

# 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	8800 - NWN Clark Standard Records and Field	Operator(s)	NORTHWEST NATURAL GAS CO (13840) Lead Scott Anderson	Plan Submitted	12/07/2023
Status	LOCKED	Team Members	David Cullom, Lex Vinsel, Anthony Dorrough, Derek Norwood, Tom Green, Jason Hoxit	Plan Approval	12/12/2023 by Dennis Ritter
Start Year	2024	Observer(s)	John Trier, Marina Rathbun	All Activity Start	04/15/2024
System Type	GD	Supervisor	Dennis Ritter	All Activity End	04/18/2024
Protocol Set ID	WA.GD.2023.02	Director	Scott Rukke	Inspection Submitted	05/23/2024
				Inspection Approval	06/02/2024 by Scott Rukke

## Inspection Summary

### Inspection Scope and Summary

This inspection consisted of a records and field review of Northwest Natural Gas (NWN) Clark County District. NWN is an LDC that is headquartered in Portland, OR. It was conducted primarily in this application (IA), but some additional Washington State questions were completed in the UTC's inspection system.

### Facilities visited and Total AFOD

4 AFOD

### Summary of Significant Findings

2 probable violations:

See question TD.CPEXPOSED.EXPOSEINSPECT.R regarding WAC 480-93-110(8), the operator did not take pipe to soil readings when the pipe was exposed.

See question FS.FG.CASINGSEALS.R regarding WAC 480-93-115(4)(5), the sealing of mains or services in a conduit or casing.

### Primary Operator contacts and/or participants

Ryan Truair, Compliance Senior Manager, NW Natural Gas

Samantha Rookstool, Compliance Specialist, NW Natural Gas

Andy Fortier, Compliance Engineer, NW Natural Gas

Ben Stiles, Field Operations Supervisor, NW Natural Gas

Ryan Winfree, Area Engineer, NW Natural Gas

JC Sanchez, Area Engineer, NW Natural Gas

### Operator executive contact and mailing address for any official correspondence

Joe Karney

VP of Engineering and Utility Operations

NW Natural

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Portland, OR 97204

## Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1. 90888 (78)	Northwest Natural-CLARK	unit	90888	Storage Fields Bottle/Pipe - Holders Vault Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric	150	150	150	150	100.0%

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

## Plans

# Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1. 90888 (78)	WUTC Standard Inspection	PRO, PRR, FR, GDIM, LPGIM, MISCTOPICS, GENERIC	R, O	Detail	--

## Plan Implementations

# Activity Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1 Records and Field	--	04/15/2024	04/18/2024	WUTC Standard Inspection	PRO, PRR, FR, GDIM, LPGIM, MISCTOPICS, GENERIC	all assets	all types	150	150	150	150	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	Records and Field	COMPLETED	04/29/2024	Records and Field	90888 (78)

## Results (all values, 150 results)

153 (instead of 150) results are listed due to re-presentation of questions in more than one sub-group.

### PRR.REPORT: Reporting

1. Question Result, ID, References Sat, RPT.RR.IMMEDREPORT.R, 191.5(a) (191.7(a), 191.7(d))

Question Text Do records indicate immediate notifications of incidents were made in accordance with 191.5?

8800 - NWN Clark Standard Records and Field

Assets Covered 90888 (78)

Result Notes Incident notifications were reported within the requirements, no federal. NWN state reportable incidents: 17 in 2021, 14 in 2022, and 6 in 2023.

2. Question Result, ID, NA, RPT.RR.INCIDENTREPORT.R, 191.9(a)  
References

Question Text *Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.1 within the required time frame?*

Assets Covered 90888 (78)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

3. Question Result, ID, NA, RPT.RR.INCIDENTREPORTSUPP.R, 191.9(b)  
References

Question Text *Do records indicate accurate supplemental incident reports were filed and within the required timeframe?*

Assets Covered 90888 (78)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

4. Question Result, ID, Sat, RPT.RR.ANNUALREPORT.R, 191.11(a)  
References

Question Text *Have complete and accurate Annual Reports been submitted?*

Assets Covered 90888 (78)

Result Notes Submitted 3/7/22 for CY 2021, 3/15/2023 for CY 2022, and 3/13/2024 for CY 2023. Reports complete and accurate.

5. Question Result, ID, Sat, RPT.RR.UTCANNUALREPORTS.R,  
References

Question Text *Have complete and accurate annual reports been submitted to the commission?*

Assets Covered 90888 (78)

Result Notes Complete and accurate reports were submitted to the commission on time.

6. Question Result, ID, Sat, RPT.RR.MISDATAREPORTS.R,  
References

Question Text *Has the operator submitted a copy of DOT Drug and Alcohol Testing MIS Data Collection Form to the commission when required?*

Assets Covered 90888 (78)

Result Notes Submitted 3/11/2022 for CY 2021, 3/1/23 for CY 2022, and 2/28/24 for CY 2023.

7. Question Result, ID, NA, RPT.RR.SRCR.R, 191.23(a) (191.23(b), 191.25(a), 191.25(c))  
References

Question Text *Do records indicate safety-related condition reports were filed as required?*

Assets Covered 90888 (78)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

8. Question Result, ID, NA, RPT.RR.MAOPINCREASENOTIFY.R,  
References

Question Text *Do records indicate submittal of a written plan of procedures to the commission at least forty-five days before uprating to a MAOP greater than 60 psig?*

Assets Covered 90888 (78)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

9. Question Result, ID, Sat, RPT.RR.THIRTYDAYRPT.R,  
References

Question Text *Has the operator submitted a written report within 30 days following each reportable incident?*

Assets Covered 90888 (78)

Result Notes 30-day reports were submitted on-time for each reportable incident, approximately 40 from 2021-2023.

10. Question Result, ID, Sat, MO.GO.CUSTNOTIFY.R, 192.16(d) (192.16(a), 192.16(b), 192.16(c))  
References

Question Text *Do records indicate the customer notification process satisfies the requirements of 192.16?*

Assets Covered 90888 (78)

Result Notes Customers are notified via bill inserts, electronically, and/or physically mailed.

11. Question Result, ID, References **Sat, RPT.RR.DAILYCONSTRUCTIONRPT.R,**  
 Question Text *Do records indicate daily construction and repair activities were emailed to the commission no later than 10 AM each day work is scheduled?*  
 Assets Covered **90888 (78)**  
 Result Notes **NWN has submitted their daily construction schedules by 10AM each work day. Per the pipeline@utc.wa.gov inbox, NWN daily construction reports come in around 09:30.**
12. Question Result, ID, References **Sat, RPT.RR.PIPELINEMAPPING.R,**  
 Question Text *Has the operator provided 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 **90888 (78)**  
 Result Notes **Submitted 3/2024 for CY 2023, 2/2023 for CY 2022, and 3/2022, for CY 2021.**

## PRR.CORROSION: Corrosion Control

13. Question Result, ID, References **Sat, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))**  
 Question Text *Do records indicate qualification of personnel implementing pipeline corrosion control methods?*  
 Assets Covered **90888 (78)**  
 Result Notes **Reviewed NWN CP technician's John Goebel (2021-2023) and John Mours(2021-2023). These technicians perform routine CP work, their OQs were adequate and up to date.**
14. Question Result, ID, References **Sat, TD.CP.RECORDS.R, 192.491(a) (192.491(b), 192.491(c))**  
 Question Text *Do records indicate the location of all corrosion control items listed in §192.491(a)?*  
 Assets Covered **90888 (78)**  
 Result Notes **NWN CP reports appeared to have all locations listed. CP reports included rectifiers, annual reads, casings, and isolated plats.**
15. Question Result, ID, References **Unsat, TD.CPEXPOSED.EXPOSEINSPECT.R, 192.491(c) (192.459)**  
 Question Text *Do records adequately document that exposed buried piping was examined for corrosion?*  
 Assets Covered **90888 (78)**  
 Result Issue Summary **After reviewing NWN Completed Pipe Inspections Reports for 2021-2023. These exposed pipe reports indicated that a pipe-to-soil was not taken on all steel jobs when the pipe was exposed. The reports did also not indicate if the coating was removed or not. Per the report there were approximately 8 jobs in 2023 where a pipe to soil was not taken when there was an indication that the material was steel. NWN procedure SPW 459, "Inspection of Exposed Pipe and Internal Pipe Surfaces," section 2.2. See attached report for more information.**  
  
**WAC 480-93-110(8) - On all cathodically protected pipelines, the gas pipeline company must take a cathodic protection test reading each time an employee or representative of the gas pipeline company exposes the facility and the protective coating is removed.**  
 Standard Issues **B2 (Moderate or small impact/limited occurrence) : WAC 480-93-110(8) : Documentation insufficient to demonstrate compliance with specific regulation.**  
 Result Notes **Reviewed NWN Completed Pipe Inspections Reports for 2021-2023. These exposed pipe reports indicated that a pipe-to-soil was not taken on all steel jobs when the pipe was exposed. The provided record is located in the attachments of this inspection, per the report there were approximately 8 jobs in 2023 where a pipe-to-soil was not taken when there was an indication that the material was steel.**
16. Question Result, ID, References **Sat, TD.CPMONITOR.MONITORCRITERIA.R, 192.491(c) (192.463(a))**  
 Question Text *Do records document that the CP monitoring criteria used was acceptable?*  
 Assets Covered **90888 (78)**  
 Result Notes **NWN uses the -850mV criteria for CP monitoring.**
17. Question Result, ID, References **Sat, TD.CPMONITOR.TEST.R, 192.491(c) (192.465(a))**  
 Question Text *Do records adequately document cathodic protection monitoring tests have occurred as required?*

Assets Covered 90888 (78)

Result Notes Reviewed NWN annual CP survey reports. Tests occurred within the required intervals and were within the required limits.

18. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.R, 192.491(c) (192.465(b))

Question Text *Do records document details of electrical checks of sources of rectifiers or other impressed current sources?*

Assets Covered 90888 (78)

Result Notes Reviewed NWN rectifier inspection reports, all checks were done within the required interval. In March of 2021 the rectifier at SE Everett & Lake Rd in Camas had a 0 read due to construction being performed at the nearby gate station. Although there was a zero read, the system was still being supported by another rectifier in the vicinity.

19. Question Result, ID, References NA, TD.CPMONITOR.REVCURRENTTEST.R, 192.491(c) (192.465(c))

Question Text *Do records document details of electrical checks interference bonds, diodes, and reverse current switches?*

Assets Covered 90888 (78)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. No interference.

20. Question Result, ID, References Sat, TD.CPMONITOR.DEFICIENCY.R, 192.491(c) (192.465(d))

Question Text *Do records adequately document actions taken to correct any identified deficiencies in corrosion control?*

Assets Covered 90888 (78)

Result Notes Reviewed NWN Corrosion Problem Report which identifies any deficiencies. Reviewed samplings from 2021-2023, any deficiencies were corrected properly.

21. Question Result, ID, References NA, TD.CP.UNPROTECT.R, 192.491(c) (192.465(e))

Question Text *Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating?*

Assets Covered 90888 (78)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

22. Question Result, ID, References Sat, FS.FG.CASINGTESTLEAD.R,

Question Text *Do records indicate that all casings without vents installed after September 5, 1992 had separate test lead wires installed?*

Assets Covered 90888 (78)

Result Notes NWN casings all have vents and test leads.

23. Question Result, ID, References Unsat, FS.FG.CASINGSEALS.R,

Question Text *Do records indicate that mains and service lines installed in casing or conduit are sealed at the ends as required?*

Assets Covered 90888 (78)

Result Issue Summary NWN has procedures that require ends are sealed as stated in the FOM "Guidelines for Installing Conduit", "Installing Steel Pipe in Casing", and "Installing Polyethylene Pipe Through Conduits or Casing". It is also reviewed by NWN's Quality Assurance Inspections in element B2f "Proper sealing of casing/conduit". After reviewing a sampling of service and main steel construction jobs, it was not indicated that if a newly installed pipe was or was not in a casing/conduit, and if it was, were the end(s) sealed.

*WAC 480-93-115(3) Whenever a gas pipeline company installs a main or transmission line in a casing or conduit of any type material, the gas pipeline company must seal the casing ends to prevent or slow the migration of gas in the event of a leak.*

*WAC 480-93-115(4) Whenever a gas pipeline company installs a service line in a casing or conduit, the gas pipeline company must seal the casing at the end nearest the building wall to prevent or slow the migration of gas towards the building in the event of a leak.*

Standard Issues B2 (Moderate or small impact/limited occurrence) : 480-93-115(3)(4) : Documentation insufficient to demonstrate compliance with specific regulation.

- Result Notes After reviewing a sampling of jobs, there was no indication that if the pipe was installed in a casing, were the ends sealed.
24. Question Result, ID, References Sat, TD.CP.ELECISOLATE.R, 192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))  
 Question Text Do records adequately document electrical isolation of 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 90888 (78)  
 Result Notes Reviewed casing reports, all were adequate. Isolation at flanges is checked but not always reported.
25. Question Result, ID, References Sat, TD.CP.ELECISOLATETEST.R, 192.491(c) (192.467(d))  
 Question Text Do records adequately document the inspection and electrical testing performed to ensure that electrical isolation is adequate?  
 Assets Covered 90888 (78)  
 Result Notes Reviewed CP Isolated plat reports, all were adequate.
26. Question Result, ID, References Sat, TD.CP.CASINGINSPECT.R,  
 Question Text Do records indicate that annual casing inspections have been performed to ensure electrical isolation from the pipeline?  
 Assets Covered 90888 (78)  
 Result Notes Reviewed NWN annual CP Casing Inspection Reports for 2021-2023, numbers were within the required limits. No shorted casings.
27. Question Result, ID, References Sat, TD.CP.MONITOR.TESTSTATION.R, 192.469  
 Question Text Do records identify the location of test stations and show a sufficient number of test stations?  
 Assets Covered 90888 (78)  
 Result Notes NWN CP report lists locations of all test stations throughout Clark County. Approximately 600 in the report.
28. Question Result, ID, References Sat, TD.CP.MONITOR.TESTLEAD.R, 192.491(c) (192.471(a), 192.471(b), 192.471(c))  
 Question Text Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?  
 Assets Covered 90888 (78)  
 Result Notes Reviewed NWN IQGeo Mapping software that shows all locations of test stations, all test stations have test leads installed.
29. Question Result, ID, References NA, TD.CP.MONITOR.INTFRCURRENT.R, 192.491(c) (192.473(a))  
 Question Text Do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?  
 Assets Covered 90888 (78)  
 Result Notes No such event occurred, or condition existed, in the scope of inspection review. No interference.
30. Question Result, ID, References NA, TD.ICP.CORRGAS.R, 192.491(c) (192.475(a))  
 Question Text Do the records demonstrate that the corrosive effect of the gas in the pipeline has been investigated and if determined to be corrosive, steps be taken to minimize internal corrosion?  
 Assets Covered 90888 (78)  
 Result Notes No such event occurred, or condition existed, in the scope of inspection review.
31. Question Result, ID, References NA, TD.ICP.EXAMINE.R, 192.491(c) (192.475(a), 192.475(b))  
 Question Text Do records document examination of removed pipe for evidence of internal corrosion?  
 Assets Covered 90888 (78)  
 Result Notes No such event occurred, or condition existed, in the scope of inspection review.

32. Question Result, ID, References **NA, TD.ICP.CORRGASACTION.R, 192.491(c) (192.477)**  
 Question Text *Do records document the actions taken when corrosive gas is being transported by pipeline?*  
 Assets Covered **90888 (78)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
33. Question Result, ID, References **Sat, TD.ATM.ATMCORRODE.R, 192.491(c) (192.479(a), 192.479(b), 192.479(c))**  
 Question Text *Do records document the protection of above ground pipe from atmospheric corrosion?*  
 Assets Covered **90888 (78)**  
 Result Notes **Reviewed NWN Atmospheric Corrosion Remediation Report 2021-2023, also picked a sampling of jobs from this report for remediation. Those were reviewed also.**
34. Question Result, ID, References **Sat, TD.ATM.ATMCORRODEINSP.R, 192.491(c) (192.481(a), 192.481(b), 192.481(c), 192.481(d))**  
 Question Text *Do records document inspection of aboveground pipe for atmospheric corrosion?*  
 Assets Covered **90888 (78)**  
 Result Notes **Reviewed NWN Atmospheric Corrosion Inspection Reports, records were adequate. Also reviewed NWN CFS reports for any atmospheric corrosion remediation for 2021-2023.**
35. Question Result, ID, References **Sat, TD.COAT.NEWPIPE.R, 192.491(c) (192.455(a), 192.461(a), 192.461(b), 192.483(a))**  
 Question Text *Do records document that each buried or submerged pipeline installed after July 31, 1971 has been externally coated with a suitable coating material?*  
 Assets Covered **90888 (78)**  
 Result Notes **NWN FOM (Field Operating Manual) Coatings. Reviewed a sampling of construction reports for 2021-2023, if a job requires coating and or is coated, it is specified in the form.**
36. Question Result, ID, References **NA, TD.CPEXPOSED.EXTCORRODREPAIR.R, 192.491(c) (192.487, 192.489)**  
 Question Text *Do records document the repair or replacement of pipe that has been externally corroded to an extent that there is not sufficient remaining pipe wall strength?*  
 Assets Covered **90888 (78)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
37. Question Result, ID, References **NA, TD.ICP.EVALUATE.R, 192.491(c) (192.487)**  
 Question Text *Do records document adequate evaluation of internally corroded pipe?*  
 Assets Covered **90888 (78)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
38. Question Result, ID, References **NA, TD.ICP.REPAIRINT.R, 192.491(c) (192.487, 192.489)**  
 Question Text *Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*  
 Assets Covered **90888 (78)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
39. Question Result, ID, References **NA, AR.RCOM.REPAIR.R, 192.491(c) (192.487, 192.489)**  
 Question Text *Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*  
 Assets Covered **90888 (78)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## PRR.PT: Pressure Test

40. Question Result, ID, References **Sat, DC.PTLOWPRESS.PRESSTESTLOWSTRESS.R, 192.517(a) (192.507(a), 192.507(b), 192.507(c))**  
 Question Text *Do records indicate that pressure testing is conducted in accordance with 192.507?*



Assets Covered 90888 (78)

Result Notes Reviewed construction job @ 3344 NE Everett St. hydrotest test performed by Mike Morgan, 8" steel, .322 WT, X52, recorder 1190625, 875psig from 0700-1600. Pressure test was performed July 2023.

41. Question Result, ID, References Sat, DC.PTLOWPRESS.PRESSTEST100PSIG.R, 192.517(b) (192.509(a), 192.509(b))

Question Text Do records indicate that pressure testing is conducted in accordance with 192.509(a) (except for service lines and plastic pipelines)?

Assets Covered 90888 (78)

Result Notes Reviewed construction job @ 3344 NE Everett St. hydrotest test performed by Mike Morgan, 8" steel, .322 WT, X52, recorder 1190625, 875psig from 0700-1600. Pressure test was performed July 2023.

42. Question Result, ID, References Sat, DC.PT.SERVICELINE.R, 192.517(b) (192.511(a), 192.511(b), 192.511(c))

Question Text Do records indicate that pressure testing is conducted in accordance with 192.511?

Assets Covered 90888 (78)

Result Notes Reviewed pressure tests for a sampling of steel jobs for 2021-2023, records were adequate.

43. Question Result, ID, References Sat, DC.PLASTIC.PRESSTESTPLASTIC.R, 192.517(b) (192.513(a), 192.513(b), 192.513(c), 192.513(d))

Question Text Do records indicate that pressure testing is conducted in accordance with 192.513?

Assets Covered 90888 (78)

Result Notes Reviewed pressure tests for a sampling of PE jobs for 2021-2023, records were adequate.

## PRR.UPRATE: Uprating

44. Question Result, ID, References NA, MO.GOUPRATE.MAOPINCREASE.R, 192.553(a) (192.553(b), 192.553(c))

Question Text Do records indicate that increases in MAOP of pipeline were determined in accordance with 192.553?

Assets Covered 90888 (78)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

45. Question Result, ID, References NA, MO.GOUPRATE.MAOPINCREASELIMIT.R, 192.553(b) (192.553(c), 192.553(d), 192.557(a))

Question Text Do records indicate that increases in MAOP are limited in accordance with 192.619 and 192.621?

Assets Covered 90888 (78)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

46. Question Result, ID, References NA, MO.GOUPRATE.MAOPINCREASEPREP.R, 192.553(b) (192.553(c), 192.553(a), 192.557(b), 192.557(c))

Question Text Do records indicate that increases in MAOP were preceded by the actions specified in 192.557?

Assets Covered 90888 (78)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

## PRR.OM: Operations And Maintenance

47. Question Result, ID, References Sat, MO.GO.OMANNUALREVIEW.R, 192.605(a)

Question Text Have annual reviews of the written procedures or processes in the manual been conducted as required?

Assets Covered 90888 (78)

Result Notes NWN SPW (Standard Practices Washington) 000, Section 3.3. Reviewed manual revision logs for 2021-2023, annual reviews were performed for all NWN manuals.

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

Question Text Are construction records, maps and operating history available to appropriate operating personnel?

Assets Covered 90888 (78)



- Result Notes Reviewed as-builts for new subdivision, Grealy Farms. Job done 11/2022, as-builts uploaded 3/16/23. Also a job performed 5/5/21, uploaded 6/9/21. Samples of other jobs were checked and were adequate. Operating personnel can access IQGeo for records digitally.
49. Question Result, ID, References Sat, MO.GO.OMEFFECTREVIEW.R, 192.605(a) (192.605(b)(8))  
 Question Text *Do records indicate periodic review of 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 90888 (78)  
 Result Notes Reviewed NWN QA Summary Report for construction jobs, 2021-2023. Also reviewed the Field Operations QA Checklist. No deficiencies
50. Question Result, ID, References Sat, EP.ERG.POSTEVTREVIEW.R, 192.605(a) (192.615(b)(1), 192.615(b)(3))  
 Question Text *Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency?*  
 Assets Covered 90888 (78)  
 Result Notes Reviewed NWN QA reports.
51. Question Result, ID, References Sat, EP.ERG.TRAINING.R, 192.605(a) (192.615(b)(2))  
 Question Text *Has the operator trained the appropriate operating personnel on emergency procedures and verified that the training was effective in accordance with its procedures?*  
 Assets Covered 90888 (78)  
 Result Notes Reviewed training QA report and emergency response attendance logs.
52. Question Result, ID, References Sat, EP.ERG.LIAISON.R, 192.603(b) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-2005-03) (also presented in: MISCTOPICS.PUBAWARE)  
 Question Text *Do records indicate liaisons established and maintained with appropriate fire, police, other public officials, and 911 emergency call centers in accordance with procedures?*  
 Assets Covered 90888 (78)  
 Result Notes Reviewed NWN liaison lists for first responders, other public officials and 911 call centers. 2021-2023
53. Question Result, ID, References Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1) (also presented in: MISCTOPICS.PUBAWARE)  
 Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*  
 Assets Covered 90888 (78)  
 Result Notes NWN PA mailers are sent in English and Spanish. Demographics from the 2020 Census used.
54. Question Result, ID, References Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4) (also presented in: MISCTOPICS.PUBAWARE)  
 Question Text *Do records indicate program effectiveness evaluation(s) have been performed and cover all program requirements and all systems covered by the program?*  
 Assets Covered 90888 (78)  
 Result Notes NWN performs an annual effectiveness review on their PA plan internally. NWN PA plan section 8.3. Reviewed NWN powerpoint report for effectiveness for 2022.
55. Question Result, ID, References NA, EP.ERG.INCIDENTANALYSIS.R, 192.605(a) (192.617)  
 Question Text *Do records indicate actions initiated to analyze accidents and failures, including the collection of appropriate samples for laboratory examination to determine the causes of the failure and minimize the possibility of recurrence, in accordance with its procedures?*  
 Assets Covered 90888 (78)  
 Result Notes No such event occurred, or condition existed, in the scope of inspection review.
56. Question Result, ID, References Sat, PD.DP.PDPROGRAM.R, 192.614(c)  
 Question Text *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*  
 Assets Covered 90888 (78)

- Result Notes Reviewed Mailers sent to contractors regarding 811. Reviewed a sampling of locate requests, marks were down within 2 days.
57. Question Result, ID, References Sat, MO.GOMAOP.MAOPDETERMINE.R, 192.619(a) (192.619(b), 192.621(a), 192.621(b), 192.623(a), 192.623(b))  
 Question Text *Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required?*  
 Assets Covered 90888 (78)  
 Result Notes Reviewed a sampling of NWN Design and Pressure Test Documentation forms for different jobs from 2021-2023.
58. Question Result, ID, References Sat, MO.GOODOR.ODORIZE.R, 192.709(c) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))  
 Question Text *Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?*  
 Assets Covered 90888 (78)  
 Result Notes Reviewed NWN Odorant Monitor Inspection forms, numbers were within the required limits and done monthly, 2021-2023 were checked. Checked OQs for technicians Shane Macias-Williams, expiration 3/2025, and Michael Frilot, expiration 5/2024.
59. Question Result, ID, References Sat, MO.RW.DISTPATROL.R, 192.603(b) (192.721(a), 192.721(b))  
 Question Text *Do records indicate distribution patrolling was conducted as required?*  
 Assets Covered 90888 (78)  
 Result Notes Reviewed NWN leak survey inspection reports. Patrolling was done within the required timeframes for mains and services.
60. Question Result, ID, References Sat, MO.RW.LEAKFOLLOW.R,  
 Question Text *Do records indicate that a follow-up inspection was performed not more than thirty days following a repair where residual gas remained in the ground?*  
 Assets Covered 90888 (78)  
 Result Notes Reviewed NWN leak follow-up inspection form. All leaks that required follow-up were repaired or mitigated within 30 days.
61. Question Result, ID, References NA, MO.RW.DOWNGRADELEAKREPAIR.R,  
 Question Text *Do records indicate that leaks that have been downgraded are repaired within twenty-one months?*  
 Assets Covered 90888 (78)  
 Result Notes No such event occurred, or condition existed, in the scope of inspection review.
62. Question Result, ID, References Sat, MO.RW.LEAKREPAIRTIME.R,  
 Question Text *Do records indicate that leaks were repaired and re-evaluated in the timeframes specified in WAC 480-93-18601?*  
 Assets Covered 90888 (78)  
 Result Notes Reviewed NWN leak follow-up inspection form. Also reviewed a sampling of leaks that were repaired or re-evaluated within the required timeframes.
63. Question Result, ID, References Sat, MO.RW.LEAKRECORDS.R,  
 Question Text *Have gas leak records been prepared and maintained as required?*  
 Assets Covered 90888 (78)  
 Result Notes Reviewed multiple leak survey plat maps. Gas leak records were adequate.
64. Question Result, ID, References Sat, MO.RW.DISTPATROLLEAKAGE.R, 192.603(b) (192.723(a), 192.723(b))  
 Question Text *Do records indicate distribution leakage surveys were conducted as required?*  
 Assets Covered 90888 (78)  
 Result Notes Reviewed multiple NWN main and service plat maps for 2021-2023, records were adequate.

65. Question Result, ID, References **NA, MO.RW.CASINGLEAKSURVEY.R,**  
 Question Text *Do records indicate shorted casings were leak surveyed as required?*  
 Assets Covered **90888 (78)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. No shorted cassings.**
66. Question Result, ID, References **Sat, MO.RW.MARKERSURVEY.R,**  
 Question Text *Do records indicate that pipeline marker surveys were completed in the timeframe specified by WAC 480-93-124?*  
 Assets Covered **90888 (78)**  
 Result Notes **Reviewed NWN Bridgeline Inspection Reports and other pipeline marker surveys, all inspections were done within the required interval and replaced if needed.**
67. Question Result, ID, References **Sat, MO.RW.MARKERREPLACE.R,**  
 Question Text *Do records indicate that damaged or missing markers were replaced within forty-five days of discovery?*  
 Assets Covered **90888 (78)**  
 Result Notes **Reviewed NWN Bridgeline Inspection Reports and other pipeline marker surveys. Markers are replaced as identified.**
68. Question Result, ID, References **Sat, AR.RMP.TESTREINSTATE.R, 192.603(b) (192.725(a), 192.725(b))**  
 Question Text *From the review of records, did the operator properly test disconnected service lines?*  
 Assets Covered **90888 (78)**  
 Result Notes **Reviewed a sampling damaged service line jobs, service lines were properly tested after repair.**
69. Question Result, ID, References **Sat, MO.GM.ABANDONPIPE.R, 192.709(c) (192.727(a), 192.727(b), 192.727(c), 192.727(d), 192.727(e), 192.727(f), 192.727(g))**  
 Question Text *Do records indicate pipelines and facilities were abandoned or deactivated in accordance with requirements?*  
 Assets Covered **90888 (78)**  
 Result Notes **Reviewed a sampling of service and main abandonment jobs from 2021-2023.**
70. Question Result, ID, References **Sat, MO.GMOPP.PRESSREGTEST.R, 192.709(c) (192.739(a), 192.739(b))**  
 Question Text *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?*  
 Assets Covered **90888 (78)**  
 Result Notes **Reviewed NWN district regulator inspections. Checks were done within the required time interval for 2021-2023.**
71. Question Result, ID, References **Sat, MO.GMOPP.PRESSREGCAP.R, 192.709(c) (192.743(a), 192.743(b), 192.743(c))**  
 Question Text *Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required?*  
 Assets Covered **90888 (78)**  
 Result Notes **Reviewed NWN reg-relief inspections, capacity calculations were adequate and done within the required timeframe, 2021-2023.**
72. Question Result, ID, References **Sat, DC.METERREGSVC.REGTEST.R,**  
 Question Text *Do records indicate that service regulators have been installed, operated, maintained, tested during initial turn-on and tested when customers experience pressure problems?*  
 Assets Covered **90888 (78)**  
 Result Notes **Reviewed a sampling of NWN CFS General forms for 2021-2023.**
73. Question Result, ID, References **Sat, MO.GM.DISTVALVEINSPECT.R, 192.603(b) (192.747(a), 192.747(b))**  
 Question Text *Do records indicate proper inspection of each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year, and prompt remedial action to correct any valve found inoperable?*

Assets Covered 90888 (78)

Result Notes Reviewed NWN distribution valve inspections. Records indicated that valves were checked within the required time interval, 2021-2023.

74. Question Result, ID, References Sat, MO.GM.IGNITION.R, 192.709 (192.751(a), 192.751(b), 192.751(c))

Question Text *Do records indicate personnel followed processes for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion?*

Assets Covered 90888 (78)

Result Notes Reviewed a sampling of NWN QA reports.

75. Question Result, ID, References Sat, DC.DPC.FLANGE.R, 192.147(a) (192.147(b), 192.147(c))

Question Text *Do records indicate flanges and flange accessories meet the requirements of 192.147?*

Assets Covered 90888 (78)

Result Notes Reviewed sample jobs that required flanges, all flanges met the requirements of 192.147.

76. Question Result, ID, References Sat, DC.WELDPROCEDURE.WELD.R, 192.225(a) (192.225(b))

Question Text *Do records indicate weld procedures are being qualified in accordance with 192.225?*

Assets Covered 90888 (78)

Result Notes NWN welding procedures were qualified by Cory C. Fisher, AWS-CWI 21040331, QC1 exp. 4/1/24. Procedure dated 2/21/23

77. Question Result, ID, References Sat, DC.WELDPROCEDURE.ESSENTIAL.R,

Question Text *Do records indicate that essential variables were measured and documented when welders and procedures were qualified?*

Assets Covered 90888 (78)

Result Notes Weld procedures were signed off by Cory Fisher AWS CWI 21040331, expiration 4/1/2024. Essential variables are in the NWN welding certification procedure.

78. Question Result, ID, References Sat, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))

Question Text *Do records indicate adequate qualification of welders?*

Assets Covered 90888 (78)

Result Notes Reviewed initial welder qualifications for a sampling NWN welders. The NWN Coaching Report is where this is documented.

79. Question Result, ID, References Sat, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))

Question Text *Do records indicate the qualification of nondestructive testing personnel?*

Assets Covered 90888 (78)

Result Notes Reviewed NDT technicians qualifications:

William McCreary, Acuren, Level II -- MT exp. 2/2025, PMI X-Ray exp. 3/2027, PT exp. 2/2025, RT exp. 3/2027, UT exp. 9/2026

Daniel Hubbard, Acuren, Level II -- MT exp. 3/2027, PT exp. 10/2025, RT exp. 9/2024, RT-CR exp. 2/2027, RT-DR exp. 2/2027

80. Question Result, ID, References Sat, DC.PLASTIC.PLASTICJOINTPROCEDURE.R, 192.273(b) (192.283(a), 192.283(b), 192.283(c))

Question Text *Have plastic pipe joining procedures been qualified in accordance with 192.283?*

Assets Covered 90888 (78)

Result Notes NWN FOM Joining PE pipe.

81. Question Result, ID, References Sat, DC.PLASTIC.PLASTICJOINTQUAL.R, 192.285(d) (192.285(a), 192.285(b), 192.285(c), 192.285(e), 192.807(a), 192.807(b))

Question Text *Do records indicate persons making joints in plastic pipelines are qualified in accordance with §192.285?*

Assets Covered 90888 (78)

Result Notes Reviewed OQs for Rusty Grable and Randy Boespflug. OQs were adequate for both.

82. Question Result, ID, References Sat, DC.PLASTIC.PLASTICJOINTINSR.R, 192.287 (192.807(a), 192.807(b))  
Question Text *Do records indicate persons inspecting the making of plastic pipe joints have been qualified?*  
Assets Covered 90888 (78)  
Result Notes Reviewed OQs for Rusty Grable and Randy Boespflug qualifications were reviewed for plastic joint inspection. 8/30/24 expiration for Randy and Rusty, AOC08.
83. Question Result, ID, References NA, DC.CO.PLASTICPIPESEP.R,  
Question Text *Do records indicate minimum separation requirements are met for plastic pipelines?*  
Assets Covered 90888 (78)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
84. Question Result, ID, References Sat, MO.GM.EQUIPPLASTICJOINT.R, 192.603(b) (192.756)  
Question Text *Do records indicate equipment used in joining plastic pipe by heat fusion was maintained 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 90888 (78)  
Result Notes NWN FOM Maintaining Number 14 Butt Fusion Machines. Also reviewed QA reports that include fusion machine properly maintained.
85. Question Result, ID, References Sat, MO.RW.BUSINESSDIST.R, 192.723(b)(1) (192.721(b)(1), 192.723(a), 192.613)  
Question Text *Do the records clearly identify the areas of operator's distribution system that are considered Business Districts?*  
Assets Covered 90888 (78)  
Result Notes Reviewed NWN maps that define where business districts are in their system, also reviewed NWNs definition of business district, SPO 001.
86. Question Result, ID, References NA, MO.GM.MOVEANDLOWER.R,  
Question Text *Do records indicate that a study was prepared before moving or lowering a steel gas pipeline as required?*  
Assets Covered 90888 (78)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
87. Question Result, ID, References NA, MO.GM.MOVEANDLOWERSURVEY.R,  
Question Text *Do records indicate that a leak survey was conducted not more than thirty days after moving and/or lowering a metallic pipeline?*  
Assets Covered 90888 (78)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
88. Question Result, ID, References Sat, MO.RW.MARKERSMAPSDRAW.R,  
Question Text *Are records sufficient to indicate class location and other areas where pipeline markers are required?*  
Assets Covered 90888 (78)  
Result Notes Reviewed NWN urban growth area maps.
89. Question Result, ID, References Sat, PD.DP.EXCAVATEMARK.R, 192.614(c)(5)  
Question Text *Do records indicate that marking proposed excavation sites was completed within two business days and in accordance with RCW 19.122?*  
Assets Covered 90888 (78)  
Result Notes Reviewed a sampling of locate requests, all were performed within 2 business days.

## FR.FIELDPIPE: Pipeline Inspection (Field)

90. Question Result, ID, References **NA, DC.MA.MARKING.O, 192.63(a) (192.63(b), 192.63(c), 192.63(d))**  
 Question Text *Are pipe, valves, and fittings properly marked for identification in accordance with the requirements of 192.63?*  
 Assets Covered **90888 (78)**  
 Result Notes **No such activity/condition was observed during the inspection.**
91. Question Result, ID, References **NA, DC.DPC.FLANGE.O, 192.141 (192.147(a), 192.147(b), 192.147(c))**  
 Question Text *Do flanges and flange accessories meet the requirements of 192.147?*  
 Assets Covered **90888 (78)**  
 Result Notes **No such activity/condition was observed during the inspection.**
92. Question Result, ID, References **NA, DC.DPC.GDVALVEPLACEMENT.O, 192.141 (192.181(a), 192.181(b), 192.181(c))**  
 Question Text *Are distribution line valves being installed as required of 192.181?*  
 Assets Covered **90888 (78)**  
 Result Notes **No such activity/condition was observed during the inspection.**
93. Question Result, ID, References **Sat, DC.CO.PLASTICPIPEPROC.O,**  
 Question Text *Is plastic pipe handled, stored and installed in accordance with manufacturer's recommendations, including maximum ultraviolet exposure?*  
 Assets Covered **90888 (78)**  
 Result Notes **Smaller diameter pipe is stored under cover and wrapped, larger diameter is covered.**
94. Question Result, ID, References **NA, DC.CO.PLASTICPIPESEP.O,**  
 Question Text *Are plastic pipelines installed with the minimum separation from other utilities as required?*  
 Assets Covered **90888 (78)**  
 Result Notes **No such activity/condition was observed during the inspection.**
95. Question Result, ID, References **NA, DC.CO.PLASTICBACKFILL.O,**  
 Question Text *Is plastic pipe buried in essentially rock-free material or material recommended by the pipe manufacturer?*  
 Assets Covered **90888 (78)**  
 Result Notes **No such activity/condition was observed during the inspection.**
96. Question Result, ID, References **NA, DC.CO.PLASTICSQUEEZING.O,**  
 Question Text *Verify that the operator has limits in place for squeezing plastic pipe.*  
 Assets Covered **90888 (78)**  
 Result Notes **No such activity/condition was observed during the inspection.**
97. Question Result, ID, References **NA, DC.METERREGSVC.CUSTOMETERREGLOC.O, 192.351 (192.353(a), 192.353(b), 192.353(c), 192.353(d))**  
 Question Text *Are meters and service regulators being located consistent with the requirements of 192.353?*  
 Assets Covered **90888 (78)**  
 Result Notes **No such activity/condition was observed during the inspection.**
98. Question Result, ID, References **NA, DC.METERREGSVC.CUSTOMETERREGPROT.O, 192.351 (192.355(a), 192.355(b), 192.355(c))**  
 Question Text *Are meters and service regulators being protected from damage consistent with the requirements of 192.355?*  
 Assets Covered **90888 (78)**  
 Result Notes **No such activity/condition was observed during the inspection.**
99. Question Result, ID, References **NA, DC.METERREGSVC.CUSTOMETERREGINSTALL.O, 192.351 (192.357(a), 192.357(b), 192.357(c), 192.357(d))**



Question Text *Based on the meters and service regulators observed being installed, are the installations consistent with the requirements of §192.357?*

Assets Covered 90888 (78)

Result Notes No such activity/condition was observed during the inspection.

100. Question Result, ID, NA, DC.METERREGSVC.CUSTOMETEROPPRESS.O, 192.351 (192.359(a), 192.359(b), 192.359(c))  
References

Question Text *Are customer meter operating pressures consistent with the requirements of 192.359?*

Assets Covered 90888 (78)

Result Notes No such activity/condition was observed during the inspection.

101. Question Result, ID, NA, DC.METERREGSVC.SVCLINEINSTALL.O, 192.351 (192.361(a), 192.361(b), 192.361(c), 192.361(d),  
References 192.361(e), 192.361(f), 192.361(g))

Question Text *Are customer service lines being installed consistent with the requirements of 192.361?*

Assets Covered 90888 (78)

Result Notes No such activity/condition was observed during the inspection.

102. Question Result, ID, NA, DC.METERREGSVC.SVCLINEVLVLOCATEREQT.O, 192.351 (192.363(a), 192.363(b), 192.363(c),  
References 192.365(a), 192.365(b), 192.365(c))

Question Text *Are customer service line valves being installed meeting the valve and locations requirements of 192.363 and 192.365?*

Assets Covered 90888 (78)

Result Notes No such activity/condition was observed during the inspection.

103. Question Result, ID, NA, DC.METERREGSVC.SVCLINECONNECT.O, 192.351 (192.367(a), 192.367(b), 192.369(a), 192.369(b))  
References

Question Text *Are customer service lines being installed with connections meeting the requirements of 192.367 and 192.369?*

Assets Covered 90888 (78)

Result Notes No such activity/condition was observed during the inspection.

104. Question Result, ID, NA, DC.METERREGSVC.SVCLINEMATERIAL.O, 192.351 (192.371, 192.373(a), 192.373(b), 192.373(c),  
References 192.375(a), 192.375(b), 192.377)

Question Text *Are customer service lines being installed constructed appropriately for the types of materials used?*

Assets Covered 90888 (78)

Result Notes No such activity/condition was observed during the inspection.

105. Question Result, ID, NA, DC.METERREGSVC.NEWSVCLINENOTUSED.O, 192.351 (192.379, 192.379(a), 192.379(b),  
References 192.379(c))

Question Text *Are new customer service lines not in use configured in accordance with the requirements of 192.379?*

Assets Covered 90888 (78)

Result Notes No such activity/condition was observed during the inspection.

106. Question Result, ID, NA, DC.METERREGSVC.EXCSFLOWVLVLOCATE.O, 192.351 (192.381(c), 192.381(d), 192.381(e))  
References

Question Text *Are service line excess flow valves located and identified in accordance with the requirements of 192.381?*

Assets Covered 90888 (78)

Result Notes No such activity/condition was observed during the inspection.

107. Question Result, ID, NA, DC.METERREGSVC.REGTEST.O,  
References

Question Text *Are service regulators operated, maintained, installed and tested during the initial turn-on in accordance with manufacturer's recommendations and WAC requirements?*

Assets Covered 90888 (78)

Result Notes No such activity/condition was observed during the inspection.

108. Question Result, ID, NA, DC.WELDPROCEDURE.ONSITE.O,  
References

Question Text *Are qualified written welding procedures located onsite where welding is being performed?*

Assets Covered 90888 (78)



Result Notes No such activity/condition was observed during the inspection.

109. Question Result, ID, References NA, DC.WELDPROCEDURE.ESSENTIAL.O,

Question Text *Does the operator document essential variables when qualifying welders and weld procedures?*

Assets Covered 90888 (78)

Result Notes No such activity/condition was observed during the inspection.

110. Question Result, ID, References NA, TD.COAT.NEWPIPEINSTALL.O, 192.461(d)

Question Text *Is external protective coating being protected from damage that could result from adverse ditch conditions or supporting blocks?*

Assets Covered 90888 (78)

Result Notes No such activity/condition was observed during the inspection.

111. Question Result, ID, References Sat, TD.CPMONITOR.MONITORCRITERIA.O, 192.465(a) (192.463(b), 192.463(c), 192.463(a))

Question Text *Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?*

Assets Covered 90888 (78)

Result Notes See attached field notes for CP readings. Reads were taken IR free.

112. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.O, 192.465(b)

Question Text *Do field observations confirm impressed current sources are properly maintained and are functioning properly?*

Assets Covered 90888 (78)

Result Notes John Goebel performed all CP related functions, see attached field notes for results. John's OQ expiration is 11/6/24 for all CP related tasks.

113. Question Result, ID, References Sat, TD.CP.ELECISOLATE.O, 192.467(a) (192.467(b), 192.467(c), 192.467(d), 192.467(e))

Question Text *Are measures performed to ensure electrical isolation of 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 90888 (78)

Result Notes John Goebel performed, see attached field notes for results. John's OQ expiration is 11/6/24 for all CP related tasks.

114. Question Result, ID, References Sat, TD.CP.ELECISOLATETEST.O, 192.467(d)

Question Text *Do field observations verify that inspection and electrical testing ensured that electrical isolation is adequate?*

Assets Covered 90888 (78)

Result Notes John Goebel performed, see attached field notes for results. John's OQ expiration is 11/6/24 for all CP related tasks.

115. Question Result, ID, References Sat, TD.CP.CASINGINSPECT.O,

Question Text *Are casings electrically isolated from the pipeline?*

Assets Covered 90888 (78)

Result Notes John Goebel performed, see attached field notes for results.

116. Question Result, ID, References Sat, TD.CPMONITOR.TESTSTATION.O, 192.469

Question Text *Do cathodically protected pipelines have a sufficient number of test stations?*

Assets Covered 90888 (78)

Result Notes Test stations were adequate.

117. Question Result, ID, References Sat, TD.CPMONITOR.TESTLEAD.O, 192.471(a)

Question Text *Do pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?*

Assets Covered 90888 (78)

Result Notes Test leads were installed IAW Subpart I.

118. Question Result, ID, NA, TD.CPMONITOR.INTFCURRENT.O, 192.473(a)  
References

Question Text *Are areas of potential stray current identified, and if found, the detrimental effects of stray currents minimized?*

Assets Covered 90888 (78)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

119. Question Result, ID, NA, TD.ICP.CORRGASPRVNT.O, 192.475(a)  
References

Question Text *If the transportation of corrosive gas is not allowed, is the transportation of corrosive gas prevented?*

Assets Covered 90888 (78)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

120. Question Result, ID, NA, TD.ICP.CORRGASACTION.O, 192.477  
References

Question Text *Are adequate actions taken when corrosive gas is being transported by pipeline?*

Assets Covered 90888 (78)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

121. Question Result, ID, Sat, TD.ATM.ATMCORRODEINSP.O, 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c),  
References 192.481(d))

Question Text *Do field observations indicate that pipe exposed to atmospheric corrosion is properly coated?*

Assets Covered 90888 (78)

Result Notes Where observed, the soil-to-air interface was adequate.

122. Question Result, ID, NA, PD.DP.ONECALL.O, 192.614(c)(3)  
References

Question Text *Observe operator process a "One Call" ticket.*

Assets Covered 90888 (78)

Result Notes No such activity/condition was observed during the inspection.

123. Question Result, ID, Sat, MO.GOODOR.ODORIZE.O, 192.625(a) (192.625(c), 192.625(d), 192.625(e), 192.625(f))  
References

Question Text *Is sampling of combustible gases adequate using an instrument capable of determining the percentage of gas in air at which it becomes readily detectable?*

Assets Covered 90888 (78)

Result Notes Jesse Ekerson performed odorant reads OQ exp. 6/19/25

Odorometer DX1000-G exp. 7/10/25

All reads were within the required limits. See field notes in attachments

124. Question Result, ID, NA, MO.GO.PURGE.O, 192.629(a) (192.629(b))  
References

Question Text *Are lines being purged in accordance with 192.629?*

Assets Covered 90888 (78)

Result Notes No such activity/condition was observed during the inspection.

125. Question Result, ID, Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(d), CGA Best Practices, v4.0, Practice 2-  
References 5, CGA Best Practices, v4.0, Practice 4-20)

Question Text *Are line markers placed and maintained as required?*

Assets Covered 90888 (78)

Result Notes Markers were placed and maintained as required.

126. Question Result, ID, Sat, MO.RW.ROWMARKERABOVE.O, 192.707(c) (CGA Best Practices, v4.0, Practice 2-5, CGA Best  
References Practices, v4.0, Practice 4-20)

Question Text *Are line markers placed and maintained as required for above ground pipelines?*

Assets Covered 90888 (78)

Result Notes Markers were placed and maintained at bridges that were observed.

127. Question Result, ID, References Sat, MO.GMOPP.PRESSREGTEST.O, 192.739(a) (192.739(b))

Question Text *Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?*

Assets Covered 90888 (78)

Result Notes Pressure control was performed by Jon Huitt exp. 6/27/2024 and Andrew Mogil exp. 6/26/24. See attached field notes for results.

128. Question Result, ID, References NA, MO.GMOPP.PRESSREGMETER.O, 192.741(a) (192.741(b), 192.741(c))

Question Text *Are telemetering or recording gauges properly utilized as required for distribution systems?*

Assets Covered 90888 (78)

Result Notes No such activity/condition was observed during the inspection.

129. Question Result, ID, References NA, MO.GMOPP.MULTIPRESSREG.O,

Question Text *Are regulator stations installed in a manner to provide protection between regulator stages?*

Assets Covered 90888 (78)

Result Notes No such activity/condition was observed during the inspection.

130. Question Result, ID, References Sat, MO.GM.DISTVALVEINSPECT.O, 192.747(a) (192.747(b))

Question Text *Is proper inspection being performed for each distribution system valve that might be required in an emergency, and prompt remedial action to correct any valves found inoperable?*

Assets Covered 90888 (78)

Result Notes Valve operation was performed by Mark McClelland exp. 9/13/24 and Zach Johnson exp. 9/17/24. All valves operated properly, see attached field notes.

131. Question Result, ID, References Sat, FS.FG.CASING.O,

Question Text *Are all casings bare steel and do they have test leads installed on new casings without vents?*

Assets Covered 90888 (78)

Result Notes Test leads were adequately installed on all observed casings. All casings had vents.

132. Question Result, ID, References NA, FS.FG.CASESEAL.O,

Question Text *Does the operator seal both ends of casings/conduits for mains and transmission lines and seal the end nearest the building for service lines?*

Assets Covered 90888 (78)

Result Notes No such activity/condition was observed during the inspection.

133. Question Result, ID, References NA, AR.RMP.IGNITION.O, 192.751(a) (192.751(b), 192.751(c))

Question Text *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.*

Assets Covered 90888 (78)

Result Notes No such activity/condition was observed during the inspection.

134. Question Result, ID, References NA, DC.PLASTIC.PLASTICWEAKLINK.O, 192.329(b) (192.376(b), 192.303)

Question Text *Do field observations confirm plastic lines and plastic service lines are being installed using a "weak link" (as defined by §192.3) to ensure the pipeline will not be damaged by any excessive forces during the pulling process?*

Assets Covered 90888 (78)

Result Notes No such activity/condition was observed during the inspection.

135. Question Result, ID, References **NA, MO.GM.EQUIPPLASTICJOINT.O, 192.756**  
 Question Text *Is proper maintenance being performed on equipment used in joining plastic pipe by heat fusion 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 **90888 (78)**  
 Result Notes **No such activity/condition was observed during the inspection.**
136. Question Result, ID, References **Sat, MO.GM.ONSITEPROCS.O,**  
 Question Text *Are procedures applicable to the work being done located onsite where the work is being done?*  
 Assets Covered **90888 (78)**  
 Result Notes **Field technicians have procedures available.**
137. Question Result, ID, References **Sat, MO.RW.BUSINESSDIST.O, 192.723(b)(1) (192.721(b)(1), 192.723(a), 192.613)**  
 Question Text *Do field observations indicate Business Districts are properly identified?*  
 Assets Covered **90888 (78)**  
 Result Notes **Business districts were properly identified.**
138. Question Result, ID, References **NA, AR.PTI.PLASTICPRESSURETEST.O,**  
 Question Text *Is plastic pipe installed and backfilled prior to pressure testing?*  
 Assets Covered **90888 (78)**  
 Result Notes **No such activity/condition was observed during the inspection.**
139. Question Result, ID, References **NA, AR.PTI.EQUIPCALIB.O,**  
 Question Text *Is pressure testing equipment calibrated according to calibration schedules and procedures?*  
 Assets Covered **90888 (78)**  
 Result Notes **No such activity/condition was observed during the inspection.**

## **MISCTOPICS.PROT9: OQ Field Inspection**

140. Question Result, ID, References **NA, TQ.PROT9.CORRECTION.O, 192.801(a) (192.809(a))**  
 Question Text *Have potential issues identified by the OQ plan inspection process been corrected at the operational level?*  
 Assets Covered **90888 (78)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
141. Question Result, ID, References **Sat, TQ.PROT9.QUALIFICATIONSTATUS.O, 192.801(a) (192.809(a))**  
 Question Text *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.*  
 Assets Covered **90888 (78)**  
 Result Notes **CP related tasks were performed by John Goebel**
142. Question Result, ID, References **Sat, TQ.PROT9.TASKPERFORMANCE.O, 192.801(a) (192.809(a))**  
 Question Text *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.*  
 Assets Covered **90888 (78)**  
 Result Notes **NWN field staff performed their covered tasks IAW company procedures.**
143. Question Result, ID, References **Sat, TQ.PROT9.AOCRECOG.O, 192.801(a) (192.809(a))**  
 Question Text *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.*  
 Assets Covered **90888 (78)**

Result Notes When asked NWN field staff was cognizant of applicable AOCs.

144. Question Result, ID, References Sat, TQ.PROT9.VERIFYQUAL.O, 192.801(a) (192.809(a))

Question Text *Observe in the field (job site, local office, etc.) that the foreman/supervisor/manager has verified the qualification of the individual performing the task, that the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.*

Assets Covered 90888 (78)

Result Notes **Valve Operation**

Mark McClelland exp. 9/13/24

Zach Johnson exp. 9/17/24

**Bridgeline Inspection**

Darren Bauld 3/18/25

**CP Related Tasks**

John Goebel 11/6/24

**Odorant Monitoring**

Jesse Ekerson exp. 6/19/25

**Pressure Control**

Jon Huitt exp. 6/27/2024

Andrew Mogil exp. 6/26/24

## MISCTOPICS.OPTRQUAL: Operator Qualification

145. Question Result, ID, References Sat, TQ.OQ.OQPLAN.O, 192.805(h)

Question Text *Do individuals performing covered tasks demonstrate adequate skills, knowledge, and ability?*

Assets Covered 90888 (78)

Result Notes NWN field staff demonstrated adequate KSAs when performing covered tasks.

146. Question Result, ID, References Sat, TQ.OQ.RECORDS.R, 192.807

Question Text *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*

Assets Covered 90888 (78)

Result Notes Reviewed OQ task list for Mark McClelland his OQ expirations are 9/2024, also reviewed CP and valve technician OQs and they were adequate.

147. Question Result, ID, References Sat, TQ.OQ.TRAINING.R, 192.807(a) (192.807(b))

Question Text *Does the operator have records for initial qualification, retraining and reevaluation of individuals performing covered tasks?*

Assets Covered 90888 (78)

Result Notes Reviewed NWN employees, Lamont Wilkins, and Mitchell Stemmerman initial, retraining, and reevaluations.

148. Question Result, ID, References Sat, TQ.OQ.OQCONTRACTOR.R, 192.807(a) (192.807(b))

Question Text *Are adequate records containing the required elements maintained for contractor personnel?*

Assets Covered 90888 (78)

Result Notes NWN uses service contractor Loy Clark. Reviewed a sampling of OQs for employees, all were up to date and adequate.

Cameron Mitchell exp. 4/17/24 for multiple tasks.

149. Question Result, ID, References Sat, TQ.OQ.ABNORMAL.R, 192.807(a) (192.807(b), 192.803)

Question Text *Do records document evaluation of qualified individuals for recognition and reaction to AOCs?*

Assets Covered 90888 (78)

Result Notes Reviewed OQ task lists for Rusty Grable, recognition and reaction to AOCs were included.

150. Question Result, ID, References Sat, TQ.OQ.ABNORMAL.O, 192.803

Question Text *Do individuals performing covered tasks have adequate knowledge to recognize and react to abnormal operating conditions?*

Assets Covered 90888 (78)

Result Notes NWN field staff had adequate knowledge of AOCs.

## MISCTOPICS.PUBAWARE: Public Awareness Program Effectiveness

151. Question Result, ID, References Sat, EP.ERG.LIAISON.R, 192.603(b) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-2005-03) (also presented in: PRR.OM)

Question Text *Do records indicate liaisons established and maintained with appropriate fire, police, other public officials, and 911 emergency call centers in accordance with procedures?*

Assets Covered 90888 (78)

Result Notes Reviewed NWN liaison lists for first responders, other public officials and 911 call centers. 2021-2023

152. Question Result, ID, References Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1) (also presented in: PRR.OM)

Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*

Assets Covered 90888 (78)

Result Notes NWN PA mailers are sent in English and Spanish. Demographics from the 2020 Census used.

153. Question Result, ID, References Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4) (also presented in: PRR.OM)

Question Text *Do records indicate program effectiveness evaluation(s) have been performed and cover all program requirements and all systems covered by the program?*

Assets Covered 90888 (78)

Result Notes NWN performs an annual effectiveness review on their PA plan internally. NWN PA plan section 8.3. Reviewed NWN powerpoint report for effectiveness for 2022.

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 C 8800**

UTC Standard Inspection Report  
 Intrastate Gas Distribution  
 R C - State Statutes and Rules  
 Records Review and Field Inspections

## Inspector and Operator Information

<b>Inspection Link</b> 8800	<b>Inspector - Lead</b> Anderson, Scott	<b>Inspector - Assist</b>
<b>Operator</b> NW Natural Gas	<b>Unit</b> Clark County	<b>Records Location - City &amp; State</b> Vancouver, WA
<b>Inspection Start Date</b> 04-15-2024	<b>Inspection Exit Interview Date</b> 04-18-2024	<b>Engineer Submit Date</b> 04-30-2024

### Inspection Summary Inspection Scope and Summary

This inspection consisted of a records and field review of Northwest Natural Gas (NWN) Clark County District for inspection years 2021-2023. It was conducted primarily in this application (IA), but some additional Washington State questions were completed in the UTC's inspection system.

#### Facilities visited and Total AFOD

4 AFOD

#### Summary of Significant Findings

2 probable violations in the IA checklist:

See question [TD.CPEXPOSED.EXPOSEINSPECT.R](#) regarding WAC 480-93-110(8), the operator did not take pipe-to-soil readings when the pipe was exposed.

See question [FS.FG.CASINGSEALS.R](#) regarding WAC 480-93-115(4)(5), the sealing of mains or services in a conduit or casing.

#### Primary Operator contacts and/or participants

Ryan Truair, Compliance Senior Manager, NW Natural Gas

Samantha Rookstool, Compliance Specialist, NW Natural Gas

Andy Fortier, Compliance Engineer, NW Natural Gas

Ben Stiles, Field Operations Supervisor, NW Natural Gas

Ryan Winfree, Area Engineer, NW Natural Gas

JC Sanchez, Area Engineer, NW Natural Gas

#### Operator executive contact and mailing address for any official correspondence

Joe Karney

VP of Engineering and Utility Operations

NW Natural

250 SW Taylor St.

Portland, OR 97204

## Instructions and Ratings Definitions

### INSTRUCTIONS

**S - Satisfactory**

**U - Unsatisfactory**

### INSPECTION RESULTS

**Satisfactory Responses**

**7**

**Unsatisfactory Responses**

**Satisfactory List**

**1,2,3,4,6,7,8,**

**Unsatisfactory List**



<b>Area Of Concern</b>	<b>Area of Concern Responses</b>	<b>Area of Concern List</b>
	0	
<b>N/A - Not Applicable (does not apply in this inspection)</b>	<b>Not Applicable Responses</b>	<b>Not Applicable List</b>
	1	5,
<b>N/C - Not Checked/Evaluated (was not inspected during this inspection)</b>	<b>Not Checked / Evaluated Responses</b>	<b>Not Checked / Evaluated List</b>
	0	
<b>Unanswered Questions</b>	<b>Unanswered Questions List</b>	
0		

\*\*If an item is marked Form a- annual review. U, N/Form a- annual review or N/C, **an explanation must be included in this report.**

## Records, Procedures and Reports

### Question #1.

Do records indicate that the operator appropriately addresses discovered mapping errors, including all mapping errors that have resulted in excavation damage?

Statutory Reference	1. Result	1. Notes
WAC 480-93-018	Satisfactory	Reviewed sample Clark County mapping corrections.

### Question #2.

Do records indicate that the operator's mapping corrections are made in a timely manner and in accordance with the operator's written procedures?

Statutory Reference	2. Result	2. Notes
WAC 480-93-018	Satisfactory	Red lines are completed within 6 months, IAW procedures.

### Question #3

Do records indicate that the operator has and follows a quality assurance program for monitoring the locating and marking of facilities? Do records show that the operator conducts regular field audits of the performance of locators/contractors and takes action when necessary?

Reference:	3. Results	3. Notes
Operator Internal Performance Measures; PHMSA State Program Guidelines	Satisfactory	Reviewed a sampling of NWN QA reports for locating for 2021-2023.

### Question #4.

Does operator include performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?

Statutory Reference	Statutory Reference	Reference:	4. Result	Q4. Within Scope of this Inspection:	4. Notes
WAC 480-93-007	WAC 480-93-013	PHMSA State Program Guidelines	Not Applicable	No such event occurred, or condition existed.	Locating services are not incentivized.

### Question #5.

Do operator contracted (or organic) locators address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?

Statutory Reference	Statutory Reference	5. Result	5. Notes
WAC 480-93-007	WAC 480-93-013	Satisfactory	All NWN field staff can receive training if there are performance problems. NWN had approximately 4 from 2021-2023 that needed to be followed up on, all were re-training.

### Question #6.

Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?

**Statutory Reference**

WAC 480-93-007

**Statutory Reference**

WAC 480-93-013

**6. Result**

Satisfactory

**6. Notes**

Reviewed NWN OQ manual revisions log along with FOM OP 137-02 Locating Facilities.

**Question #7.**

Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements?

**Statutory Reference**

WAC 480-93-007

**Statutory Reference**

WAC 480-93-013

**7. Result**

Satisfactory

**7. Notes**

Reviewed multiple OQs for NWN field staff performing locating and excavating.

**Question #8.**

Do records indicate that the operator has and follows a procedure for leaks caused by excavation damage near buildings such that the procedure adequately addresses the possibility of multiple leaks and underground migration of gas into nearby buildings/structures?

**Reference:**

PHMSA State Program Guidelines  
Operator Internal Performance Measures

**8. Result**

Satisfactory

**8. Notes**

NWN Standard Practices SPW 709.

**Reference:**

PHMSA State Program Guidelines  
Operator Internal Performance Measures

▼ **Comments - Records, Procedures & Reports**

**RECORDS 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.

▼ **FIELD INSPECTION OBSERVATIONS**

▼ **Comments - Field Observations**

**FIELD OBSERVATION 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.