Kristie Fiegen, Chairperson
Gary Hanson, Vice Chairman
Chris Nelson, Commissioner

South Dakota
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June 17, 2024

The Honorable Bruce Brown
Mayor, City of Garretson
PO Box 370
Garretson, SD 57030
mayor@cityofgarretson.com

RE: South Dakota 2024 Records and Field Inspection of Garretson Municipal Gas

Mayor Brown:

This letter and attachments summarize the findings of the inspection conducted in reference to the Garretson natural gas facilities. I would like thank Jordan Doane for providing the required information.

The findings from the inspections are summarized into the following categories in the attached Summary of Deficiencies form.

1. **Notices of Probable Violation** – are issued if the inspector has good cause to believe a serious or repeat violation of the pipeline safety regulations has occurred. Notices of Probable Violation can also include monetary penalties of up to $200,000 per day of violation (penalty may not exceed $2 million) and may include specific corrective actions that must be taken to correct the situation within a specific time frame and to come into compliance with the pipeline safety regulations.

2. **Warnings** – are issued for less serious violations of the pipeline safety regulations. Warnings may include specific corrective actions that must be taken to correct the situation within a specific time frame and to come into compliance with the pipeline safety regulations.

3. **Notices of Concern** – are issued where no direct violation of the pipeline safety regulations exists and for informational purposes to aid the operator in managing as safe and effective pipeline as possible. Notices of Concern are also used to denote areas where best industry practices are not being followed. No response is required for a Notices of Concern but action by the operator to the pipeline facility is anticipated to occur in the near future.

The completed inspection forms have also been enclosed that will include additional details such as inspection notes and the inspection issue corrections made prior to the issuance of this report.

You must respond to the warnings listed in the Summary of Deficiencies form within 30 business days from the date this letter is received. Please indicate in your response either agreement with each warning and requirement along with the proposed correction date or whether the issue is disputed. Failure to respond is considered agreement.

Please note the inspection conducted at your facility is limited to the specified code sections in the attached inspection checklist. The South Dakota Public Utilities Commission (SDPUC) did not examine overall system condition or operability and does not warrant the same under any condition. Other system or code compliance issues may exist. Failure to include such items in this report does not prohibit future SDPUC action nor limit applicability in future inspections.

If you have questions about the inspection or would like to discuss the inspection findings, please feel free to contact me.

Sincerely,

Mary Zanter

Mary Zanter
Pipeline Safety Program Manager

CC: Jordan Doane, Garretson Municipal Gas, utilities@cityofgarretson.com
Boice Hillmer, SDPUC, boice.hillmer@state.sd.us

Attachments

2024 South Dakota Pipeline Safety Inspection
Summary of Deficiencies
Operator: Garretson
Inspection Type: Records and Field Inspection
Inspection Dates: 6/10/2024

Notices of Probable Violation

Code Section	Code Description	Deficiency Noted	Proposed Correction Due Date	Penalty Proposed	Maximum Allowable Penalty	Compliance Order Proposed
		None				

Warnings

Code Section	Code Description	Deficiency Noted	Warning	Proposed Correction Due Date
§192.743	(a) Pressure relief devices at pressure limiting stations and pressure regulating stations must have sufficient capacity to protect the facilities to which they are connected. Except as provided in §192.739(b), the capacity must be consistent with the pressure limits of §192.201(a). This capacity must be determined at intervals not exceeding 15 months, but at least once each calendar year, by testing the devices in place or by review and calculations. (b) If review and calculations are used to determine if a device has sufficient capacity, the calculated	Relief capacity calculation has not been done for all regulator stations. If testing is done in the field, it must be documented.	Operator may be in violation of the code section in Column A. Operator is advised to correct this or be subject to enforcement action.	10/15/2024

Warnings

Code Section	Code Description	Deficiency Noted	Warning	Proposed Correction Due Date
	capacity must be compared with the rated or experimentally determined relieving capacity of the device for the conditions under which it operates. After the initial calculations, subsequent calculations need not be made if the annual review documents that parameters have not changed to cause the rated or experimentally determined relieving capacity to be insufficient. (c) If a relief device is of insufficient capacity, a new or additional device must be installed to provide the capacity required by paragraph (a) of this section.			
§192.605(b)(3)	(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations. ……. (3) Making construction records, maps, and operating history	Maps need to be updated to show current information.	Operator may be in violation of the code section in Column A. Operator is advised to correct this or be subject to enforcement action.	6/15/2025

Warnings

Code Section	Code Description	Deficiency Noted	Warning	Proposed Correction Due Date
	available to appropriate operating personnel. ……..			

Notices of Concern

Code Section	Code Description	Comment
§191.11	(a) General. Except as provided in paragraph (b) of this section, each operator of a distribution pipeline system must submit an annual report for that system on DOT Form PHMSA F 7100.1-1. This report must be submitted each year, not later than March 15, for the preceding calendar year.	Need to correct annual report on number of services installed in 2023.
§192.479	(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 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	Pipe to soil interface on farm taps needs to have new wrap installed. Each farm tap/station should be reviewed, and tape should be applied as necessary.

Notices of Concern

Code Section	Code Description	Comment
	before the next scheduled inspection.	
§192.707	(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: (1) At each crossing of a public road and railroad; and (2) Wherever necessary to identify the location of the transmission line or main to reduce the possibility of damage or interference. (b) Exceptions for buried pipelines. Line markers are not required for the following pipelines: (1) Mains and transmission lines located offshore, or at crossings of or under waterways and other bodies of water. (2) Mains in Class 3 or Class 4 locations where a damage prevention program is in effect under §192.614. (3) Transmission lines in Class 3 or 4 locations until March 20, 1996. (4) Transmission lines in Class 3 or 4 locations where placement of a line marker is impractical. (c) Pipelines above ground. Line markers must be placed and maintained along each section of a main and transmission line that is located above ground in an area accessible to the public. (d) Marker warning. The following must be written legibly on a background of sharply contrasting color on each line marker:	Sticker on marker post should be replace on west side of 480th Ave

Notices of Concern

Code Section	Code Description	Comment
	(1) The word "Warning," "Caution," or "Danger" followed by the words "Gas (or name of gas transported) Pipeline" all of which, except for markers in heavily developed urban areas, must be in letters at least 1 inch (25 millimeters) high with ¼ inch (6.4 millimeters) stroke. (2) The name of the operator and telephone number (including area code) where the operator can be reached at all times.	

CUSTOMER METER/SERVICE REGULATOR INSPECTION CHECKLIST

For Gas Pipeline Facilities

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

I. GENERAL INFORMATION

Operator Evaluated	Garretson Municipal Gas		
Operator ID	31094		
Contact Person / Title (person interviewed)	Jordan Doane	**Email**	Jordon.doane@cityofgarretson.com
Responsible Party/Title	Bruce Brown, Mayor	**Email**	mayor@cityofgarretson.com
Mailing Address	PO Box 370, Garretson, SD 57030-0370		
Inspection Date	6/10/2024	**Last Inspection Date**	5/18/2022
Location of Inspection	Garretson		
Inspector Name	Mary Zanter & Boice Hillmer		

§192.353 Customer meters and regulators: Location.
(a) Each meter and service regulator, whether inside or outside a building, must be installed in a readily accessible location and be protected from corrosion and other damage, including, if installed outside a building, vehicular damage that may be anticipated. However, the upstream regulator in a series may be buried.
(b) Each service regulator installed within a building must be located as near as practical to the point of service line entrance.
(c) Each meter installed within a building must be located in a ventilated place and not less than 3 feet (914 millimeters) from any source of ignition or any source of heat which might damage the meter.
(d) Where feasible, the upstream regulator in a series must be located outside the building, unless it is located in a separate metering or regulating building.

§192.355 Customer meters and regulators: Protection from damage.
(a) Protection from vacuum or back pressure. If the customer's equipment might create either a vacuum or a back pressure, a device must be installed to protect the system.
(b) Service regulator vents and relief vents. Service regulator vents and relief vents must terminate outdoors, and the outdoor terminal must:
- (1) Be rain and insect resistant;
- (2) Be located at a place where gas from the vent can escape freely into the atmosphere and away from any opening into the building; and,
- (3) Be protected from damage caused by submergence in areas where flooding may occur.

(c) Pits and vaults. Each pit or vault that houses a customer meter or regulator at a place where vehicular traffic is anticipated, must be able to support that traffic.

§192.357 Customer meters and regulators: Installation.
(a) Each meter and each regulator must be installed so as to minimize anticipated stresses upon the connecting piping and the meter.
(b) When close all-thread nipples are used, the wall thickness remaining after the threads are cut must meet the minimum wall thickness requirements of this part.
(c) Connections made of lead or other easily damaged material may not be used in the installation of meters or regulators.
(d) Each regulator that might release gas in its operation must be vented to the outside atmosphere.

§192.365 Service lines: Location of valves.
(a) Relation to regulator or meter. Each service-line valve must be installed upstream of the regulator or, if there is no regulator, upstream of the meter.
(b) Outside valves. Each service line must have a shutoff valve in a readily accessible location that, if feasible, is outside of the building.
(c) Underground valves. Each underground service-line valve must be located in a covered durable curb box or standpipe that allows ready operation of the valve and is supported independently of the service lines.

§192.479 Atmospheric corrosion control; General.
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 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.

II. Customer Meters and Regulators

Location (city or street)		Farm tap by horse ranch	Farm tap by 48232 253rd St	Farm tap at 482nd Ave and 253rd	Farm tap on 253rd St east of 480th Ave	Farm tap at 47670 254th St	Farm tap at CP Station 8	
Readily accessible and protected from corrosion and other damage	192.353 a	Ok	Ok	Ok	Ok	Ok	Ok	
Vents terminate outdoors and are:	192.355 b							
Rain and insect resistant	192.355 b 1	Ok	Ok	Ok	Ok	Ok	Ok	
Away from building opening	192.355 b 2	Ok	Ok	Ok	Ok	Ok	Ok	
Protected from submergence	192.355 b 3	Ok	Ok	Ok	Ok	Ok	Ok	
Installed to minimize piping stress	192.357 a	Ok	Ok	Ok	Ok	Ok	Ok	
Regulator vented outside	192.357 d	Ok	Ok	Ok	Ok	Ok	Ok	
Atmospheric corrosion present	192.479	Ok	Ok	Ok	Ok	Ok	Ok	
Rigid support piping	192.357 a	Ok	Ok	Ok	Ok	Ok	Ok	
Vent screen open	192.355 a 2	Ok	Ok	Ok	Ok	Ok	Ok	
Sufficient capacity of vent piping if extended	192.355 a 2	Ok	Ok	Ok	Ok	Ok	Ok	
Surface rust present	192.479	Wrap	Wrap	Wrap	Wrap	Wrap	Wrap	

Comments: Check each farm tap and station to ensure you have good coating at the soil to air interface.

PIPELINE SAFETY RECORDS INSPECTION CHECKLIST

2024

South Dakota Public Utilities Commission

I. GENERAL INFORMATION	
Operator Evaluated	Garretson Municipal Gas
Operator ID	31094
Unit Description	About 6 miles of 720 MAOP steel line and a plastic distribution system feeding the town of Garretson.
Portions of Unit Inspected	**Records:** New Services Excess Flow Valves & Curb Valves Replacement Services NA Repaired Services NA New Main NA Replacement Main NA Repaired Main NA Uprate Information NA Welding Qualification NA Steel Projects – review of welder qualification NA Fusion Procedures Fusion Qualification MAOP Documentation Regulator Station Inspections Regulator Station Calculations Telemetering and Chart Recorder NA
Prior to Inspection Review These Documents	Telephonic Reports to NRC NA Written Incident Reports NA Annual Reports Safety Related Conditions Reports NA

Contact Person / Title (person interviewed)	Jordan Doane	**Email**	Jordon.doane@cityofgarretson.com
Responsible Party/Title	Bruce Brown, Mayor	**Email**	mayor@cityofgarretson.com
Mailing Address	PO Box 370, Garretson, SD 57030-0370		
Inspection Date	6/10/2024	**Last Inspection Date**	5/18/2022
Location of Inspection	Garretson		
Inspector Name	Mary Zanter & Boice Hillmer		

II. PART 191 – REPORTING REQUIREMENTS		S	N/I	U	N/A
§191.5	(a) At the earliest practicable moment following discovery, but no later than one hour after confirmed discovery, each operator must give notice in accordance with paragraph (b) of this section of each incident as defined in § 191.3. (b) Each notice required by paragraph (a) of this section must be made to the National Response Center either by telephone to 800-424-8802 (in Washington, DC, 202 267-2675) or electronically at http://www.nrc.uscg.mil and must include the following information: (1) Names of operator and person making report and their telephone numbers. (2) The location of the incident. (3) The time of the incident. (4) The number of fatalities and personal injuries, if any. (5) All other significant facts that are known by the operator that are relevant to the cause of the incident or extent of the damages. (c) Within 48 hours after the confirmed discovery of an incident, to the extent practicable, an operator must revise or confirm its initial telephonic notice required in paragraph (b) of this section with an estimate of the amount of product released, an estimate of the number of fatalities and injuries, and all other significant facts that are known by the operator that are relevant to the cause of the incident or extent of the damages. If there are no changes or revisions to the initial report, the operator must confirm the estimates in its initial report. Have any incident(s) occurred within the last **2 calendar years** (yes or no)?				x
	Were incident(s) telephonically reported to **NRC**? **(1-800-424-8802)**				x
	Was all required information reported to NRC?				x
§191.9 and §191.15	Are incidents reported by telephone followed up with a **30-day** written report? **(RSPA Form 7100.1) – Distribution** or **(RSPA Form 7100.2) – Transmission and Gathering**				x
	Was additional relevant information submitted as a supplementary report (if necessary)?				x
§191.11; §191.17; and ARSD 20:10:37:10	Are annual reports submitted to Washington and the SDPUC? **(RSPA Form 7100.1-1) – Distribution Systems** or **(RSPA Form 7100.2-1) – Transmission and Gathering Systems** **Need to correct annual report on number of services installed in 2023.**	x			
§191.22(c)	Have changes been electronically submitted for the following?				
	Notify PHMSA of any of the following events not later than 60 days before the event occurs:				x

II. PART 191 – REPORTING REQUIREMENTS		S	N/I	U	N/A
	A. Construction or any planned rehabilitation, replacement, modification, upgrade, uprate, or update of a facility, other than a section of line pipe, that costs $10 million or more. B. Construction of 10 or more miles of a new or replacement pipeline; or C. Construction of a new LNG plant or LNG facility.				
	Notify PHMSA of any of the following events not later than 60 days after the event occurs: A. A change in the primary entity responsible (i.e., with an assigned OPID) for managing or administering a safety program required by this part covering pipeline facilities operated under multiple OPIDs. B. A change in the name of the operator; C. A change in the entity (e.g., company, municipality) responsible for an existing pipeline, pipeline segment, pipeline facility, or LNG facility; D. The acquisition or divestiture of 50 or more miles of a pipeline or pipeline system subject to Part 192 of this subchapter; or E. The acquisition or divestiture of an existing LNG plant or LNG facility subject to Part 193 of this subchapter.				**x**
§191.23	(a) Did any of the following safety related conditions occur within the last **2 calendar years**:				
	General **corrosion** that reduced wall thickness to less than required for the MAOP or localized corrosion pitting where leaks may occur (for pipelines operating at 20% or more of SMYS, i.e. transmission lines)				**x**
	Unintended movement or abnormal loading by environmental causes that impairs the serviceability of the pipeline				**x**
	Any crack or other material defect that impairs the structural integrity of a LNG facility that contains controls or process gas or LNG				**x**
	Any **material defect or physical damage** that impairs the serviceability of pipelines that operate at 20% or more of SMYS (transmission lines)				**x**
	Any **malfunction or operating error** that causes the MAOP to be exceeded (plus the allowed build up for pressure limiting devices)				**x**
	A **leak** in a pipeline that constitutes an emergency				**x**
	Inner tank leakage, ineffective insulation, or frost heave that impairs the structural integrity of a LNG storage tank				**x**
	Any **safety-related condition** that could lead to an imminent hazard and causes a reduction in operating pressure (by 20% or more) or shutdown of a pipeline				**x**
	NOTE: reports are not required for: 1) master meter systems or customer-owned service lines; 2) incidents or conditions that result in an incident before the deadline for filing the report; 3) pipelines that are more than 220 yards from occupied buildings or outdoor places of assembly (except they are required in railroad and road ROWs); and 4) if the condition is corrected by repair or replacement before the deadline for filing the report (except they are required for general corrosion conditions)				

II. PART 191 – REPORTING REQUIREMENTS		S	N/I	U	N/A
§191.23(b)	(a) Was a report filed within five (**5**) working days of determination and within ten (**10**) working days of discovery for each safety-related condition?				x
§191.25	(a) Was a report filed within five (**5**) working days of determination and within ten (**10**) working days of discovery for each safety-related condition?				x
	Was all required information included in the "Safety-Related Condition Report" (refer to 191.25(b))?				x
	Have you made any changes to your transmission system? Has notification been submitted to NPMS? (required annually)				x
§192.605(c)(1)	**For Transmission Only Operators:** Review the records if the following occurred: 1. Unintended closure of valves or shutdowns. 2. Increase or decrease in pressure or flow rate outside normal operating limits. 3. Loss of communications. 4. Operation of any safety device. **5.** Any other foreseeable malfunction of a component, deviation from normal operation or personnel error which may result in a hazard to pers or property.				x

III. PART 192 – MISCELLANEOUS		S	N/I	U	N/A
§192.14	(a) A steel pipeline previously used in service not subject to this part qualifies for use under this part if the operator prepares and follows a written procedure to carry out the following requirements: (1) The design, construction, operation, and maintenance history of the pipeline must be reviewed and, where sufficient historical records are not available, appropriate tests must be performed to determine if the pipeline is in a satisfactory condition for safe operation. (2) The pipeline right-of-way, all aboveground segments of the pipeline, and appropriately selected underground segments must be visually inspected for physical defects and operating conditions which reasonably could be expected to impair the strength or tightness of the pipeline. (3) All known unsafe defects and conditions must be corrected in accordance with this part. (4) The pipeline must be tested in accordance with Subpart J of this part to substantiate the maximum allowable operating pressure permitted by Subpart L of this part. (b) Each operator must keep for the life of the pipeline a record of investigations, tests, repairs, replacements, and alterations made under the requirements of paragraph (a) of this section. (c) An operator converting a pipeline from service not previously covered by this part must notify PHMSA 60 days before the conversion occurs as required by § 191.22 of this chapter.				x

III. PART 192 – MISCELLANEOUS		S	N/I	U	N/A
192.710	Transmission lines that operate at greater than 30% SMYS: Are there areas located in Class 3 or Class 4 locations or moderate consequence areas? Has an assessment been done? revised with Mega Rule implementation 7/1/2020 (Or in TIMP Plan) (see code)				x
§192.711	Have repairs been made? Temporary or permanent? If temporary, for how long? (See code for specifics.)				x
§192.712					x

IV. PART 192 – EXCESS FLOW VALVES & MANUAL SERVICE LINE VALVES		S	N/I	U	N/A
§192.383(b) & (c)	Has the operator installed § 192.381 compliant EFV's on **all** new or replaced service lines with a known load of less than 1000 SCFH per service. *(Effective 4/14/17)* Exceptions: (1) The service line does not operate at a pressure of 10 psig or greater throughout the year; (2) The operator has prior experience with contaminants in the gas stream that could interfere with the EFV's operation or cause loss of service to a residence; (3) An EFV could interfere with necessary operation or maintenance activities, such as blowing liquids from the line; or (4) An EFV meeting performance standards in § 192.381 is not commercially available to the operator.				x
§192.383 (d)	Have any customer requested EFVs been installed? *(Effective 4/14/17)*				x
§192.383(e) & (f)	Have customers been notified of the option to have an EFV installed? *(Effective 4/14/17)*				x
§192.383(g)	Does the annual report contain the number of EFV's installed?				x
§192.385 (b)	Are manual service line shut-off valves installed on all new services installed with a meter capacity of 1000 SCFH or greater? *(Effective 4/14/17)*				x
§192.385 (c)	Are manual service line shut-off valves maintained regularly and the maintenance documented?				x

V. PART 192 – TEST REQUIREMENT RECORDS FOR PIPELINES		S	N/I	U	N/A
	Does the operator use calibrated gauges for pressure tests? Currently doing checks for accuracy but haven't done it in the past.	x			
	Review records for mains and services installed during the last two years.				
§192.503	Have any new segments of pipeline been installed or segments of relocated or replaced pipeline been returned to service? (yes or no) Was it test according to the requirement of this section?				x
§192.503(d)	Is each non-welded joint used to tie in a test segment leak tested at not less than its operating pressure? (yes or no)				x

V. PART 192 – TEST REQUIREMENT RECORDS FOR PIPELINES		S	N/I	U	N/A
§192.503(e)	If a component other than pipe is being replaced or added, a strength test is not required if the manufacturer certifies that: 1) component was tested to a least the pressure required for the pipeline to which it is being added. 2) component was manufactured under quality control system that ensures the component is at least equal in strength to a prototype that was tested. 3) component carries a pressure rating established though applicable ASME/ANSI.				**x**
192.505(a)	**Strength test requirements for steel pipeline to operate at a hoop stress of 30 percent or more of SMYS.** Except for service lines, each segment of a steel pipeline that is to operate at a hoop stress of 30 percent or more of SMYS must be strength tested in accordance with this section to substantiate the proposed maximum allowable operating pressure. *Note: in class 1 or 2 locations if there is a building intended for human occupancy within 300 ft, a hydrostatic test must be conducted to a test pressure of at least 125% of MOP. If the buildings are evacuated while hoop stress exceeds 50% of SMYS then air or gas may be used as a test medium.*				
§192.505(b)	Have any compressor, regulator, or measuring stations been newly installed or replaced in Class 1 and Class 2 locations? (yes or no) If yes, were they tested to at least Class 3 location requirements?				**x**
§192.505(c)	Is the pressure at or above test pressure for at least eight hours? (yes or no)				**x**
§192.505(d)	Were any fabricated or short sections of pipe installed? (yes or no) If yes were these sections pressure tested for at least four hours before they are installed, if it is impractical to pressure test after installation? (yes or no)				**x**
§192.506	Transmission line operating at 30% or greater SMYS: Are spike hydrostatic pressure test conducted according to 192.506?				x
§192.507(b)(1) §192.507(b)(2)	**Pipelines Operating at less than 30 percent of SMYS and at or above 100 psig.** Does the operator use a test procedure that will ensure discovery of all potentially hazardous leaks in the segment being tested? If the segment is stressed to 20 percent or more of SMYS and is using natural gas, inert gas, or air is one of the following used: - A leak test at a pressure between 100 psig and the pressure required to produce a hoop stress of 20 percent of SMYS; or - The line is walked to check for leaks while the hoop stress is held at approximately 20 percent of SMYS List or highlight the one used.				x
§192.507(c)	Is the pressure maintained at or above the test pressure for at least one hour? (yes or no)				**x**
§192.507(d)	For fabricated units and short sections of pipe, for which a post installation test is impractical, a preinstallation pressure test must be conducted in accordance with the requirements of this section.				**x**

V. PART 192 – TEST REQUIREMENT RECORDS FOR PIPELINES		S	N/I	U	N/A
§192.517	All transmission pressure test records (Records for 192.505, 192.506 & 192.507) must be kept for the life of the system and include the following: Operators name and name of employee responsible Test medium used Test pressure Test duration Pressure recording charts or other records for recording readings Elevation variations, whenever significant for the particular test Leaks and failures noted and their disposition revised with Mega Rule implementation 7/1/2020				x
§192.509, §192.511, §192.513 and §192.517	**For distribution mains and services**				
	Are pressure test records maintained that contain the following information (these records must be maintained for at least 5 years):				
	- Date	x			
	-Operator name & name of operator employee responsible for making the test.	x			
	- Location of test	x			
	- Test pressure applied	x			
	- Test medium used.	x			
	- Test duration	x			
§192.509(b)	**Test Requirements for pipelines to operate below 100 psig** Is each steel main that is to be operated at less than 1 psig tested to at least 10 psig?	x			
§192.509(b)	Is each steel main that is to be operated at or above 1 psig tested to at least 90 psig?	x			
§192.511(a)	**Service Lines** If feasible, is the connection to the main included in the test?	x			
§192.511(b)	Are service lines expected to operate at a pressure of at least 1 psig but not more than 40 psig tested at a pressure of not less than 50 psig?	x			
§192.511(c)	Are service lines expected to operate at a pressure of more than 40 psig tested at a pressure of not less than 90 psig?	x			
§192.511(c)	Are steel service lines stressed to 20% or more of SMYS tested in accordance with §192.507?				x
§192.513	**Test Requirements for plastic pipelines.** (a) Is each segment of a plastic pipeline tested in accordance with this section? (yes or no) (b) The test pressure must insure discovery of all potentially hazardous leaks in the segment being tested.	x			
§192.513(c)	Does the operator test to at least **150%** of the maximum operating pressure or **50 psig** whichever is greater? (yes or no and list out which one is greater for each operator) c) (c) The test *pressure* must be at least 150% of the maximum operating pressure or 50 psi (345 kPa) gauge, whichever is greater. However, the maximum test pressure may not be more than 2.5 times the pressure determined under § 192.121 at a *temperature* not less than the pipe temperature during the test.)	x			
§192.513(d)	During the test, is the temperature of the pipe not more than 100ºF, or the temperature at which the long term hydrostatic strength has been determined, whichever is greater? (yes or no and list out which one is greater for each operator)	x			

V. PART 192 – TEST REQUIREMENT RECORDS FOR PIPELINES		S	N/I	U	N/A
§192.515	**Environmental protection and safety requirements** Whenever the hoop stress of the segment will be tested in excess of 50% SMYS the operator must take safety precautions to protect people and the test medium must be disposed of in an appropriate manner.				x
§192.67	Steel Transmission Only: Does the operator have records, kept for the for the life of the pipeline, that document the physical characteristics of the pipeline (diameter, yield strength, ultimate tensile strength, wall thickness, seem type, and chemical composition of materials), tests, inspections, and attributes. revised with Mega Rule implementation 7/1/2020				x
§192.127	Steel Transmission Only: Does the operator have records of pipe design. revised with Mega Rule implementation 7/1/2020				x
§192.150	Are all new transmission lines are capable of being pigged? revised with Mega Rule implementation 7/1/2020				x
§192.205	Steel Transmission Lines: Does the operator retain documentation for all components installed in the pipeline? revised with Mega Rule implementation 7/1/2020				x

XVIII. PART 192 – UPRATING		S	N/I	U	N/A
§192.553	Has the operator done an uprate in the last 2 years?				x
	Does the operator have a procedure for uprating? Does it include the following:				
§192.553(a)	(a) Pressure increases. Is the increase in operating pressure made in increments? Is the pressure increased gradually, at a rate that can be controlled?				x
§192.553(a)(1)	At the end of each incremental increase, is the pressure held constant while the entire segment of the pipeline is checked for leaks?				x
§192.553(a)(2)	Is each leak detected repaired before a further pressure increase is made? (except that a leak determined not to be potentially hazardous need not be repaired, if it is monitored during the pressure increase and it does not become potentially hazardous)				x
§192.553(b)	Do uprate records identify work performed and each pressure test conducted?				x
	Are these records retained for the life of the segment?				x
§192.553(c)	Is a written procedure established that will ensure that each part of the uprating meets requirements?				x
§192.553(d)	Are limitations on increases in MAOP followed? (Except as provided in §192.555 (c), a new maximum allowable operating pressure established under this subpart may not exceed the maximum that would be allowed under §§ 192.619 and 192.621 for a new segment of pipeline constructed of the same materials in the same location. However, when uprating a steel pipeline, if any variable necessary to determine the design pressure under the design formula (§192.105) is unknown, the MAOP may be increased as provided in §192.619(a)(1).)				x

XVIII. PART 192 – UPRATING		S	N/I	U	N/A
§192.555	**Uprating to a pressure that will produce a hoop stress of 30 percent or more of SMYS in steel pipelines.** (see code)				x
§192.557(a)	**Uprating to a pressure that will produce a hoop stress less than 30% of SMYS: plastic, cast iron and ductile iron pipelines.** Unless the requirements of this section have been met, no person may subject:				
	(1) A segment of steel pipeline to an operating pressure that will produce a hoop stress less than 30 percent of SMYS and that is above the previously established maximum allowable operating pressure; or				x
	(2) A plastic, cast iron, or ductile iron pipeline segment to an operating pressure that is above the previously established maximum allowable operating pressure.				x
§192.557(b)	Before increasing operating pressure above the previously established maximum allowable operating pressure, the operator shall:				
	(1) Review the design, operating, and maintenance history of the segment of pipeline;				x
	(2) Make a leakage survey (if it has been more than 1 year since the last survey) and repair any leaks that are found, except that a leak determined not to be potentially hazardous need not be repaired, if it is monitored during the pressure increase and it does not become potentially hazardous;				x
	(3) Make any repairs, replacements, or alterations in the segment of pipeline that are necessary for safe operation at the increased pressure;				x
	(4) Reinforce or anchor offsets, bends and dead ends in pipe joined by compression couplings or bell spigot joints to prevent failure of the pipe joint, if the offset, bend, or dead end is exposed in an excavation;				x
	(5) Isolate the segment of pipeline in which the pressure is to be increased from any adjacent segment that will continue to be operated at a lower pressure; and,				x
	(6) If the pressure in main or service lines, or both, is to be higher than the pressure delivered to the customer, install a service regulator on each service line and test each regulator to determine that it is functioning. Pressure may be increased as necessary to test each regulator, after a regulator has been installed on each pipeline subject to the increased pressure.				x
§192.557(c)	After complying with paragraph (b) of this section, the increase in maximum allowable operating pressure must be made in increments that are equal to 10 p.s.i. (69 kPa) gage or 25 percent of the total pressure increase, whichever produces the fewer number of increments. Whenever the requirements of paragraph (b)(6) of this section apply, there must be at least two approximately equal incremental increases.				x
§192.557(d)	If records for cast iron or ductile iron pipeline facilities see §192.557(d).				x

VI. PART 192 – FIELD REPAIR RECORDS: TRANSMISSION LINES		S	N/I	U	N/A
192.709(a)	Are field repair records (for the pipe) maintained that contain the following information (these records must be maintained for the life of the pipeline):				
	- Date				x

VI. PART 192 – FIELD REPAIR RECORDS: TRANSMISSION LINES		S	N/I	U	N/A
	- Location of repair				x
	- Description of each repair made (including pipe-to-pipe connections)				x
192.709(b)	Are field repair records (for parts of the system other than the pipe) maintained that contain the following information (these records must be maintained for at least 5 years):				
	- Date				x
	- Location of repair				x
	- Description of each repair made				x
192.709(c)	*Note: Repairs generated by patrols, surveys, inspections, or tests required by subparts L and M of this part must be retained for at least 5 years or until the next patrol, survey, inspection, or test is completed (whichever is longer).*				
	Testing of repairs				
§192.719(a)	Were any segments of pipe replaced within the system? (yes or no) If yes, was the replacement pipe tested to the requirement of a new line installed in the same location and records maintained as required under Subpart J Testing Requirements? *(Note: the pipe may be tested before it is installed)*				x
§192.205	Steel Transmission Lines: Does the operator retain documentation for all components installed in the pipeline? revised with Mega Rule implementation 7/1/2020				x

VII. PART 192 – TEST REQUIREMENTS FOR REINSTATING SERVICE LINES		S	N/I	U	N/A
	Were any service lines reinstated?				x
§192.725(a)	Does the operator test reinstated service lines in the same manner as new lines and maintain records as required by Subpart J?				x
§192.725(b)	Is each service line that is temporarily disconnected tested from the point of disconnection and records maintained as required by Subpart J?				x

VII. PART 192 – WELDING RECORDS		S	N/I	U	N/A
	Review welding records from past two years.				
	General				
§192.225(a)	Is welding performed by a qualified welder in accordance with API 1104, section IX of the ASME Boiler and Pressure Vessel Code, or Appendix C of Part 192? (yes or no) If yes, highlight or specify which method is used.				x
API 1104	If using API 1104, does operator maintain records of qualified welders that contains the following information (*it is recommended they use Figure 2 from API 1104*):				x
	- Date of welding				x
	- Location				x
	- Name of welder				x
	- Weld position				x
	- Welding time				x
	- Weather conditions				x
	- Voltage				x
	- Amperage				x
	- Welding machine type				x
	- Welding machine size				x

VII. PART 192 – WELDING RECORDS		S	N/I	U	N/A
	- Filler metal				x
	- Reinforcement size				x
	- Pipe type and grade				x
	- Wall thickness				x
	- Outside diameter				x
	- Tensile strength information (and any remarks on tensile strength test)				x
	- Bend test information (and any remarks on bend test)				x
	- Nick-break test information (and any remarks on nick-break test)				x
	- Date tested				x
	- Location of test				x
	- Name of tester				x
	- Results of qualification test (whether they are qualified or disqualified)				x
§192.225(b).	Has each welding procedure been recorded in detail, including the results of the qualifying tests?				x
	If using API 1104, does the record include the items in Appendix A of this form?				x
	If using ASME Boiler and Pressure Vessel code, does the record include the items in Appendix B of this form?				x
	Did the procedures pass all the tests?				x
	Does the data on the record conform to the requirements of the welding standard used (1104 or Boiler and Pressure Vessel)?				x
§192.227	For transmission lines: are weld records retained for 5 years following construction?				x
§192.229(b)	Does operator maintain records for each qualified welder that show the welder has engaged in a specific welding process within the last 6 months or had a weld tested within that preceding 7.5 months?				x
192.229(c)	(1) For pipelines operating at a pressure that produces a hoop stress of 20% or more of SMYS, does the operator have records that show within the preceding 6 months the welder has had one weld tested and found acceptable under section 6 or 9 of API Standard 1104, *Exception: A welder qualified under an earlier addition may weld but not requalify under that earlier addition.* Alternatively, do welders maintain an ongoing qualification status by performing welds tested and found acceptable under section 6 or 9 of API 1104 at least twice each calendar year, but at intervals not exceeding 7-1/2 months?				x
	(2) May not weld on pipe to be operated at a pressure less than 20 percent of SMYS unless the welder is tested in accordance with §192.229(c)(1) or requalifies under §192.229(d)(1) or (d)(2).				x
192.229(d)	For welders that qualify under 192.227(b), does operator maintain records for each qualified welder that show the welder has been requalified within preceding 15 calendar months or within the preceding 7 ½ calendar months (at least twice a year) had one of the following : - a production weld cut out, tested, and found acceptable with the qualifying test; or - for welders that work only on service lines 2 inches or smaller, two sample welds tested and found acceptable in accordance with section III of Appendix C				x
§192.243(a)	Nondestructive testing of welds must be performed by any process, other than trepanning, that clearly indicates defects that may affect the integrity of the weld				x

VII. PART 192 – WELDING RECORDS		S	N/I	U	N/A
§192.243(b)	Nondestructive testing of welds must be performed: (1) In accordance with a written procedure, and (2) By persons trained and qualified in the established procedures and with the test equipment used.				x
§192.243(c)	Procedures established for proper interpretation of each nondestructive test of a weld to ensure acceptability of the weld under §**192.241(c).**				x
§192.243(d)	When nondestructive testing is required under §192.241(b), are the following percentages of each day's field butt welds, selected at random by the operator, nondestructively tested over their entire circumference?				
§192.243(d) (1)	In Class 1 locations, except offshore, at least 10 percent				x
§192.243(d) (2)	In Class 2 locations, at least 15 percent.				x
§192.243(d) (3)	In Class 3 and Class 4 locations, at crossings of major or navigable rivers, offshore, and within railroad or public highway rights-of-way, including tunnels, bridges, and overhead road crossings, 100 percent unless impracticable, in which case at least 90 percent. Nondestructive testing must be impracticable for each girth weld not tested.				x
§192.243(d) (4)	At pipeline tie-ins, **100%.**				x
§192.243(f)	Are records showing by milepost, engineering station, or geographic feature, the number of girth welds made, the number tested, the number rejected, and the disposition of the rejects retained for the life of the pipeline?				x
§192.153	**Components Fabricated by Welding** What test was conducted for prefabricated units? Does it meet the requirements of 192.153?				x

VIII. PART 192 – REPAIR OR REMOVAL OF WELD DEFECTS		S	N/I	U	N/A
§192.245	The operator's procedures should be inspected in the field to determine if they are being followed.				x

IX. PART 192 – RECORDS OF JOINING OF PIPELINE MATERIALS OTHER THAN BY WELDING		S	N/I	U	N/A
	What types of joining does the operator perform (i.e. plastic fusion, mechanical joints, electrofusion)? List out all types of joining used.				
§192.756	Has the fusion equipment been maintained as required?	x			
§192.283	Does operator have written procedures for each type of joint available for review? (yes or no)	x			
	Do these procedures follow what is required by the manufacturer? Has the operator changed any parameters? (yes or no)	x			

IX. PART 192 – RECORDS OF JOINING OF PIPELINE MATERIALS OTHER THAN BY WELDING		S	N/I	U	N/A
	Does operator have copies of the destructive tests used to qualify the joining procedures? (yes or no) (a) Heat fusion, solvent cement, and adhesive joints. Before any written procedure established under § 192.273(b) is used for making *plastic pipe joints* by a heat fusion, solvent cement, or adhesive method, the procedure must be qualified by subjecting specimen joints that are made according to the procedure to the following tests, as applicable: (1) The test requirements of-- (i) In the case of *thermoplastic* pipe, based on the pipe material, the Sustained Pressure Test or the Minimum Hydrostatic Burst Test per the listed specification requirements. Additionally, for electrofusion joints, based on the pipe material, the Tensile Strength Test or the Joint Integrity Test per the listed specification. (ii) In the case of thermosetting plastic pipe, paragraph 8.5 (Minimum Hydrostatic Burst Pressure) or paragraph 8.9 (Sustained Static Pressure Test) of ASTM D2517- 00 (incorporated by reference, see § 192.7). (iii) In the case of electrofusion fittings for polyethylene (PE) pipe and tubing, paragraph 9.1 (Minimum Hydraulic Burst Pressure Test), paragraph 9.2 (Sustained Pressure Test), paragraph 9.3 (Tensile Strength Test), or paragraph 9.4 (Joint Integrity Tests) of ASTM F1055-98(2006) (incorporated by reference, see § 192.7). (2) For procedures intended for lateral pipe connections, subject a specimen joint made from pipe sections joined at right angles according to the procedure to a force on the lateral pipe until failure occurs in the specimen. If failure initiates outside the joint area, the procedure qualifies for use. (3) For procedures intended for non-lateral pipe connections, perform testing in accordance with a listed specification. If the test specimen elongates no more than 25% or failure initiates outside the joint area, the procedure qualifies for use. (b) Mechanical joints. Before any written procedure established under § 192.273(b) is used for making mechanical plastic pipe joints, the procedure must be qualified in accordance with a listed specification based upon the pipe material. (c) A copy of each written procedure being used for joining plastic pipe must be available to the persons making and inspecting joints.	x			
192.285(a)(1) 192.285(a)(2) and 192.285(c)	Does operator have copies of employee training dates and type of join training for each employee? (yes or no)	x			
	Does operator have copies of employee making specimen joints from pipe sections joined according to the procedure that passes inspection and test as set forth in 192.285(b)?	x			
	Does the operator maintain records of each employee's requalification? (yes or no) (c) A person must be re-qualified under an applicable procedure once each calendar year at intervals not exceeding 15 months, or after any production joint is found unacceptable by testing under §192.513. *Note: be sure to see if operator has applied for and obtained a waiver on this issue and make sure they are following the waiver requirements.*	x			

IX. PART 192 – RECORDS OF JOINING OF PIPELINE MATERIALS OTHER THAN BY WELDING		S	N/I	U	N/A
192.287	Is each person that inspects joints in plastic pipe qualified by appropriate training or experience in evaluating the acceptability of plastic pipe joints?	x			
§192.285(e)	For plastic transmission pipe: Are records required to be kept for a minimum of 5 years after construction? revised with Mega Rule implementation 7/1/2020				x

X. PART 192 – INSPECTION & REPAIR OF MATERIALS		S	N/I	U	N/A
§192.307	The operator's procedures should be inspected in the field to determine if they are being followed.				x

XI. PART 192 – ABNORMAL OPERATIONS: TRANSMISSION LINES		S	N/I	U	N/A
§192.605(c)	Has the operator had any occurrences of the following conditions in the last 2 years (yes or no): - Unintended closure of valves or shutdowns - An increase or decrease in pressure or flow rate outside of normal operating limits - Loss of communications - The operation of any safety device - Any other malfunction of a component - Any deviation from normal operation - Any other foreseeable malfunction of a component, deviation from normal operation, or personnel error List out what type and date of occurrence.				
§192.605(c)(4)	If abnormal operation occurred, did operator review personnel response considering the actions taken, whether procedures were followed, and whether procedures were adequate or should be revised? Was this review documented?				x

XII. PART 192 – DAMAGE PREVENTION and FAILURE INVESTIGATION		S	N/I	U	N/A
§192.614	Does the operator have a list of persons/companies that engage in excavating? (yes or no) No damages have occurred in past few years.				x
	What actions are taken when damage prevention procedures are not followed?				x
	Does operator maintain records of accidents and failures and their causes?				x
	Has operator addressed the causes of failure to minimize the possibility of recurrence?				x
	Did the operator follow its written procedures pertaining to notification of excavation, marking, positive response and the use of the one call system?				x
	What is the operator's number of pipeline damages per 1,000 locate requests?				x
	What were the causes of 3rd party damage? No locates requested? Facilities not marked? Marks were incorrect? Other?				x

XII. PART 192 – DAMAGE PREVENTION and FAILURE INVESTIGATION		S	N/I	U	N/A
	Is the leak response information well documented for 3rd party damages?				x
§192.617	a) Does the operator have a procedure for failure investigations? Does it include sending failure to lab for analysis if appropriate?				x
	b) Does the operator develop, implement and incorporate lessons learned from the failure or incident review into its procedures? Does it include personnel training, qualification programs, design, construction, testing, maintenance, operations and emergency procedures?				x
	c) (Transmission) Does the operator have a procedure that if an incident involves closure of a rupture mitigation valve (RMV) or alternative equipment that there is post incident analysis of all the factors that may have been impacted. (see code for more information) Rupture rule				x
	d) (Transmission) Rupture post-failure and incident summary must be completed within 90 days. (see code for more information) Rupture rule				x

XIII. PART 192 – PUBLIC EDUCATION		S	N/I	U	N/A
	Procedures for §192.616 – This information is covered in a separate inspection checklist.				

XIV. PART 192 – MAXIMUM ALLOWABLE OPERATING PRESSURE RECORDS		S	N/I	U	N/A
	Does the operator determine MAOP correctly?	x			
§192.619/ §192.621/ §192.623	Is the MAOP commensurate with the class location? revised with Mega Rule implementation 7/1/2020	x			
	(a) How is the MAOP determined? (1) By design pressure of weakest element? (See Subparts C & D)	x			
	(2) By test pressure				x
	(3) By highest operating pressure to which the segment of line was subjected during the preceding 5 years.				x
	(4) Pressure determined by operator to be maximum safe pressure.				x
§192.619	(a)(1) Have any pipelines been converted under 192.14? If so was MAOP established properly?				x
	(e) Have any transmission lines met the criteria of 192.624? Was MAOP established and documented in accordance with 192.624. (Transmission in an HCA, Class 3, or Class 4 and >=30% SMYS: If not TVC, an MAOP reconfirmation is required see 192.624.)				x
	(f) Are records necessary to establish and document the MAOP available?				x
§192.624	(Transmission in an HCA, Class 3, or Class 4 and >=30% SMYS: If not TVC, an MAOP reconfirmation is required see 192.624.) Has there been a reconfirmation of the pipeline's MAOP? revised with Mega Rule implementation 7/1/2020				x

XIV. PART 192 – MAXIMUM ALLOWABLE OPERATING PRESSURE RECORDS		S	N/I	U	N/A
§192.632	Transmission Only: Has an Engineering Critical Assessment for MAOP been conducted as necessary? revised with Mega Rule implementation 7/1/2020 (Or in TIMP Plan)				x

XV. PART 192 – PRESSURE LIMITING AND REGULATING STATION RECORDS		S	N/I	U	N/A
§192.739(a)	Does the operator perform and document inspections on pressure limiting relief devices and pressure regulators not to exceed 15 months, but at least annually to determine the following:	x			
	1) In good mechanical condition?	x			
	2) Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed?	x			
	3) Set to control or relieve at the correct pressures consistent with the pressure limits of §192.201(a)? (See exception in §192.739(b))	x			
	4) Properly installed and protected from dirt, liquids or other conditions that might prevent proper operation?	x			
§192.739(b)	Does the operator have any steel pipelines whose MAOP is determined under §192.619(c)? *If yes, the following control or relief pressures apply and inspector should double check operator calculations.* If the MAOP is 60 PSI gage or more, the control or relief pressure limit is as follows:				
	If the MAOP produces a hoopstress of: 1) 72 percent or greater then the pressure limit is the MAOP plus 4 percent. 2) Unknown as a percentage of SMYS, then the pressure limit is a pressure that will prevent unsafe operation of the pipeline considering its operating and maintenance history and MAOP.	x			
§192.740(a)	This section applies, except as provided in paragraph (c) of this section, to any service line directly connected to a production, gathering, or transmission pipeline that is not operated as part of a distribution system.				
§192.740(b)	(Farm Taps) Each pressure regulating or limiting device, relief device (except rupture discs), automatic shutoff device, and associated equipment must be inspected and tested at least once every 3 calendar years, not exceeding 39 months, to determine that it is:				
	(1) In good mechanical condition;	x			
	(2) Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed;	x			
	(3) Set to control or relieve at the correct pressure consistent with the pressure limits of §192.197; and to limit the pressure on the inlet of the service regulator to 60 psi (414 kPa) gauge or less in case the upstream regulator fails to function properly; and	x			
	(4) Properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.	x			

XV. PART 192 – PRESSURE LIMITING AND REGULATING STATION RECORDS		S	N/I	U	N/A
§192.743	Does the operator perform and document inspections on relief devices not to exceed 15 months but at least once each calendar year to determine the following? Relief capacity calculation has not been done for all regulator stations. If testing is done in the field, it must be documented.			x	
	(a) Has sufficient capacity been determined by testing in place or by review and calculations?			x	
	(b) Are calculations used to determine capacity available?			x	
	(c) Required that unsatisfactory conditions be corrected in an appropriate time frame?			x	

XVI. PART 192 – TELEMETERING OR RECORDING GAUGE RECORDS-DISTRIBUTION		S	N/I	U	N/A
§192.741(a)	Does the operator have telemetering or pressure recording gauges to indicate gas pressure in the district that is supplied by more than one district pressure regulating station? (yes or no)				x
§192.741(b)	Has the operator determined if telemetering or pressure recording gauges are needed for a distribution system supplied by only one district pressure regulating station? (yes or no)				x
§192.741(c)	Does the operator inspect equipment and take corrective measures when there are indications of abnormally high or low pressure? (yes or no)				x
	Are these inspections documented within the operator's records? (yes or no)				x

XVII. PART 192 – PREVENTION OF ACCIDENTAL IGNITION		S	N/I	U	N/A
§192.751	The operator's procedures should be inspected in the field to determine if they are being followed.		x		

XVIII. PART 192 – DIMP/TIMP		S	N/I	U	N/A
	Discuss actions that the operator has been taking for their DIMP/TIMP plan. Inspected DIMP this year.		x		
	Have there been any indications of Di-thiazine in the pipeline? None detected.				x