# SOME INSPECTION RESULTS

VIOLATIONS/QUESTIONABLE FINDINGS FOR TRANSMISSION AND DISTRIBUTION INSPECTIONS

# CODE REGULATIONS

## Transportation of natural and other gases by pipeline

- Part 191: Annual, incident, safety-related condition reports – 16 Sections.
- Part 192: Minimum Federal Safety Standards – 137 Sections, 4 Appendices, Numerous IBR standards.
- Part 199: Drug and alcohol testing – 36 Sections
  - DOT procedures, Part 40, numerous sections.
- Chapter 25-12: PSC's natural gas safety rules – 34 Rules
- All have subsections.

- Overall, there are many rules to comply with. It is not an easy job but compliance is important to ensure that the pipe is being designed, operated, and maintained safely.

It is our job to ensure that companies are complying with the rules.


Some areas that needed more attention.

# TRANSMISSION INTEGRITY MANAGEMENT

- DOCUMENTATION, DOCUMENTATION, DOCUMENTATION

## How does an operator identify a high consequence area? – 192.905

- Imp. Program does not describe method used to identify HCA.
- Wrong nominal pipe diameter used in the PIR formula, 14 inches and above pipe size is the same as the nominal diameter.
- No documentation to show that public officials were contacted about identified sites.
- No documentation to show that the pipe is periodically evaluated for the presence of new HCAs.

## What is a continual process of evaluation and assessment to maintain a pipeline's integrity? – 192.937

- No interval set and no documentation to show that a periodic evaluation was done.

## What are the elements of an integrity management program? – 192.911

- Inadequate provisions in the communication plan for addressing the safety concerns of PHMSA and the FPSC.

# What are the requirements for using External Corrosion Direct Assessment (ECDA)? – 192.925

- Insufficient number of digs for a first time assessment.
- If no indications or only monitored indications – 2 minimum + 2 post- assessment digs.
- Additional digs for immediate indications.
- Additional digs per region for scheduled indications.
- Direct examination requires excavation and measurements on the exposed pipe.
- No separate region defined for underwater sections of pipe.
- Direct examination not conducted on pipe in casings or under water crossings.
- Inadequate documentation of procedures for indirect inspections over water and pavement.

## What additional preventive and mitigative measures must an operator take? – 192.935

- No documentation of a risk analysis for adding automatic shut-off valves or remote controlled valves.

## What records must an operator keep? – 192.947

- Implementation of the program differs from written plan and no documentation was made to explain why.

## What actions must be taken to address integrity issues? – 192.933

- Line is operating at greater than 20% of maximum pressure experienced on the date of discovery of an immediate repair condition.

# WHAT DO YOU THINK?

Is adequate care being taken in handling the pipe?

# External corrosion control: Protective coating. - 192.461

Pipe was being pulled into the ground.

1. Coating damaged and not repaired.
2. After being notified to repair the coating, repairs were done without preparing the pipe properly.

# A concern. Thin Spot in Coating.

There is less coating protection than what is marked on the pipe.

# COVER - 192.327

Main installed with less than 24 inches of cover.

# Belowground emergency valve

# Regulator pit

# Aboveground regulator station

# ATMOSPHERIC CORROSION CONTROL: MONITORING/GENERAL - 192.481/192.479

1. For the underground pipes: We are unable to inspect for atmospheric corrosion on the pipe surface.

2. For the regulator station: Corroding pipe must be cleaned and coated to provide protection against atmospheric corrosion.

# LINE MARKERS


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# LINE MARKERS FOR MAINS AND TRANSMISSION LINES - 192.707

- No area code or wrong area code.

- Did not include the word “Warning,” “Caution,” or “Danger.” No operator name.

- Marker information obscured.

# PIPE USED FOR REPAIRS

# MANUFACTURED DATE

# INSTALLATION OF PLASTIC PIPE - 192.321

Pipe in back of truck is 5 years old. How long has it been exposed to ultraviolet rays? The rule has a maximum of two years.

# BUTT FUSION

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# PROCEDURAL MANUAL FOR OPERATIONS, MAINTENANCE, AND EMERGENCIES – 192.605

The operator has to follow its written procedures. In this case it adopted the manufacturer's fusion procedures.

The fuser did not execute the procedures properly, resulting in a butt fusion that failed visual examination.

# GAS INTERRUPTION – VALVE SHUT

# INTERRUPTION OF GAS SERVICE - 25-12.044

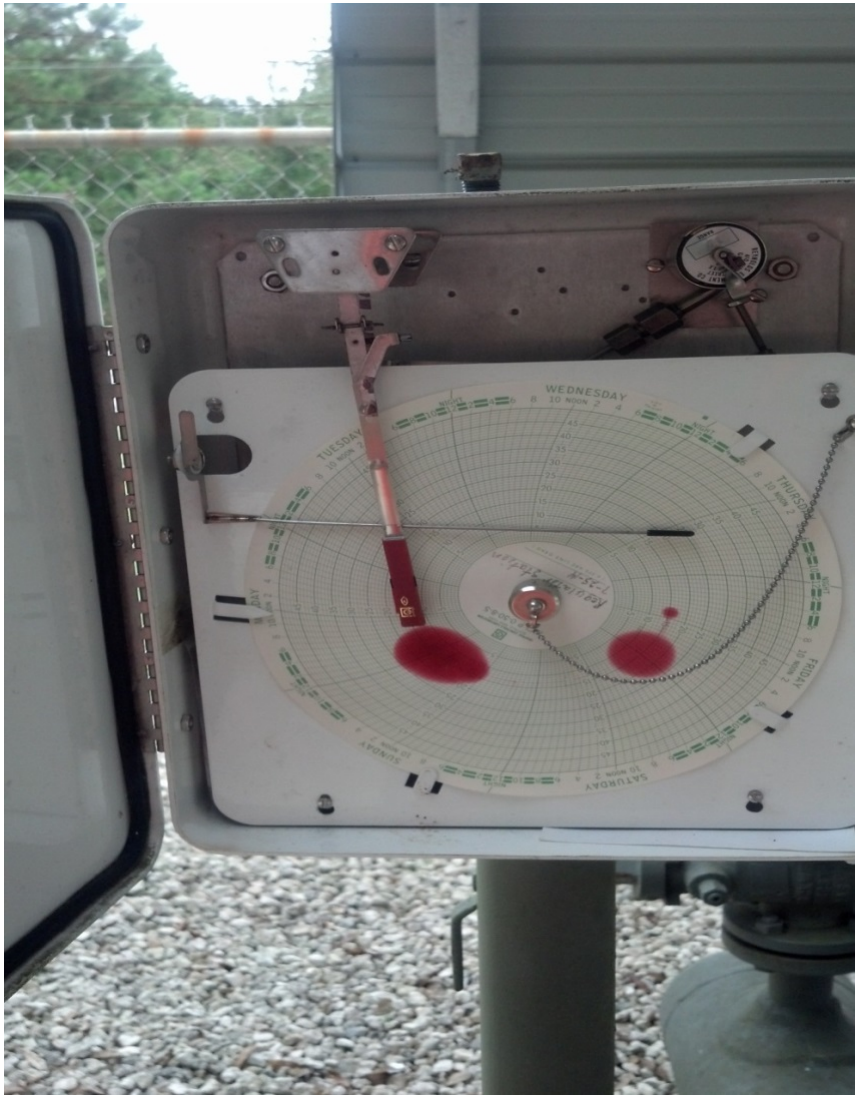
- Meter valve shut but not locked.

# IDENTIFICATION

# FACILITY IDENTIFICATION - 25-12.050

- Faded or missing operator name and phone number.

# PRESSURE RECORDER



# PRESSURE LIMITING AND REGULATING STATIONS: TELEMETERING OR RECORDING GAUGES - 192.741

A distribution system supplied by more than one district pressure regulating station.

Non-recording recorder

# REQUIREMENTS FOR DISTRIBUTION SYSTEM VALVES – 25-12.022 VALVE MARKING

Marked for prompt identification
Durable tag or other equivalent means
Legible marking
Marked on a permanent material
Placed in a visible location
Not marked on the cover only

**QUESTIONS?**