

**2013 South Dakota Pipeline Safety Inspection
Summary of Deficiencies**

Operator: Garretson Natural Gas Utilities

Inspection Types: O&M Manual, Records, and Field Inspection (pipeline markers, cathodic reads, valves, and above ground piping)

Inspection Dates: April 17, May 9, & May 23, 2013

Notices of Probable Violation

Code Section	Code Description	Deficiency Noted	Proposed Correction Due Date	Penalty Proposed	Maximum Allowable Penalty	Compliance Order Proposed
192.707 Pipeline Markers	<p>(a) Buried pipelines. Except as provided in paragraph (b) of this section, a line marker must be placed and maintained as close as practical over each buried main and transmission line:</p> <p>(1) At each crossing of a public road and railroad; and</p> <p>(2) Wherever necessary to identify the location of the transmission line or main to reduce the possibility of damage or interference.</p>	<p>The following locations need to have pipeline markers installed:</p> <ol style="list-style-type: none"> 1. 253rd St & 485th Ave on east side of the road. 2. Hwy 115 & Lincoln 3. Washington & Hwy 115 4. Crossing on Hwy 115 to trailer court. 5. Rock Ridge & Lincoln 6. Nordstrom Ave & 5th St <p>Phone number was not updated by 1/1/13 as required in 3 locations. There was also 1 warning signs missing. These corrections have been made.</p>	8/24/13	<p>\$2,615</p> <p>Added by NDS on 7-17-13</p>	\$100,000	<p>Garretson must hire additional help in the area of gas technician and DOT coordinator.</p> <p>Added by NDS on 7-17-13</p>
OQ 192.801	<p>(a) This subpart prescribes the minimum requirements for operator qualification of individuals performing covered tasks on a pipeline facility.</p> <p>(b) For the purpose of this subpart, a covered task is an activity, identified by the operator, that:</p> <p>(1) Is performed on a</p>	<p>PEF192-1414.04 Pipe Shutdown/Startup/Pressure Change: Operating Identified Valve(s) was not completed until 5/23/13.</p> <p>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.</p>	8/24/13	<p>\$2,927</p> <p>Added by NDS on 7-17-13</p>	\$100,000	<p>Garretson must hire additional help in the area of gas technician and DOT coordinator.</p> <p>Added by NDS on 7-17-13</p>

	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.					
§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	\$3,239 Added by NDS on 7-17-13	\$100,000	Garretson must hire additional help in the area of gas technician and DOT coordinator. Added by NDS on 7-17-13
§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	\$3,551 Added by NDS on 7-17-13	\$100,000	Garretson must hire additional help in the area of gas technician and DOT coordinator. Added by NDS on 7-17-13

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?	Operator has not been tracking this in the past. Started documenting information in 2012. No incidents of steel have occurred in the past	Garretson 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	8/24/13

Warnings

Code Section	Code Description	Deficiency Noted	Warning	Proposed Correction Due Date
	(b) Coating deterioration?	year.	enforcement action.	
§191.22(a) & §191.22(b)	Has an operator ID been obtained or verified? (OPID)	Missed required date but has been completed. Completed 12/5/12	Garretson 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.	Garretson 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. Garretson 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?	Simulated exercises are not included in the O&M manual. Changed during inspection. No simulations have been document..	Garretson 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
§192.747 Valve Inspection	(a) Each valve, the use of which may be necessary for the safe operation of a distribution system, must be checked and serviced at intervals not exceeding 15 months, but at least once each calendar year. (b) Each operator must take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternative valve.	Valve list should be reviewed to ensure that all valves required to be emergency valves are designated as emergency valves. The valve at the Garretson TBS was not identified in the valve inspection file as being inspected.	Garretson 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
§192.747 Valve Inspection	(a) Each valve, the use of which may be necessary for the safe operation of a distribution system, must be checked and	Valve at Garretson TBS should be reviewed. When operating the valve, it moved both directions.	Garretson Municipal Gas may be in violation of the code section listed in the first column. The city is advised to correct	8/24/13

Warnings

Code Section	Code Description	Deficiency Noted	Warning	Proposed Correction Due Date
	serviced at intervals not exceeding 15 months, but at least once each calendar year. (b) Each operator must take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternative valve.	Unsure if valve is not fully open or if there is a maintenance issue.	this or be subject to an enforcement action.	
OQ Field Inspection 9.01 Covered Task Performance	Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures	Missing line markers at road crossings were not identified.	Garretson 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 9.02 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.	Garretson 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 markers at road crossings were not identified.	Garretson 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
192.479 Atmospheric Corrosion	(a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this	Block & bleed at 478 Av and 253 St should have tape coating installed at ground to air interface on the west

Notices of Concern

Code Section	Code Description	Comment
	<p>section. (b) Coating material must be suitable for the prevention of atmospheric corrosion. (c) Except portions of pipelines in offshore splash zones or soil-to-air interfaces, the operator need not protect from atmospheric corrosion any pipeline for which the operator demonstrates by test, investigation, or experience appropriate to the environment of the pipeline that corrosion will- (1) Only be a light surface oxide; or (2) Not affect the safe operation of the pipeline before the next scheduled inspection.</p>	<p>end of the piping.</p>
<p>§192.723(b)(2)</p>	<p>Does the operator conduct leakage surveys (to include manholes/cracks in pavement/other pertinent locations) of the distribution system outside of the principal business areas at intervals not exceeding 63 months, but at least once every 5 calendar year?</p>	<p>Maps need to be reviewed to ensure that all areas are included in the survey. Suggest reviewing all leak surveys to ensure that entire system is covered and planned for future years.</p>