2013 South Dakota Pipeline Safety Inspection

Summary of Deficiencies

Operator: Humboldt Municipal Gas Utilities

Inspection Types: O&M Plan Inspection, Records Inspection, OQ Field Inspection, and Field Inspection (pipeline markers & cathodic protection) Inspection Dates: May 9 and May 21, 2013

Notices of Probable Violation

Code Section	Code Description	Deficiency Noted	Proposed Correction Due Date	Penalty Proposed	Maximum Allowable Penalty	Compliance Order Proposed
192.625(f)	Did the operator use calibrated odorometers?	Odorometer has not been sent in since 8/29/11. Meter needs to be sent in ASAP. This is a repeat offense.	8/24/13	\$2,615 Calculated by NDS on 7-16-13	\$100,000	Humboldt must hire additional help in the area of gas technician and DOT coordinator. Added by NDS on 7-16- 13
§192.707(a)	 Are buried mains and transmission lines marked as required in the following areas: at each crossing of a public road and railroad wherever necessary to identify the location of the line to reduce possibility of damage or interference 	 The following issues were identified regarding pipeline markers: 1. Marker at CP test station #7 needs a new warning sign. 2. Markers need to be installed at 259th St, where new road was put in. 3. Marker at CP test station #21 needs to have the phone number replaced. 4. Maker west of CP test station #21 needs to have phone number replaced. 5. Marker south of the intersection of 258th St and 462nd Ave needs to have phone number replaced. 	8/24/13	\$1,951 Calculated by NDS on 7-16-13	\$100,000	Humboldt must hire additional help in the area of gas technician and DOT coordinator. Added by NDS on 7-16- 13

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		 Marker north of 25889 462nd St needs to have phone number replace. 				
OQ 192.801	 (a) This subpart prescribes the minimum requirements for operator qualification of individuals performing covered tasks on a pipeline facility. (b) For the purpose of this subpart, a covered task is an activity, identified by the operator, that: (1) Is performed on a pipeline facility; (2) Is an operations or maintenance task; (3) Is performed as a requirement of this part; and (4) Affects the operation or integrity of the pipeline. 	PEF192-1414.04 Pipe Shutdown/Startup/Pressure Change: Operating Identified Valve(s) was not completed until 5/23/13. This task should have been identified as a covered task and qualifications completed prior to 1/1/13 when Northwestern Energy discontinued their contract for emergency response.	8/24/13	\$3,239	\$100,000	Humboldt must hire additional help in the area of gas technician and DOT coordinator. Added by NDS on 7-16- 13
§192.225(b).	Has each welding procedure been recorded in detail, including the results of the qualifying tests?	NWE procedures are in the book but they are not authorized to use the NWE standards. They do not have the results of the qualifying test.	8/24/13	\$3,551	\$100,000	Humboldt must hire additional help in the area of gas technician and DOT coordinator. Added by NDS on 7-16- 13
§192.283	Does operator have copies of the destructive tests used to qualify the joining procedures? (yes or no)	Operator has continued to use NWE procedures but does not have the destructive testing documentation for the qualification. Revised joining procedures must be obtained and utilized.	8/24/13	\$3,863	\$100,000	Humboldt must hire additional help in the area of gas technician and DOT coordinator.

						Added by NDS on 7-16- 13
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Warnings

Code Section	Code Description	Deficiency Noted	Warning	Proposed Correction Due Date
§192.459	When the operator has knowledge that any pipeline is exposed, is the exposed pipe examined for:(a) Evidence of corrosion?(b) Coating deterioration?	Bell Hole reports have not been done in the past. No history for any exposed piping.	Humboldt Municipal Gas may be in violation of the code section listed in the first column. The city is advised to correct this or be subject to an enforcement action.	8/24/13
§191.22(a) & §191.22(b)	Has an operator ID been obtained or verified? (OPID)	Missed required date but has been completed. Operator needs to provide documentation.	Humboldt Municipal Gas may be in violation of the code section listed in the first column. The city is advised to correct this or be subject to an enforcement action.	8/24/13
§192.615(b)(2)	 (a) Training appropriate employees as to the requirements of the emergency plan. 	Emergency response training has not been documented.	Humboldt Municipal Gas may be in violation of the code section listed in the first column. The city is advised to correct this or be subject to an enforcement action.	8/24/13
§192.615(b)(3)	Review activities following actual or simulated emergencies to determine if they are effective. Does facility have the review and its outcome documented within their records?	No simulations have been document.	Humboldt Municipal Gas may be in violation of the code section listed in the first column. The city is advised to correct this or be subject to an enforcement action.	8/24/13
§192.225(b).	Has each welding procedure been recorded in detail, including the results of the qualifying tests?	Welding procedures are not available.	Humboldt Municipal Gas may be in violation of the code section listed in the first column. The city is advised to correct this or be subject to an enforcement action.	8/24/13
192.283	Does operator have copies of the destructive tests used to qualify the joining procedures? (yes or no)	Operator has continued to use NWE procedures but does not have the destructive testing documentation for the qualification. Revised joining procedures must be obtained and utilized.	Humboldt Municipal Gas may be in violation of the code section listed in the first column. The city is advised to correct this or be subject to an enforcement action.	8/24/13
OQ Field	Verify the qualified individuals performed the	Missing line marker at road crossings	Humboldt Municipal Gas may be	8/24/13

Warnings				
Code Section	Code Description	Deficiency Noted	Warning	Proposed Correction Due Date
Inspection 9.01 Covered Task Performance	observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures	was not identified.	in violation of the code section listed in the first column. The city is advised to correct this or be subject to an enforcement action.	
OQ Field Inspection 9.02 Qualification Status	Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.	Qualification of operating identified valves should have been completed prior to 1/1/13.	Humboldt Municipal Gas may be in violation of the code section listed in the first column. The city is advised to correct this or be subject to an enforcement action.	8/24/13
OQ Field Inspection 9.03 Abnormal Operating Condition Recognition and Reaction	Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.	Missing line marker at road crossings was not identified.	Humboldt Municipal Gas may be in violation of the code section listed in the first column. The city is advised to correct this or be subject to an enforcement action.	8/24/13

Notices of Concern

Code Section	Code Description	Comment
§192.459	When the operator has knowledge that any pipeline is exposed, is the exposed pipe examined for: (a) Evidence of corrosion? (b) Coating deterioration?	There are no records indicating inspection of exposed piping.
§192.475(a)	Is gas tested to determine corrosive properties?	Need to maintain information from Northern Natural regarding properties of the gas. Information can be accessed by going to NorthernNaturalGas.com and selecting "Gas Quality" under "Informational Posting".
§192.625(b)	Odorization Method –	Operator should get information on odorizer. Currently operator has no information if problems should occur.
§192.723(b)(2)	Does the operator conduct leakage surveys (to include	Maps need to be reviewed to ensure that all areas are included in the survey.

Notices of Concern

Code Section	Code Description	Comment
	manholes/cracks in pavement/other pertinent locations) of	Suggest reviewing all leak surveys to ensure that entire system is covered and
	the distribution system outside of the principal business	planned for future years.
	areas at intervals not exceeding 63 months, but at least	
	once every 5 calendar year?	