

2013 South Dakota Pipeline Safety Inspection

Summary of Deficiencies

Operator: MDU South Dakota Heartland Region

Inspection Types: Standard, TIMP, Field Inspection of Valves, Line Markers and CP Reads, OQ Field Inspection

Inspection Dates: June 25-27, 2013

Notices of Probable Violation

Process of Probable Violation									
Code Section	Code Description	Deficiency Noted				Proposed Correction Due Date	Penalty Proposed	Maximum Allowable Penalty	Compliance Order Proposed
§192.625	Did the operator use calibrated odorometers?	S/N	Year/Date	Calibration Status	Location	12-31-12	\$2,732	\$100,000	None
		200728014	01/20/12	OK	Heartland				
		Grain							
		200728014	12/10/12	OK	Heartland				
		Grain							
	They can't locate unit SN 2651-5	2000820011	12/22/11	OK	Mobridge				
		2000820011	12/19/12	OK	Mobridge				
	What kind of equipment is used?	2000714009	10/10/11	OK	Pierre				
	Heath	2000714009	12/27/12	OK	Pierre				

OQ Field Inspection Protocol 9.02 - Qualification Status	Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.	<p>Per below summary, Dan Stover and Michael Pruitt are not qualified to operate a valve as of inspection date of June 25-27, 2013.</p> <p>Stover and Pruitt qualifications were updated on July 25, 2013.</p> <table><tr><td>Name</td><td>1414.04</td></tr><tr><td></td><td>Operate Identified Valve</td></tr><tr><td>Dan Stover</td><td></td></tr><tr><td>Michael Pruitt</td><td></td></tr><tr><td>Shawn Goehring</td><td>7-16-2016</td></tr><tr><td>Brady Retterath</td><td>5-2-2015</td></tr></table>	Name	1414.04		Operate Identified Valve	Dan Stover		Michael Pruitt		Shawn Goehring	7-16-2016	Brady Retterath	5-2-2015	Immediately	\$3,079	\$100,000	None
Name	1414.04																	
	Operate Identified Valve																	
Dan Stover																		
Michael Pruitt																		
Shawn Goehring	7-16-2016																	
Brady Retterath	5-2-2015																	

Warnings

Code Section	Code Description	Deficiency Noted	Warning	Proposed Correction Due Date
§192.16 (b)	Has the operator notified all customers by August 14, 1996 or new customers within 90 days of their responsibility for those sections of service lines not maintained by the operator? (5) the operator, plumbing contractors, and heating contractors can assist in locating, inspecting, and repairing the customer's buried piping	Not included with information given to new customers. Customer packet needs to have this added. MDU agreed to add to customer packets going forward.	Montana-Dakota Utilities (MDU) may be in violation of the code section in Column A. MDU is advised to correct this or be subject to enforcement action	12-31-13
§192 Appendix D. Part II	Does the operator criteria consider IR drop?	Instant off readings in 2005 for northern part of system bonded to SDIP and receiving impressed current from SDIP. Average IR drop from 2005 is .3 V for the bonded farm taps. There is no data demonstrating that IR drop is negligible for the galvanic portions of the system. MDU must conduct another instant off survey on the bonded farm taps and demonstrate that the IR drop is negligible for the galvanic portions. Since IR drop can change, IR drop determination must be done every 5 years.	Montana-Dakota Utilities (MDU) may be in violation of the code section in Column A. MDU is advised to correct this or be subject to enforcement action	12-31-13
§192.463 (c)	Is the amount of cathodic protection controlled to prevent damage to the protective coating or the pipe?	Bonded to SDIP at Volk farm tap with reading of -1.84 - .3 or -1.54 V instant off so potential for coating damage exists since impressed current from SDIP is on MDU pipe. (Peabody suggests potential exists for coating damage anytime more negative than the general guideline of -1.1 volts.) Operator feels the stray current issue if an insulator is put in would be worse than the potential for coating disbondment. Operator must survey the 20 feet of underground steel pipe at the Volga tap using an industry accepted method to confirm no coating disbondment. If coating disbondment is found, a remediation plan must be proposed based on risk.	Montana-Dakota Utilities (MDU) may be in violation of the code section in Column A. MDU is advised to correct this or be subject to enforcement action	12-31-13

Warnings

Code Section	Code Description	Deficiency Noted	Warning	Proposed Correction Due Date
§192.707(a)	Are buried mains and transmission lines marked as required in the following areas: (1) at each crossing of a public road and railroad	S side Hwy 12, E of Main St Glenham Broken by mower, needs replacing and relocating to fence line.	Montana-Dakota Utilities (MDU) may be in violation of the code section in Column A. MDU is advised to correct this or be subject to enforcement action	12-31-13
TIMP A.03.b.	Identified sites must be identified using the following sources of information: [§192.905(b)] i. Information from routine operation and maintenance activities and input from public officials with safety or emergency response or planning responsibilities ii. In the absence of public official input, the operator must use one of the following in order to identify an identified site: 1. Visible markings such as signs, or 2. Facility licensing or registration data on file with Federal, State, or local government agencies, or 3. Lists or maps maintained by or available from a Federal, State, or local government agency and available to the general public.	Copies of letters to Sheriff's office in Aberdeen and from State Fire Marshall's office for Heartland Grain line identified site determination for both 2011 and 2013 were provided. The letters were unsigned Word copies. <ul style="list-style-type: none"> Operator is not obligated to send these letters out every year as is being done. From the 2009 Inspection, response from Fire Marshall's office indicated they do not have these records. Inspector recommended that operator send letter to Brown County Emergency Management instead and Brown County Planning. Recommendation was not implemented. (See text from 2009 NOC below). (2009-The plan currently states that the Sheriff and State Fire Marshall's office will be contacted. A letter in the MDU file from the Fire Marshall states their office does not have this information. Although the Sheriff information meets the code here, I recommend MDU include county emergency management and county planning to be the contact agencies for this requirement as better sources for this information.) If operator continues to send these letters annually, must redirect the state Fire Marshal's letter to a Brown County source such as Emergency Management or Planning. Recommend that these letters be sent every 3 years rather than annually but there is no timing specified in code.	Montana-Dakota Utilities (MDU) may be in violation of the code section in Column A. MDU is advised to correct this or be subject to enforcement action	12-31-13

Notices of Concern

Code Section	Code Description	Comment
§192.475(a)	Is gas tested to determine corrosive properties?	2013 data indicates gas is tested but no evaluation information was supplied to demonstrate if gas quality was within contract limits. MDU should provide documentation to inspectors demonstrating gas compliance status with corrosive limits in contract.