

CERTIFIED MAIL

August 21, 2002

Michael Faulkenberry, P.E.
Chief Gas Engineer
Avista Utilities Corporation
East 1411 Mission
Spokane, Washington 99220

Dear Mr. Faulkenberry:

Subject: PE Bridge Crossings

The Washington Utilities and Transportation Commission (Commission) has the authority to enforce the minimum safety regulations per Chapter 480-93 of the Washington Administrative Code (WAC) pertaining to the construction, maintenance, and operation of pipelines transporting natural gas in the state of Washington. In addition, the Commission adopts the Code of Federal Regulations (CFR) Title 49 Part 191 and 192.

On May 9, 2000, Avista Utilities Corporation (Avista) filed a petition with the Commission in Docket No. UG-000866 for a waiver of 49 CFR 192.321(a) *Plastic pipe must be installed below ground level unless otherwise permitted by paragraph (g) of this section.* Avista intended to insert polyethylene (PE) pipe into a larger diameter steel casing, then affix the casing above ground to a bridge crossing located in Stevenson, Washington. Avista was to install a 4-inch PE pipeline into an 8-inch steel casing. The above ground steel casing would then be affixed to a bridge that crossed over Rock Creek.

On April 12, 2001, Avista filed a second petition with the Commission in Docket UG-010405 for a similar waiver of 49 CFR 192.321(a) for two PE bridge crossings located in Spokane, WA. Avista was to install a 6-inch PE pipeline into a 10-inch steel casing. The above ground steel casing would then be affixed to bridges that cross over the Spokane and Little Spokane Rivers.

In both cases, Staff reviewed the petitions and design specifications submitted by Avista and recommended the Commission accept the petitions with the following suggested requirements:

1. Conduct quarterly leak surveys with an approved combustible gas indicator (CGI) for two years following installation.
2. After 2 years, conduct leak surveys during regular patrols.
3. Conduct daily temperature readings during the high and low yearly temperatures to establish a baseline for the maximum amount of expansion and contraction the PE pipe experiences.

4. Ensure that the temperature baselines are commensurate with the design limitations of the PE pipe.

Following receipt of Commission approval, Staff sent the request for approval by the federal Office of Pipeline Safety (OPS). Since the request was for a waiver of a federal code, OPS needed to consider and approve the request as well. OPS approved the waiver contingent on the specific maintenance requirements being performed.

During an inspection of Avista's Goldendale/Stevenson area conducted in June 2002, Staff found Avista was not performing the required quarterly leak surveys on the Rock Creek PE bridge crossing located in Stevenson, Washington. Further investigation yielded the same findings for the Spokane and Little Spokane River crossings located in Spokane, Washington.

Since notification in June, Avista personnel began leak surveying the three PE bridge crossings as part of their quarterly leak survey tasks.

The cities of Stevenson and Spokane are located within regions of the State that may experience extreme temperatures, both hot and cold. The purpose of the quarterly leak survey requirement was to not only discover a leak, but to ensure the integrity of the installation and public safety under extreme conditions. Avista's lack of compliance with the waiver requirements may have placed the public at increased risk.

At this time, Staff is not proposing to recommend Commission action against Avista for its omissions with regard to the quarterly leak surveys. Instead, we request that Avista provide Staff with copies of the completed leak survey reports for these three bridge crossings, as well as the next six quarters to ensure that this issue is being covered appropriately.

If you have any questions or if Staff may be of any assistance, please contact Wayne Wienholz II, Pipeline Safety Engineer, at (360) 664-1239.

Thank you for your cooperation and interest in pipeline safety.

Sincerely,

Douglas Kilpatrick, P.E.
Pipeline Safety Director

Enclosure

cc: Stacey Gerard, OPS
Chris Hoidal, OPS

WW/lw