

December 19, 2002

Chris Hoidal, Director  
Office of Pipeline Safety  
Western Regional Office  
12600 West Colfax Avenue, Suite A-250  
Lakewood, Colorado 80215

Dear Mr. Hoidal:

**Subject: Request for Waiver of 49 CFR 192.321(a) to Allow a Steel Encased PE Bridge Crossing**

The Washington Utilities and Transportation Commission (WUTC) has reviewed and approved the following request by Avista Utilities Corporation (Avista) for a waiver of compliance with 49 CFR 192.321(a). The request involves the installation of approximately 339 feet of 6-inch polyethylene (PE) pipe in a 10-inch steel casing on the underside of the Argonne Road Bridge over the Spokane River located in Spokane, Washington. The PE will be protected from ultraviolet light, mechanical damage and stress limits for plastic pipe as required by Part 192. The attached request from Avista outlines the construction requirements to be followed during the installation. In addition, Avista has agreed to the following additional requirements imposed by the Commission, as recommended by the WUTC Pipeline Safety Staff:

1. Conduct quarterly leak surveys with an approved Combustible Gas Indicator for 2 years.
2. After 2 years, conduct leak surveys during 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 will experience.
4. Ensure that the temperature baselines will be commensurate with the design limitations of the PE pipe.
5. Add the following to Avista's Operations and Maintenance Procedures Manual:
  - a. Details of any record keeping requirements specific to the installation.
  - b. Details of any special record keeping requirements specific to the installation.

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WUTC staff is forwarding this request to you for your review and approval. If you have any questions or if staff may be of any assistance, please contact Scott Rukke, Pipeline Safety Engineer at (360) 664-1241.

Sincerely,

Douglas Kilpatrick, P.E.  
Pipeline Safety Director

Enclosures

cc. Michael J. Faulkenberry, Avista Utilities Corps.