covered **86256 (92)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. The company does not uprate.**
133. Question Result, ID, References **NA, MO.GO.CLASSCHNGVALVSPACE.P, 192.605(b) (192.610)**
 Question Text *Does the process include the installation of RMVs or AETs whenever pipe replacements occur due to a class location change?*
 Assets Covered **86256 (92)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. There are no class location changes to any pipeline segments.**

MO.GMOPP: Gas Pipeline Overpressure Protection

134. Question Result, ID, References **Sat, MO.GMOPP.PRESSREGCAP.P, 192.605(b)(1) (192.743(a), 192.743(b), 192.743(c))**
 Question Text *Does the process include procedures for ensuring that the capacity of each pressure relief device at pressure limiting stations and pressure regulating stations is sufficient?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 2.03 and GOP Section 4.06.**
135. Question Result, ID, References **Sat, MO.GMOPP.PRESSREGTEST.P, 192.605(b)(1) (192.739(a), 192.739(b))**
 Question Text *Does the process include procedures for inspecting and testing each pressure limiting station, relief device, and pressure regulating station and their equipment?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 2.02, GOP Section 2.03, GOP Section 4.05, and GOP Section 4.06.**

MO.RW: ROW Markers, Patrols, Leakage Survey and Monitoring

136. Question Result, ID, References **Sat, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c))** (also presented in: PD.RW)
 Question Text *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 4.01.**
137. Question Result, ID, References **Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d))** (also presented in: PD.RW)
 Question Text *Does the process adequately cover the requirements for placement of ROW markers?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 2.02 and GOP Section 4.01.**
138. Question Result, ID, References **Sat, MO.RW.MARKERSURVEY.P,**
 Question Text *Are procedures in place to survey pipeline markers at specified intervals?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 4.01.**
139. Question Result, ID, References **Sat, MO.RW.LEAKAGE.P, 192.706 (192.706(a), 192.706(b), 192.935(d))**
 Question Text *Does the process require leakage surveys to be conducted?*

Assets Covered 86256 (92)
Result Notes GOP Section 4.02.

140. Question Result, ID, References Sat, MO.RW.CASINGLEAKSURVEY.P,
Question Text *Does the process require shorted casings be leak surveyed as required?*
Assets Covered 86256 (92)
Result Notes GOP Section 3.11.
141. Question Result, ID, References Sat, MO.RW.SPECIALLEAKSURVEY.P,
Question Text *Is there a process to conduct special leak surveys as required by WAC 480-93-188?*
Assets Covered 86256 (92)
Result Notes GOP Section 4.02.
142. Question Result, ID, References Sat, MO.RW.LEAKGRADE.P,
Question Text *Do procedures require grading/re-grading leaks and evaluating the concentration and extent of leakage?*
Assets Covered 86256 (92)
Result Notes GOP Section 4.02 and ERM Section 1.2.
143. Question Result, ID, References Sat, MO.RW.LEAKPERIMETER.P,
Question Text *Do procedures require checking the perimeter of a gas leak with a combustible gas indicator?*
Assets Covered 86256 (92)
Result Notes ERM Section 5.1 and GOP Section 4.02.
144. Question Result, ID, References Sat, MO.RW.LEAKFOLLOWUP.P,
Question Text *Do procedures require performing a follow-up inspection on all leak repairs with residual gas remaining in the ground not later than thirty days after the repair?*
Assets Covered 86256 (92)
Result Notes GOP Section 3.02 and GOP Section 4.02.
145. Question Result, ID, References Sat, MO.RW.LEAKRECORDS.P, (also presented in: PD.RW)
Question Text *Does the operator have procedures to prepare and maintain gas leak records containing all information required by WAC 480-93-178?*
Assets Covered 86256 (92)
Result Notes ERM Section 2.5 and ERM Section 10.2.
146. Question Result, ID, References Sat, MO.RW.LEAKCALIBRATE.P,
Question Text *Is there a process to maintain and calibrate gas detection instruments in accordance with the manufacturer's recommendations?*
Assets Covered 86256 (92)
Result Notes GOP Section 3.02, GOP Section 3.10, and GOP Section 4.02.

PD.DP: Damage Prevention

147. Question Result, ID, References Sat, PD.DP.PDPROGRAM.P, 192.614(a)
Question Text *Is a damage prevention program approved and in place?*
Assets Covered 86256 (92)
Result Notes GOP Section 2.09.
148. Question Result, ID, References Sat, PD.DP.ONECALL.P, 192.614(b)
Question Text *Does the process require participation in qualified one-call systems?*
Assets Covered 86256 (92)
Result Notes GOP Section 2.09, GOP Section 3.07, and GOP Section 3.08.

149. Question Result, ID, References **Sat, PD.DP.EXCAVATEMARK.P, 192.614(c)(5)**
 Question Text *Does the process require marking proposed excavation sites to CGA Best Practices or use more stringent and accurate requirements?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 3.08.**
150. Question Result, ID, References **Sat, PD.DP.TPD.P, 192.614(c)(1)**
 Question Text *Does the process specify how reports of Third Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 2.09 and GOP Section 4.04.**
151. Question Result, ID, References **Sat, PD.DP.TPDONECALL.P, 192.614(c)(3)**
 Question Text *Does the process specify how reports of TPD are checked against One-Call tickets?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 3.07.**
152. Question Result, ID, References **Sat, PD.DP.DPINFOGATHER.P, 192.917(b) (192.935(b)(1)(ii))**
 Question Text *Does the process require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 2.09.**
153. Question Result, ID, References **Sat, PD.DP.NOTICETOEXCAVATOR.P,**
 Question Text *Is there a process to provide the required information to excavators who damage pipeline facilities?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 2.09, GOP Section 3.02, and GOP Section 3.07.**
154. Question Result, ID, References **Sat, PD.DP.COMMISSIONREPORT.P,**
 Question Text *Is there a process to report to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-93-200(9)?*
 Assets Covered **86256 (92)**
 Result Notes **ERM Section 10.2.**

PD.PA: Public Awareness

155. Question Result, ID, References **Sat, PD.PA.ASSETS.P, 192.616(b) (API RP 1162 Section 2.7 Step 4)**
 Question Text *Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 4.04.**
156. Question Result, ID, References **Sat, PD.PA.AUDIENCEID.P, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)**
 Question Text *Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?*
 Assets Covered **86256 (92)**
 Result Notes **GOP Section 4.04.**
157. Question Result, ID, References **Sat, PD.PA.MGMTSUPPORT.P, 192.616(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)**
 Question Text *Does the operator's program documentation demonstrate management support?*
 Assets Covered **86256 (92)**

Result Notes [GOP Section 4.04.](#)

158. Question Result, ID, References [Sat, PD.PA.PROGRAM.P, 192.616\(a\) \(192.616\(h\)\)](#)
Question Text *Has the continuing public education (awareness) program been established as required?*
Assets Covered [86256 \(92\)](#)
Result Notes [GOP Section 4.04.](#)
159. Question Result, ID, References [Sat, PD.PA.MESSAGES.P, 192.616\(c\) \(API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 Section 5\)](#)
Question Text *Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where gas is transported?*
Assets Covered [86256 \(92\)](#)
Result Notes [GOP Section 4.04.](#)
160. Question Result, ID, References [Sat, PD.PA.SUPPLEMENTAL.P, 192.616\(c\) \(API RP 1162 Section 6.2\)](#)
Question Text *Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162?*
Assets Covered [86256 \(92\)](#)
Result Notes [GOP Section 4.04.](#)
161. Question Result, ID, References [Sat, PD.PA.LANGUAGE.P, 192.616\(g\) \(API RP 1162 Section 2.3.1\)](#)
Question Text *Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*
Assets Covered [86256 \(92\)](#)
Result Notes [GOP Section 4.04. All notifications are provided in English due to the demographics of the stakeholder groups associated with IEP's natural gas pipeline.](#)
162. Question Result, ID, References [Sat, PD.PA.EVALPLAN.P, 192.616\(i\) \(192.616\(c\), API RP 1162 Section 8, API RP 1162 Appendix E\)](#)
Question Text *Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?*
Assets Covered [86256 \(92\)](#)
Result Notes [GOP Section 4.04.](#)

RPT.NR: Notices and Reporting

163. Question Result, ID, References [Sat, RPT.NR.CONTACTUPDATE.P,](#)
Question Text *Is there a process to submit updated name, address, and phone numbers of emergency contacts/responsible officials to the commission and appropriate officials of ALL municipalities in which the company has pipeline facilities?*
Assets Covered [86256 \(92\)](#)
Result Notes [GOP Section 4.04.](#)
164. Question Result, ID, References [Sat, RPT.NR.CONSTRUCTIONREPORT.P,](#)
Question Text *Is there a process to file a proposed construction report for construction or replacement of any segment of gas transmission pipeline of at least 100 feet in length?*
Assets Covered [86256 \(92\)](#)
Result Notes [GOP Section 2.11.](#)
165. Question Result, ID, References [Sat, RPT.NR.PRESSURETESTNOTIFY.P,](#)
Question Text *Is there a process to notify the commission 3 days prior to commencement of any pressure test of a gas pipeline that will have a MAOP that produces a hoop stress of twenty percent or more of the specified minimum yield strength?*
Assets Covered [86256 \(92\)](#)
Result Notes [GOP Section 6.09.1.](#)

166. Question Result, ID, References **Sat, RPT.NR.PROXIMITYREQUEST.P,**
Question Text *Do the procedures specify detailed steps to comply with the proximity consideration requirement in WAC 480-93-020?*
Assets Covered **86256 (92)**
Result Notes **GOP Section 2.01.**

RPT.RR: Regulatory Reporting (Traditional)

167. Question Result, ID, References **Sat, RPT.RR.CONSTRUCTIONDEFECTS.P,**
Question Text *Is there a process to submit timely and complete reports of construction defects and material failures that resulted in leaks?*
Assets Covered **86256 (92)**
Result Notes **GOP Section 3.15.**

168. Question Result, ID, References **Sat, RPT.RR.IMMEDREPORT.P, 191.5(b) (191.7, 191.1(a), 192.8(c)(3))**
Question Text *Is there a process to immediately report incidents to the National Response Center?*
Assets Covered **86256 (92)**
Result Notes **ERM Section 10.1.**

169. Question Result, ID, References **Sat, RPT.RR.INCIDENTREPORT.P, 191.15(a) (192.624(a)(1), 192.624(a)(2), 191.1(a), 192.8(c)(3))**
Question Text *Does the process require preparation and filing of an incident report as soon as practicable but no later than 30 days after discovery of a reportable incident?*
Assets Covered **86256 (92)**
Result Notes **ERM Section 10.1 and ERM Section 10.2.**

170. Question Result, ID, References **Sat, RPT.RR.INCIDENTREPORTSUPP.P, 191.15(d) (192.624(a), 191.1(a), 192.8(c)(3))**
Question Text *Does the process require preparation and filing of supplemental incident reports?*
Assets Covered **86256 (92)**
Result Notes **ERM Section 10.2.**

171. Question Result, ID, References **Sat, RPT.RR.FAILUREANALYSIS.P,**
Question Text *Is there a process to submit failure analysis reports within 5 days of completion for incidents or hazardous conditions due to construction defects or material failures?*
Assets Covered **86256 (92)**
Result Notes **GOP Section 2.13 and GOP Section 7.03.**

172. Question Result, ID, References **Sat, RPT.RR.SRCR.P, 192.605(a) (191.23(a), 191.23(b), 191.25(a), 191.25(b), 191.25(c), 191.1(a), 192.8(c)(3))**
Question Text *Do processes require reporting of safety-related conditions?*
Assets Covered **86256 (92)**
Result Notes **GOP Section 2.13, GOP Section 7.01, and GOP Section 7.03.**

173. Question Result, ID, References **Sat, RPT.RR.SRC.P, 192.605(a) (192.605(d), 191.23(a))**
Question Text *Does the process include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that may potentially be safety-related conditions, including MAOP Exceedances?*
Assets Covered **86256 (92)**
Result Notes **GOP Section 7.01.**

174. Question Result, ID, References **NA, RPT.RR.ABANDONWATERFACILITY.P, 192.605(b)(1) (192.727(g))**
Question Text *Does the process require reports to be filed for each abandoned offshore pipeline facility or each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway?*

Assets Covered 86256 (92)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. The US Coast Guard does not identify the section of Spokane River that IEP crosses under as commercially navigable.

175. Question Result, ID, References Sat, RPT.RR.UTCANNUALREPORTS.P, 191.17(a) (191.1(a), 192.8(c)(3), 192.8(c)(4), 192.8)

Question Text *Do procedures require the operator to submit complete and accurate annuals reports and NPMS submissions to the commission by March 15th for the preceding calendar year?*

Assets Covered 86256 (92)

Result Notes GOP Section 3.15.

176. Question Result, ID, References NA, RPT.RR.PIPELINEMAPPING.P,

Question Text *Do procedures require the operator to provide accurate maps (or updates) of all pipelines operating over 250 psig to specifications developed by the commission sufficient to meet the needs of first responders?*

Assets Covered 86256 (92)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. IEP does not operate any pipelines over 250 psig. GOP Section 4.04 includes providing pipeline location information to all stakeholders, including first responders.

177. Question Result, ID, References Sat, RPT.RR.OPID.P, 191.22(a) (191.22(c), 191.22(d), 191.1(a), 192.8(c)(3))

Question Text *Does the process require the obtaining, and appropriate control, of Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate?*

Assets Covered 86256 (92)

Result Notes GOP Section 3.15.

178. Question Result, ID, References Sat, RPT.RR.DIRTREPORTS.P,

Question Text *Is there a process to submit reports of damage to the commission using the Damage Information Reporting Tool (DIRT) within 45 days?*

Assets Covered 86256 (92)

Result Notes GOP Section 3.15 and ERM Section 10.2.

TD.ATM: Atmospheric Corrosion

179. Question Result, ID, References Sat, TD.ATM.ATMCORRODE.P, 192.605(b)(2) (192.479(a), 192.479(b), 192.479(c), 192.9(f)(1), 192.453)

Question Text *Does the process give adequate guidance identifying atmospheric corrosion and for protecting above ground pipe from atmospheric corrosion?*

Assets Covered 86256 (92)

Result Notes GOP Section 4.07.

180. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.P, 192.605(b)(2) (192.481(a), 192.481(b), 192.481(c), 192.481(d), 192.9(f)(1), 192.453)

Question Text *Does the process give adequate instruction for the inspection of aboveground pipeline segments for atmospheric corrosion?*

Assets Covered 86256 (92)

Result Notes GOP Section 3.11 and GOP Section 4.07.

TD.CPMONITOR: External Corrosion - CP Monitoring

181. Question Result, ID, References Sat, TD.CPMONITOR.MONITORCRITERIA.P, 192.605(b)(2) (192.463(a), 192.463(c), 192.9(f)(1), 192.452(b), 192.452(c), 192.453)

Question Text *Does the process require CP monitoring criteria to be used that is acceptable?*

Assets Covered 86256 (92)

Result Notes GOP Section 2.08 and GOP Section 3.11.

182. Question Result, ID, References Sat, TD.CPMONITOR.TEST.P, 192.605(b)(2) (192.465(a), 192.9(f)(1), 192.452, 192.453)

Question Text *Does the process adequately describe how to monitor CP that has been applied to pipelines?*

Assets Covered 86256 (92)
Result Notes GOP Section 2.08 and GOP Section 3.11.

183. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.P, 192.605(b)(2) (192.465(b), 192.9(f)(1), 192.452, 192.453)
Question Text *Does the process give sufficient details for making electrical checks of rectifiers or impressed current sources?*
Assets Covered 86256 (92)
Result Notes GOP Section 3.11.
184. Question Result, ID, References Sat, TD.CPMONITOR.REVCURRENTTEST.P, 192.605(b)(2) (192.465(c), 192.9(f)(1), 192.452, 192.453)
Question Text *Does the process give sufficient details for making electrical checks of interference bonds, diodes, and reverse current switches?*
Assets Covered 86256 (92)
Result Notes GOP Section 3.11.
185. Question Result, ID, References Sat, TD.CPMONITOR.DEFICIENCY.P, 192.605(b)(2) (192.465(d), 192.9(f)(1), 192.452, 192.453)
Question Text *Does the process require that the operator promptly correct any identified deficiencies in corrosion control?*
Assets Covered 86256 (92)
Result Notes GOP Section 3.11.
186. Question Result, ID, References Sat, TD.CPMONITOR.TESTSTATION.P, 192.469 (192.9(f)(1), 192.452, 192.453)
Question Text *Does the process contain provisions to assure that each pipeline has sufficient test stations or other contact points to determine the adequacy of cathodic protection?*
Assets Covered 86256 (92)
Result Notes GOP Section 3.11.
187. Question Result, ID, References Sat, TD.CPMONITOR.TESTLEAD.P, 192.605(b)(2) (192.471(a), 192.471(b), 192.471(c), 192.9(f)(1), 192.452, 192.453)
Question Text *Does the process provide adequate instructions for the installation of test leads?*
Assets Covered 86256 (92)
Result Notes GOP Section 6.12.4.
188. Question Result, ID, References Sat, TD.CPMONITOR.INTFRCURRENT.P, 192.605(b)(2) (192.473(a), 192.9(d), 192.9(e), 192.9(f)(1), 192.452, 192.453)
Question Text *Does the operator have a program in place to minimize detrimental effects of interference currents on its pipeline system and does the process for designing and installing cathodic protection systems provide for the minimization of detrimental effects of interference currents on existing adjacent metallic structures?*
Assets Covered 86256 (92)
Result Notes GOP Section 3.11.

TD.CP: External Corrosion - Cathodic Protection

189. Question Result, ID, References Sat, TD.CP.POST1971.P, 192.605(b)(2) (192.455(a), 192.452(a), 192.452(b), 192.455(f), 192.455(g), 192.9(f)(1), 192.452, 192.453)
Question Text *Does the process require that each buried or submerged pipeline installed after July 31, 1971, be protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?*
Assets Covered 86256 (92)
Result Notes GOP Section 2.08, GOP Section 3.11 and GOP Section 6.08.1.
190. Question Result, ID, References NA, TD.CP.PRE1971.P, 192.605(b)(2) (192.457(b), 192.9(f)(1), 192.452, 192.453)
Question Text *Does the process require that pipelines installed before August 1, 1971 (except for cast and ductile iron lines) which are 1) bare or ineffectively coated transmission lines or 2) bare or coated pipes in compressor, regulator or meter stations must be cathodically protected in areas where active corrosion is found?*
Assets Covered 86256 (92)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

191. Question Result, ID, NA, TD.CP.UNPROTECT.P, 192.605(b)(2) (192.465(e), 192.9(f)(1), 192.452, 192.453)
References
Question Text *Does the process give sufficient direction for the monitoring of external corrosion on buried pipelines that are not protected by cathodic protection?*
Assets Covered 86256 (92)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review. IEP does not have any unprotected pipelines.
192. Question Result, ID, Sat, TD.CP.ELECISOLATE.P, 192.605(b)(2) (192.467(a), 192.467(b), 192.467(c), 192.467(d),
References 192.467(e), 192.9(f)(1), 192.452, 192.453)
Question Text *Does the process give adequate guidance for electrically isolating each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*
Assets Covered 86256 (92)
Result Notes GOP Section 3.11.
193. Question Result, ID, Sat, TD.CP.ELECISOLATETEST.P, 192.605(b)(2) (192.467(d), 192.9(f)(1), 192.452, 192.453)
References
Question Text *Does the process provide adequate guidance to inspect and electrically test to ensure that electrical isolation is adequate?*
Assets Covered 86256 (92)
Result Notes GOP Section 3.11.
194. Question Result, ID, Sat, TD.CP.CASINGINSPECT.P,
References
Question Text *Does the process give sufficient direction for conducting annual casing inspections to ensure electrical isolation from the pipeline?*
Assets Covered 86256 (92)
Result Notes GOP Section 3.11.
195. Question Result, ID, Sat, TD.CP.FAULTCURRENT.P, 192.605(b)(2) (192.467(f), 192.9(f)(1), 192.452, 192.453)
References
Question Text *Does the process provide sufficient guidance for determining when protection against damage from fault currents or lightning is needed and how that protection must be installed?*
Assets Covered 86256 (92)
Result Notes GOP Section 3.11.
196. Question Result, ID, Sat, TD.CP.RECORDS.P, 192.605(b)(2) (192.491(a), 192.491(b), 192.491(c), 192.9(f)(1), 192.452,
References 192.453) (also presented in: TD.CPMONITOR, TD.CPEXPOSED)
Question Text *Does the process include records requirements for the corrosion control activities listed in §192.491?*
Assets Covered 86256 (92)
Result Notes GOP Section 2.02, GOP Section 2.02, and GOP Section 3.11.

TD.COAT: External Corrosion - Coatings

197. Question Result, ID, Sat, TD.COAT.NEWPIPE.P, 192.605(b)(2) (192.455(a)(1), 192.461(a), 192.461(b), 192.483(a),
References 192.9(f)(1), 192.452, 192.453)
Question Text *Does the process require that each buried or submerged pipeline installed after July 31, 1971 be externally coated with a material that is adequate for underground service on a cathodically protected pipeline?*
Assets Covered 86256 (92)
Result Notes GOP Section 3.09 and GOP Section 6.08.1.
198. Question Result, ID, Sat, TD.COAT.NEWPIPEINSTALL.P, 192.605(b)(2) (192.461(c), 192.461(d), 192.461(e), 192.483(a),
References 192.9(f)(1), 192.452, 192.453)
Question Text *Does the process give adequate guidance for the application and inspection of protective coatings on pipe?*
Assets Covered 86256 (92)
Result Notes GOP Section 6.04.3, GOP Section 6.08.1, GOP Section 6.10.1, and GOP Section 6.11.2.

TD.CPEXPOSED: External Corrosion - Exposed Pipe

199. Question Result, ID, References **Sat, TD.CPEXPOSED.EXPOSEINSPECT.P, 192.605(b)(2) (192.459, 192.9(f)(1), 192.452, 192.453)**
Question Text *Does the process require that exposed portions of buried pipeline be examined for external corrosion and coating deterioration, and if external corrosion is found, further examination is required to determine the extent of the corrosion?*
Assets Covered **86256 (92)**
Result Notes **GOP Section 2.02 and GOP Section 3.09.**
200. Question Result, ID, References **Sat, TD.CPEXPOSED.EXTCORRODEEVAL.P, 192.605(b)(2) (192.485(a), 192.485(b), 192.485(c), 192.9(f)(1), 192.452, 192.453)**
Question Text *Does the process provide sufficient direction for personnel to evaluate the remaining strength of externally corroded pipe?*
Assets Covered **86256 (92)**
Result Notes **GOP Section 3.03, GOP Section 3.04, GOP Section 3.09, and GOP Section 7.01.**
201. Question Result, ID, References **Sat, TD.CPEXPOSED.EXTCORRODREPAIR.P, 192.605(b)(2) (192.485(a), 192.485(b), 192.485(c), 192.9(f)(1), 192.452, 192.453)**
Question Text *Does the process give sufficient guidance for personnel to repair or replace pipe that is externally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*
Assets Covered **86256 (92)**
Result Notes **GOP Section 3.03, GOP Section 3.04, GOP Section 3.09, and GOP Section 7.01.**

TD.ICCG: Internal Corrosion - Corrosive Gas

202. Question Result, ID, References **NA, TD.ICCG.CORRGAS.P, 192.605(b)(2) (192.475(a), 192.9(f)(1), 192.452, 192.453)**
Question Text *Does the process require that the corrosive effect of the gas in the pipeline be investigated and if determined to be corrosive, steps be taken to minimize internal corrosion?*
Assets Covered **86256 (92)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
203. Question Result, ID, References **NA, TD.ICCG.CORRGASACTION.P, 192.605(b)(2) (192.477, 192.9(f)(1), 192.452, 192.453)**
Question Text *Does the process give adequate direction for actions to be taken if corrosive gas is being transported by pipeline?*
Assets Covered **86256 (92)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

TD.ICP: Internal Corrosion - Preventive Measures

204. Question Result, ID, References **Sat, TD.ICP.EXAMINE.P, 192.605(b)(2) (192.475(a), 192.475(b), 192.9(f)(1), 192.452, 192.453)**
Question Text *Does the process direct personnel to examine removed pipe for evidence of internal corrosion?*
Assets Covered **86256 (92)**
Result Notes **GOP Section 2.02, GOP Section 3.09, and GOP Section 3.11.**
205. Question Result, ID, References **Sat, TD.ICP.EVALUATE.P, 192.605(b)(2) (192.9(f)(1), 192.452, 192.453, 192.485(a), 192.485(c))**
Question Text *Does the process give sufficient guidance for personnel to evaluate the remaining strength of pipe that has been internally corroded?*
Assets Covered **86256 (92)**
Result Notes **GOP Section 3.03, GOP Section 3.04, GOP Section 3.09, and GOP Section 7.01.**
206. Question Result, ID, References **Sat, TD.ICP.REPAIRINT.P, 192.491(c) (192.485(a), 192.485(b), 192.9(f)(1), 192.452, 192.453)**
Question Text *Does the process give sufficient guidance for personnel to repair or replace pipe that has internally corroded to an extent that there is no longer sufficient remaining strength in the pipe wall?*
Assets Covered **86256 (92)**
Result Notes **GOP Section 3.03, GOP Section 3.04, GOP Section 3.09, and GOP Section 7.01.**

TD.SP: Special Permits

207. Question Result, ID, References **NA, TD.SP.CONDITIONS.P, 190.341(d)(2)**
Question Text *Has a process been developed as necessary for complying with the special permit conditions?*
Assets Covered **86256 (92)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

TQ.OQ: Operator Qualification

208. Question Result, ID, References **Sat, TQ.OQ.OQPLAN.P, 192.805(a) (192.801(b))**
Question Text *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?*
Assets Covered **86256 (92)**
Result Notes **OQ Manual, Revision 12, July 2024.**
209. Question Result, ID, References **Sat, TQ.OQ.EVALMETHOD.P, 192.805(b) (192.803, 192.809(d), 192.809(e))**
Question Text *Are evaluation methods established and documented appropriate to each covered task?*
Assets Covered **86256 (92)**
Result Notes **Section 4 of OQ Manual.**

TQ.QU: Qualification of Personnel - Specific Requirements

210. Question Result, ID, References **Sat, TQ.QU.CORROSION.P, 192.453 (192.805(b))**
Question Text *Does the process require corrosion control processes to be carried out by, or under the direction of, qualified personnel?*
Assets Covered **86256 (92)**
Result Notes **Section 6 of OQ Manual and Appendix D of OQ Manual.**
211. Question Result, ID, References **NA, TQ.QU.HOTTAPQUAL.P, 192.627 (192.805(b))**
Question Text *Does the process require taps on a pipeline under pressure (hot taps) to be performed by qualified personnel?*
Assets Covered **86256 (92)**
Result Notes **No such activity/condition was observed during the inspection. GOP Section 6.16 does not allow for the pipeline to be tapped under pressure.**
212. Question Result, ID, References **Sat, TQ.QU.EXCAVATE.P, 192.805(b) (ADB-2006-01, 192.801, 192.328)**
Question Text *Does the process require individuals who oversee and perform marking, trenching, and backfilling operations be qualified?*
Assets Covered **86256 (92)**
Result Notes **OQ Manual - Specific Skills #2 and Specific Skill #21.**

TQ.QUOMCONST: Qualification of Personnel - Specific Requirements (O and M Construction)

213. Question Result, ID, References **Sat, TQ.QUOMCONST.WELDER.P, 192.227(a) (192.225(a), 192.225(b), 192.328(a), 192.328(b), 192.805(b))**
Question Text *Does the process require welders to be qualified in accordance with API 1104 or the ASME Boiler & Pressure Vessel Code?*
Assets Covered **86256 (92)**
Result Notes **GOP Section 3.05.**
214. Question Result, ID, References **NA, TQ.QUOMCONST.WELDERLOWSTRESS.P, 192.227(b) (192.225(a), 192.225(b), 192.805(b))**

Question Text *Does the process require welders who perform welding on low stress pipe on lines that operate at < 20% SMYS to be qualified under Section I of Appendix C to Part 192, and are welders who perform welding on service line connection to a main required to be qualified under Section II of Appendix C to Part 192?*

Assets Covered 86256 (92)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

215. Question Result, ID, NA, TQ.QUOMCONST.PLASTIC.P, 192.285(a) (192.285(d), 192.805(b), 192.285(c)) (also presented in: References DC.PLASTIC)

Question Text *Does the process require personnel making joints in plastic pipelines be qualified?*

Assets Covered 86256 (92)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

216. Question Result, ID, NA, TQ.QUOMCONST.PLASTICINSPECT.P, 192.287 (192.805(b)) (also presented in: DC.PLASTIC) References

Question Text *Does the process require that persons who inspect joints in plastic pipes be qualified?*

Assets Covered 86256 (92)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

TQ.TR: Training of Personnel

217. Question Result, ID, Sat, TQ.TR.TRAINING.P, 192.615(b)(2) (192.805(b)) References

Question Text *Does the process require a continuing training program to be in place to effectively instruct emergency response personnel?*

Assets Covered 86256 (92)

Result Notes GOP Section 3.13 and ERM Section 11.

218. Question Result, ID, Sat, TQ.TR.TRAININGREVIEW.P, 192.615(b)(3) References

Question Text *Does the process require review of emergency response personnel performance?*

Assets Covered 86256 (92)

Result Notes ERM Section 11.

DC.CO: Construction

219. Question Result, ID, Sat, DC.DPC.CCPROTCOATLOWER.P, 192.143(b) (192.461(c)) (also presented in: DC.DPC) References

Question Text *Do written specifications stipulate that each external protective coating must be inspected just prior to lowering the pipe into the ditch and backfilling, and any damage detrimental to effective corrosion control must be repaired?*

Assets Covered 86256 (92)

Result Notes GOP Section 3.09 includes procedures for inspecting exposed pipeline coatings. GOP Section 6.08.1 includes procedures for repairing external coatings if damage is discovered. GOP Section 6.10 includes procedures to inspect coating during installation.

DC.SPT: Spike Hydrotest

220. Question Result, ID, Sat, DC.PT.PRESSTESTENVIRON.P, 192.515(b) (192.629(a), 192.629(b)) (also presented in: DC.PT, References DC.PTLOWPRESS)

Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, the test medium will be disposed of in a manner that will minimize damage to the environment?*

Assets Covered 86256 (92)

Result Notes GOP Section 6.09.6.

221. Question Result, ID, Sat, DC.PT.PRESSTESTSAFETY.P, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.PT, References DC.PTLOWPRESS)

Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*

Assets Covered 86256 (92)
Result Notes GOP Section 1.01.

222. Question Result, ID, References Sat, DC.PT.PRESSTESTRECORD.P, 192.517(a) (192.517(b)) (also presented in: DC.PT, DC.PTLOWPRESS)
Question Text *Does the process require that, as applicable to the project, creation and retention of a record of each Subpart J test for the required duration?*
Assets Covered 86256 (92)
Result Notes GOP Section 6.09.9.

DC.PTLOWPRESS: Pressure Testing - Low Pressure

223. Question Result, ID, References Sat, DC.PT.PRESSTEST.P, 192.605(b) (192.303, 192.503(a), 192.503(b), 192.503(c), 192.503(d), 192.503(e)) (also presented in: DC.PT)
Question Text *Does the process require pressure testing to be conducted for new segments of pipeline, or return to service segments of pipeline that are being relocated or replaced?*
Assets Covered 86256 (92)
Result Notes GOP Section 6.09.1 and GOP Section 6.09.8.
224. Question Result, ID, References Sat, DC.PT.PRESSTESTENVIRON.P, 192.515(b) (192.629(a), 192.629(b)) (also presented in: DC.PT, DC.SPT)
Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, the test medium will be disposed of in a manner that will minimize damage to the environment?*
Assets Covered 86256 (92)
Result Notes GOP Section 6.09.6.
225. Question Result, ID, References Sat, DC.PT.PRESSTESTSAFETY.P, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.PT, DC.SPT)
Question Text *Does the process require that, as applicable to the project, while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*
Assets Covered 86256 (92)
Result Notes GOP Section 1.01.
226. Question Result, ID, References Sat, DC.PT.PRESSTESTRECORD.P, 192.517(a) (192.517(b)) (also presented in: DC.PT, DC.SPT)
Question Text *Does the process require that, as applicable to the project, creation and retention of a record of each Subpart J test for the required duration?*
Assets Covered 86256 (92)
Result Notes GOP Section 6.09.9.

DC.PLASTIC: Plastic Pipe Construction

227. Question Result, ID, References Sat, DC.MA.MARKING.P, 192.63 (also presented in: DC.MA)
Question Text *Does the operator have specifications requiring pipe, valves, and fittings to be marked according to the requirements of §192.63?*
Assets Covered 86256 (92)
Result Notes GOP Section 6.01.6.
228. Question Result, ID, References NA, DC.CO.NONWELDJOINT.P, 192.303 (192.273(a), 192.273(b), 192.273(c)) (also presented in: DC.CO)
Question Text *Does the process require that pipeline joints (to be made other than by welding) be designed and installed in accordance with 192.273?*
Assets Covered 86256 (92)
Result Notes The company only uses welding to join pipe.
229. Question Result, ID, References Sat, DC.CO.CLEARANCE.P, 192.303 (192.325(a), 192.325(b), 192.325(c), 192.325(d)) (also presented in: DC.CO)

Question Text *Does the process require pipe to be installed with clearances specified in 192.325 and (if plastic) installed as to prevent heat damage to the pipe?*

Assets Covered 86256 (92)

Result Notes GOP Section 3.09, 4, requires a minimum clearance of 12 inches between the steel transmission line and any other utility facilities in accordance with CFR § 192.325. WAC 480-93-178 is not applicable, as the company does not utilize plastic pipelines.

230. Question Result, ID, References NA, MO.GM.EQUIPPLASTICJOINT.P, 192.605(b) (192.756) (also presented in: MO.GM)

Question Text *Does the process require maintaining equipment used in joining plastic pipe in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints?*

Assets Covered 86256 (92)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

231. Question Result, ID, References NA, TQ.QUOMCONST.PLASTIC.P, 192.285(a) (192.285(d), 192.805(b), 192.285(c)) (also presented in: TQ.QUOMCONST)

Question Text *Does the process require personnel making joints in plastic pipelines be qualified?*

Assets Covered 86256 (92)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

232. Question Result, ID, References NA, TQ.QUOMCONST.PLASTICINSPECT.P, 192.287 (192.805(b)) (also presented in: TQ.QUOMCONST)

Question Text *Does the process require that persons who inspect joints in plastic pipes be qualified?*

Assets Covered 86256 (92)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

FS.FG: Facilities General

233. Question Result, ID, References Sat, MO.GM.ABANDONPIPE.P, 192.605(b)(1) (192.727(a), 192.727(b), 192.727(c), 192.727(d), 192.727(e), 192.727(f), 192.727(g)) (also presented in: MO.GM)

Question Text *Does the process include adequate requirements for the abandonment and deactivation of pipelines and facilities?*

Assets Covered 86256 (92)

Result Notes GOP Section 6.17.

MO.GOCLASS: Gas Pipeline Class Location

234. Question Result, ID, References Sat, MO.GO.CONTSURVEILLANCE.P, 192.605(e) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also presented in: MO.GO)

Question Text *Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?*

Assets Covered 86256 (92)

Result Notes GOP Section 3.14.

MO.GMOPP: Gas Pipeline Overpressure Protection

235. Question Result, ID, References Sat, MO.GM.RECORDS.P, 192.605(b)(1) (192.709(a), 192.709(b), 192.709(c)) (also presented in: MO.GM)

Question Text *Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*

Assets Covered 86256 (92)

Result Notes GOP Section 2.02, GOP Section 2.07, GOP Section 2.15, and GOP Section 6.09.9.

PD.RW: ROW Markers, Patrols, Monitoring

236. Question Result, ID, References Sat, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c)) (also presented in: MO.RW)

Question Text *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*
Assets Covered 86256 (92)
Result Notes GOP Section 4.01.

237. Question Result, ID, Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: References MO.RW)

Question Text *Does the process adequately cover the requirements for placement of ROW markers?*
Assets Covered 86256 (92)
Result Notes GOP Section 2.02 and GOP Section 4.01.

238. Question Result, ID, References Sat, MO.RW.LEAKRECORDS.P, (also presented in: MO.RW)

Question Text *Does the operator have procedures to prepare and maintain gas leak records containing all information required by WAC 480-93-178?*
Assets Covered 86256 (92)
Result Notes ERM Section 2.5 and ERM Section 10.2.

TD.CPMONITOR: External Corrosion - CP Monitoring

239. Question Result, ID, Sat, TD.CP.RECORDS.P, 192.605(b)(2) (192.491(a), 192.491(b), 192.491(c), 192.9(f)(1), 192.452, References 192.453) (also presented in: TD.CP, TD.CPEXPOSED)

Question Text *Does the process include records requirements for the corrosion control activities listed in §192.491?*
Assets Covered 86256 (92)
Result Notes GOP Section 2.02, GOP Section 2.02, and GOP Section 3.11.

TD.CPEXPOSED: External Corrosion - Exposed Pipe

240. Question Result, ID, Sat, TD.CP.RECORDS.P, 192.605(b)(2) (192.491(a), 192.491(b), 192.491(c), 192.9(f)(1), 192.452, References 192.453) (also presented in: TD.CP, TD.CPMONITOR)

Question Text *Does the process include records requirements for the corrosion control activities listed in §192.491?*
Assets Covered 86256 (92)
Result Notes GOP Section 2.02, GOP Section 2.02, and GOP Section 3.11.

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.

FORM V Gas OM/Procedures 8787

UTC O&M/Procedures Inspection Report
 Intrastate GAS
 FORM V Gas OM/Procedures: State-Specific Requirements

**** THIS FORM IS REQUIRED FOR USE FOR ALL INTRASTATE GAS OPERATORS. USE IN CONJUNCTION WITH THE "BASELINE PROCEDURES" MODULE IN THE MOST CURRENT WA-SPECIFIC GD QUESTION SET**

Inspector and Operator Information

Inspection ID 8787	Inspection Link 8787	Inspector - Lead Anderson, Scott	Inspector - Assist Hoxit, Jason
Operator Inland Empire Paper Company	Unit Inland Empire Paper Company	Records Location - City & State Spokane, WA	
Inspection Start Date 07-22-2024	Inspection Exit Interview Date 07-23-2024	Engineer Submit Date	

You must include the following in your inspection summary:

- *Inspection Scope and Summary
- *Facilities visited and Total AFOD
- * Summary of Significant Findings
- * Primary Operator contacts and/or participants

Scott Anderson (Lead), Jason Hoxit (Team).

NOTE: Inspection Setup/pre-plan analysis is not used for this type of WA intrastate inspection.

Inspection Scope and Summary

This inspection was a review of Inland Empire Paper Company's Gas Operating Procedures (GOP), Emergency Response Manual (ERM), and Operation Qualification Manual (OQ Manual) for the Operations and Maintenance Plans and Procedures Review (O&M Review).

Facilities visited and Total AFOD

Facilities were not visited for the O&M Review. This inspection was 4 AFODs.

Summary of Significant Findings

No significant findings. There were no areas of concern or probable violations as a result of this inspection.

Primary Operator contacts and/or participants

Kevin Davis, Manager of Strategic Projects
 Doug Krapas, Environmental Manager

Operator executive contact and mailing address for any official correspondence

Kevin Rasler, President
 Inland Empire Paper Company
 3320 N. Argonne Rd.
 Millwood, WA 99212

Instructions and Ratings Definitions

INSTRUCTIONS

S - Satisfactory

U - Unsatisfactory

Area Of Concern

INSPECTION RESULTS

Satisfactory Responses

8

Unsatisfactory Responses

0

Area of Concern Responses

0

Satisfactory List

2,3,4,5,6,7,9,

Unsatisfactory List

Area of Concern List

Unanswered Questions

0

Unanswered Questions List

N/A- Not Applicable (does not apply to this operator or system)

Not Applicable Responses
4

Not Applicable List
1,8,10,11,

N/C - Not Checked/Evaluated (was not inspected during this inspection)

Not Checked / Evaluated Responses
0

Not Checked / Evaluated List

****If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question, and summarized in the "PROCEDURES: SUMMARY OF REQUIRED COMMENTS" section at the end of this form.**

▼ **INTRASTATE GAS OPERATOR PROCEDURES**

▼ **MAPPING PROCEDURES**

Question 1

Do procedures require accurate maps (or updates) of pipelines operating over 250PSIG to specifications developed by the commission and sufficient to meet the needs of first responders?

Q1 Reference
RCW 81.88.080

Q1 Result
Not Applicable

Q1 Notes

IEP does not operate any pipelines over 250 psig. GOP Section 4.04 includes providing pipeline location information to all stakeholders, including first responders.

Question 2

Do procedures require that NPMS submissions are updated every 12 months if system modifications (excludes distribution lines and gathering lines) occurred, and if no modifications occurred an email to that effect was submitted to NPMS?

Q2 Reference
PHMSA ADB 08-07

Q2 Result
Satisfactory

Q2 Notes

GOP Section 3.15.

▼ **REPORTING PROCEDURES**

Question 3

Do procedures require that the operator file with the commission, not later than March 15 of each year, applicable to the preceding calendar year: copy of every Pipeline and Hazardous Materials Safety Administration (PHMSA) F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, Office of Pipeline Safety

Q3 Reference
WAC 480-93-200(10)

Q3 Result
Satisfactory

Q3 Notes

GOP Section 3.15. Note: F7100.1-1 is not applicable, as IEP does not operate a distribution system.

▼ **DAMAGE PREVENTION PROCEDURES**

Question 4

Do procedures include the use of a quality assurance program for monitoring the locating and marking of facilities? Does the procedure require regular field audits of the performance of locators/contractors and implementing appropriate corrective action when necessary?

Q4 Reference
PHMSA State Program Question

Q4 Result
Satisfactory

Q4 Notes

GOP Section 2.09, GOP Section 3.02, GOP Section 3.07, and GOP Section 3.08.

Question 5

Do procedures outline a process by which locator and excavator personnel are properly qualified in accordance with the operator's OQ plan and with state OQ requirements?

Q5 Reference

WAC 480-93-013

Q5 Result

Satisfactory

Q5 Notes

OQ Manual – Specific Skills #2 and Specific Skills #21.

Question 6

Does the operator have sufficiently detailed directional drilling/boring procedures which include taking actions necessary to protect their facilities from dangers posed by drilling/other trenchless technologies?

Q6 Reference

PHMSA State Programs Emphasis

Q6 Result

Satisfactory

Q6 Notes

GOP Section 6.03.6, GOP Section 6.08.1, and GOP Section 6.10.1.

Question 7

Does the operator have a sufficiently detailed procedure to review records of accidents and failures caused by excavation damage to ensure the causes of those failures are addressed to minimize the possibility of reoccurrence?

Q7 Reference

PHMSA State Programs Emphasis

Q7 Result

Satisfactory

Q7 Notes

GOP Section 3.02.

DESIGN/CONSTRUCTION PROCEDURES

Question 8

Does the operator have sufficiently detailed procedures to ensure protection of plastic pipe in accordance with WAC 480-93-178?

Q24 Reference

WAC 480-93-178

Q8 Result

Not
Applicable

Q8 Notes

IEP does not operate any plastic pipelines.

CORROSION CONTROL PROCEDURES

OPERATIONS & MAINTENANCE PROCEDURES

Question 9

Do the operator's procedures contain sufficient detail to comply with the required entries for all gas leak records according to the criteria outlined in WAC 480-93-187(1-13)?

Q9 Reference

WAC 480-93-187

Q9 Result

Satisfactory

Q9 Notes

ERM Section 2.5 and ERM Section 10.2.

Question 10

Does the operator's OQ plan/procedure identify "New Construction" activities as covered tasks in accordance with WAC 480-93-013?

Q10 Reference
WAC 480-93-013

Q10 Result
Not
Applicable

Q10 Notes

IEP has not had any new construction performed on its pipeline. If new construction was required, IEP would hire an engineering company and add a new section to its manual.

PROCEDURES: SUMMARY OF REQUIRED COMMENTS

PROCEDURE REVIEW SUMMARY: Comments are required for any rating other than "Satisfactory". Summarize the "Notes" blocks above, and ensure you annotate the question number for each comment.

Question 1: NA - IEP does not operate any pipelines over 250 psig.

Question 8: NA - IEP does not operate any plastic pipelines.

Question 10: NA - IEP has not had any new construction performed on its pipeline.

ADDITIONAL HEADER TEMPLATE

Question 11

Template for additional questions

Q11 Reference
WAC 480-75-330

Q11 Result
Not Applicable

Q11 Notes

No additional questions.

Comments Template for additional comment boxes
