

# Inspection Statistics 2024 Year in Review



## 2024 Review of Inspections

- Inspections performed in 2024
  - 87 Inspections with 42 Different Operators



Type of Inspection	Gas Distribution	Gas Trans	Hazardous Liquid	Gas Gathering	TOTAL
<b>No. of Operators</b>	<b>5</b>	<b>10</b>	<b>4</b>	<b>23</b>	<b>42</b>
Operator Qualifications (OQ)	4	0	1	1	6
Public Awareness Program (PAP)	1	5	1	2	9
Standard Records /OQ Field	18	1	0	8	27
Drug and Alcohol	1	3	3	6	13
Standard Records	2	1	0	7	10
Operation & Maintenance	3	2	0	3	8
Transmission Integrity Management Plan (TIMP)	0	1	0	0	1
Liquid Integrity Management Plan (LIMP)	0	0	3	0	3
DIMPI	3	0	0	0	3
Control Room Management (CRM)	1	0	1	0	2
Distribution Integrity Management Plan (DIMP)	3	0	0	0	3
Design (DES)	0	2	0	0	2
<b>TOTAL</b>	<b>36</b>	<b>15</b>	<b>9</b>	<b>27</b>	<b>87</b>

## 2024 Review of Inspections

### • Definitions

- Unsatisfactory - when it does not appear to meet code requirements, or the operator has failed to meet the minimum code requirements.
- Concern – when the operator meets requirements, but is an area of recommendation or concern that if not addressed may lead to a non-compliance, or improvements could be made. For a records review, concern could be used to document forms with mistakes or missing information.



## 2024 Review of Inspections

87 Inspections with 42 Different Operators

- 32 Unsatisfactory Results from all Inspections
  - 0 Unsatisfactory Results from the Gas Distribution Inspections
  - 14 Unsatisfactory Results from the Gas Transmission Inspections
  - 18 Unsatisfactory Results from the Hazardous Liquid Inspections
  - 0 Unsatisfactory Results from the Gas Gathering Inspections
- 145 Concerns from all Inspections
  - 35 Concerns from the Gas Distribution Inspections
  - 70 Concerns from the Gas Transmission Inspections
  - 28 Concerns from the Hazardous Liquid Inspections
  - 12 Concerns from the Gas Gathering Inspections



## 2024 Review of Inspections

- 1 findings / inspection for Gas Distribution
- 5 ½ findings / inspection for Gas Transmission
- Approximately 5 findings / inspection for Hazardous Liquid
- Approximately 1 finding / two inspections for Gas Gathering



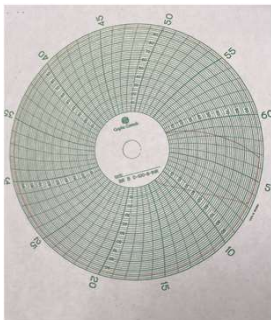
## 2024 Review of Inspections

- Gas Distribution - 36 Inspections with 5 Operators
  - 0 - Unsatisfactory findings (5 Operators)
  - 35 Concerns (All 5 Operators had concerns)
    - 16 - Records
    - 11 - Procedures
    - 5 - Gas Distribution Integrity Management



## 2024 Review of Inspections

- Gas Distribution - 36 Inspections with 5 Operators
  - 35 Concerns (All 5 Operators had concerns)
    - 16 - Records
      - 6 - Pressure Test
        - Do records indicate that plastic components and fittings are able to withstand operating pressures and other anticipated loads in accordance with a listed specification -- Insufficient material detail of all components to determine MAOP



## 2024 Review of Inspections

- Gas Distribution - 36 Inspections with 5 Operators
  - 35 Concerns (All 5 Operators had concerns)
    - 16 - Records - Continued
    - 5 - Operations and Maintenance
      - Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required -- List actual MAOP number on documentation, not range, i.e. 7 to 11 inches w.c
      - Do records indicate that mains are installed with clearances specified in 192.325, and (if plastic) installed as to prevent heat damage to the pipe -- Operator needs to begin collecting the data on clearance of crossings during construction



## 2024 Review of Inspections

- Gas Distribution - 36 Inspections with 5 Operators
  - 35 Concerns (All 5 Operators had concerns)
    - 16 - Records - Continued
    - 4 - Corrosion Control
      - Do records document that the CP monitoring criteria used was acceptable -- Excessively high cathodic readings 3 and 4 volts
      - Do records adequately document that exposed buried piping was examined for corrosion -- Operator does not have process to document when pipe exposed by others or exposed for other reasons



## 2024 Review of Inspections

- Gas Distribution - 36 Inspections with 5 Operators
  - 35 Concerns (All 5 Operators had concerns) – Continued
    - 11 - Procedures
      - 4 – Joining of Pipeline Materials
        - Does the operator's process ensure that the bend radius of plastic pipe does not exceed the minimum bend radius specified by the manufacture for the diameter being installed -- O&M to specify what minimum bend radius is for diameter of pipe being installed
    - 2 - Corrosion Control
      - Does the process require that exposed portions of buried pipeline must be examined for external corrosion -- Procedure be expanded to have exposed metallic pipe be investigated circumferentially and longitudinally beyond exposed portion if corrosion discovered



## 2024 Review of Inspections

- Gas Distribution - 36 Inspections with 5 Operators
  - 35 Concerns (All 5 Operators had concerns) – Continued
    - 5 Gas Distribution Integrity Management
      - Preventive and Mitigative Measures
        - Do records demonstrate implementation of the measures, required by Part 192 Subpart P, to reduce risk – Concern, information to be gained from new assets not being applied



## 2024 Review of Inspections

- Gas Transmission - 15 Inspections with 10 Operators
  - 14 Unsatisfactory – 2 Operators
    - 7 Integrity Management
      - 3 Quality Assurance
        - Does the process for measuring IM program effectiveness include the elements necessary to conduct a meaningful evaluation -- Records were not adequate to demonstrate a review of the program as required by ASME B31.8S-2004. The operator could not demonstrate that the IMP Annual Review was completed as required by Operators IMP
    - 3 Risk Analysis
      - Do records demonstrate that all potential threats to each covered pipeline segment have been identified and evaluated -- The operator could not demonstrate that relevant factors such as flooding, lightning susceptibility, underground mining operations and other potential threats were considered for each covered segment.



## 2024 Review of Inspections

- Gas Transmission - 15 Inspections with 10 Operators
  - 14 Unsatisfactory – 2 Operators - Continued
    - 3 Training and Qualifications
      - 3 Qualification of Personnel
        - Does the process require that operator/vendor personnel (including supervisors and persons responsible for preventive and mitigative measures), who review and evaluate results meet acceptable qualification standards -- Qualifications for IM tasks as specifically required by 192.915(b) and (c) were not specified by the operator.



## 2024 Review of Inspections

- Gas Transmission - 15 Inspections with 10 Operators
  - 14 Unsatisfactory – 2 Operators - Continued
    - 2 Assessment and Repair
      - 2 In-Line Inspection
        - Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ILI assessment results meet appropriate training, experience, and qualification criteria -- The operators plan is vague in listing the qualification of supervisory and other personnel who perform integrity related tasks



## 2024 Review of Inspections

- Gas Transmission - 15 Inspections with 10 Operators
  - 70 Concerns – 6 Operators
    - 42 Design and Construction Integrity Management
      - 23 Design of Pipe Components
        - Do written specifications stipulate that each external protective coating must be inspected just prior to lowering the pipe into the ditch and backfilling, and any damage detrimental to effective corrosion control must be repaired -- Procedures should clarify maximum holiday size to use patch sticks. Procedure is needed to establish holiday testing prior to lowering in.
        - Do operator's written specifications stipulate that the cathodic protection system must be designed and installed to comply with one or more of the applicable criteria contained in Appendix D of Part 192 -- Procedures do not specify that any CP installed will be designed to meet Appendix D requirements.





## 2024 Review of Inspections

- Gas Transmission - 15 Inspections with 10 Operators
  - 70 Concerns – 6 Operators
    - 42 Design and Construction Integrity Management - Continued
    - 5 Construction



- Does the process require that piping be installed such that stresses are minimized and the coating is protected -- Procedures lack specificity for minimize stresses and protecting coating

## 2024 Review of Inspections

- Gas Transmission - 15 Inspections with 10 Operators
  - 70 Concerns – 6 Operators - Continued
    - 13 Integrity Management
    - 5 Quality Assurance



- Do records demonstrate that the methods to measure Integrity Management Program effectiveness provide effective evaluation of program performance and result in program improvements where necessary -- Most of the indices were indicated as zero. Improvements to the effectiveness evaluation program

## 2024 Review of Inspections

- Gas Gathering - 27 Inspections with 23 Operators

- 0 Unsatisfactory
- 12 Concerns - 7 Operators
  - 7 Time Dependent Threats



- 3 External Corrosion - Do records indicate the location of all corrosion control items listed in §192.491(a) -- location of corrosion control items not available (recent acquisition)
- Do records document the actions taken when corrosive gas is being transported by pipeline -- Moisture readings do not contain accuracy to ascertain if gas is saturated.

## 2024 Review of Inspections

- Gas Gathering - 27 Inspections with 23 Operators

- 12 Concerns - 7 Operators - Continued
  - 2 Maintenance and Operations



- 2 MAOP - Do records indicate operation within MAOP limits, plus the build-up allowed for operation of pressure-limiting and control devices, was assured while starting up and shutting down any part of the pipeline -- Records required to demonstrate MAOP can not be exceed with overpressure equipment

## 2024 Review of Inspections

- Hazardous Liquid - 9 Inspections with 4 Operators
  - 18 Unsatisfactory - Two Operators
    - 14 Integrity Management
      - 7 Preventative and Mitigative Measures
        - Do records demonstrate that the process of identification and evaluation for Preventive & Mitigative Measures (P&M Measures) has been applied in accordance with the documented process – Do what your IMP plan says



## 2024 Review of Inspections

- Hazardous Liquid - 9 Inspections with 4 Operators
  - 18 Unsatisfactory - Two Operators - Continued
    - 14 Integrity Management
      - 3 Continual Evaluation and Assessment
        - Do the records indicate that selected assessment methods are appropriate for the specific integrity threats to the pipe segment -- Inadequate records
    - 3 Quality Assurance
      - Do the records indicate that performance metrics are providing meaningful insight into integrity management program performance – Documentation lacking



## 2024 Review of Inspections

- Hazardous Liquid - 9 Inspections with 4 Operators

- 28 Concerns - 3 Operators

- 14 Assessment and Repair

- 7 In-Line Inspection



- Does the process specify qualification requirements for personnel who review and evaluate ILI integrity assessment results and information analysis – The operators plan is vague in listing the qualification of supervisory and other personnel who perform integrity related tasks

- Does the process include the validation of ILI results -- No parameters in Operators IMP to validate the ILI results

## 2024 Review of Inspections

- Hazardous Liquid - 9 Inspections with 4 Operators

- 28 Concerns - 3 Operators

- 14 Assessment and Repair - Continued

- 5 Integrity Assessments



- Do the records indicate that recognized industry practices, or an acceptable alternative method, have been incorporated in performing integrity assessments -- No evidence that API 1160, NACE SP0102 and ANSI ILI-PQ-2005 being utilized in guidance of ILI vendor specifications

## 2024 Review of Inspections

- Hazardous Liquid - 9 Inspections with 4 Operators
  - 28 Concerns - 3 Operators - Continued
    - 13 Integrity management
      - 4 Continual Evaluation and Assessment
        - Does the process include all of the risk factors that reflect the conditions on the pipe segment to establish an assessment interval -- All the risk factors for establishing an assessment schedule is not listed as part of the Operator's IMP plan
    - 3 High Consequence Areas
      - Do records indicate that locations and boundaries of HCA-affecting pipe segments are correctly identified and maintained up-to-date - Operator could not identify what was the cause of the ecological HCA, i.e. vegetation, species, land or water based.



## 2024 Review of Inspections

Unsatisfactory - Category			Concern - Category	
21	Integrity Management	43	Design and Construction	
4	Assessment and Repair	26	Integrity Management	
3	Training and Qualification	18	Assessment and Repair	
1	Design and Construction	16	Records	

