Cardinal FG Company
A Cardinal Glass Industries Company

545 Avery Road West
Winlock, WA 98596
360.242.4300
360.266.0047 facsimile
www.cardinalcorp.com

6/9/2010

re: Docket PG-100017

David Lykken
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
Olympia WA, 98504-7250

Dear Mr. Lykken:

Please find attached the Cardinal FG response to the 2010 Natural Gas Pipeline Standard Inspection, Docket PG-100017

Should you have any questions please do not hesitate to contact us directly.

Sincerely,

Steve Smith
Plant Manager
Cardinal FG

cc Cosentino Consulting Inc.
Pipeline facility files

Response to Cardinal Glass 2010 Natural Gas Pipeline Safety Inspection
Docket PG-100017

1. **49 CFR §192.463 External Corrosion Control: Cathodic protection**

   (a) Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in appendix D of this part.

   Appendix D to Part 192—Criteria for Cathodic Protection and Determination of Measurements

   II. Interpretation of voltage measurement. *Voltage (IR) drops other than those across the structure-electrolyte boundary must be considered for valid interpretation of the voltage measurement in paragraphs A(1) and (2) and paragraph B(1) of section I of this appendix.*

   Charge:
   Cardinal does not have a process in their O&M manual to consider the IR drop when interpreting the level of cathodic protection on their pipeline facilities.

   Finding(s):
   No evidence was presented to show that IR drop was considered when determining the level of cathodic protection on pipeline facilities.

   Response:
   A National Association of Corrosion Engineers (NACE) certified corrosion engineer will be engaged to develop a facility specific protocol to address IR drop when determining the level of cathodic protection on pipeline facilities. The protocol will be developed and incorporated into facility procedures by December 1, 2010

2. **49 CFR §192.616 Public Awareness**

   49 CFR 192.616(d) states the operator's public awareness program must specifically include provisions to educate the public. Appropriate governmental organizations and persons engaged in excavation related activities on:

   1. *Use of one call notification system prior to excavation and other damage prevention activities;*
   2. *Possible hazards associated with unintended releases from hydrogen pipeline facility;*
   3. *Physical indications that such a release may have occurred;*
   4. *Steps that should be taken for public safety in the event of a pipeline release; and*
   5. *Procedures for reporting such an event.*

   Charge:
   Cardinal did not provide proof that the public was educated as required by 49 CFR §192.616 Public Awareness Section (d)(1-5).

Finding(s):
Cardinal did not educate the public as required in 49 CFR §192.616(d)(1-5). No evidence was presented to confirm that the public was provided with required educational materials.

Response:
A pipeline specific public information mailer has been developed, see attachment 1. The document is also available at the facility for inspection. The 2010 distribution will occur prior to December 31, 2010

ATTACHMENT 1

Cardinal FG

(Month here) 2010

This mailing has been sent to you as part of the Cardinal FG public education program, as required by State of Washington and the United States Department of Transportation pipeline safety regulations.

Cardinal FG owns and operates a natural gas pipeline in Lewis County, Washington. The pipeline begins at the Williams Pipeline Facility located at 156 Meier Road West in Winlock WA and ends at the Cardinal FG facility located at 545 Avery Road West in Winlock WA. The pipeline is mainly located in the right of ways of Interstate 5 and Antrim Road. A map of the pipeline route is on the reverse side of this letter.

Your property is located adjacent to or near the Cardinal FG pipeline or you are a contractor performing work in the Winlock Washington area. The location of the Cardinal FG pipeline, and that of other pipelines in the United States, can be identified by various means. The Cardinal FG pipeline location is generally identified by yellow fiberglass stakes containing the words "Warning" or "Caution" followed by "Natural Gas Pipeline" and a telephone number to call for more information.

The primary cause of damage to pipelines in the United States is due to excavation damage. Accordingly, the State of Washington requires **ANYONE PERFORMING EXCAVATION**, which could mean performing work as complicated as installing new utilities or as simple as tilling for a new garden, **MUST CONTACT THE LOCAL ONE-CALL SERVICE FOR TO LOCATE UNDERGROUND UTILITIES.**

48 HOURS BEFORE YOU EXCAVATE, AUGUR, GRADE, TRENCH, OR BLAST, Contact the Washington State One Call Center at 800-424-5555 and request that any pipelines or other utilities on your property be located before you begin work. THERE IS NO COST TO YOU for this service.

How do I recognize a pipeline leak?

1. **By Sight:** Any of the following could indicate a pipeline leak - dirt being blown into the air, water bubbling or being blown in the air, fire coming from the ground or appearing to burn above the ground, dead or dying vegetation in an otherwise green area, a dry spot in an otherwise moist field.

2. **By Sound:** A roaring, blowing, or hissing sound could indicate a pipeline leak.

3. **By Smell:** Biogas has a rotten egg smell.

What do I do if I think that I have detected a pipeline leak?

CAUTION Natural Gas Is Flammable

1. Turn off and abandon any motorized equipment you may be operating.

2. Leave the area quickly on foot.

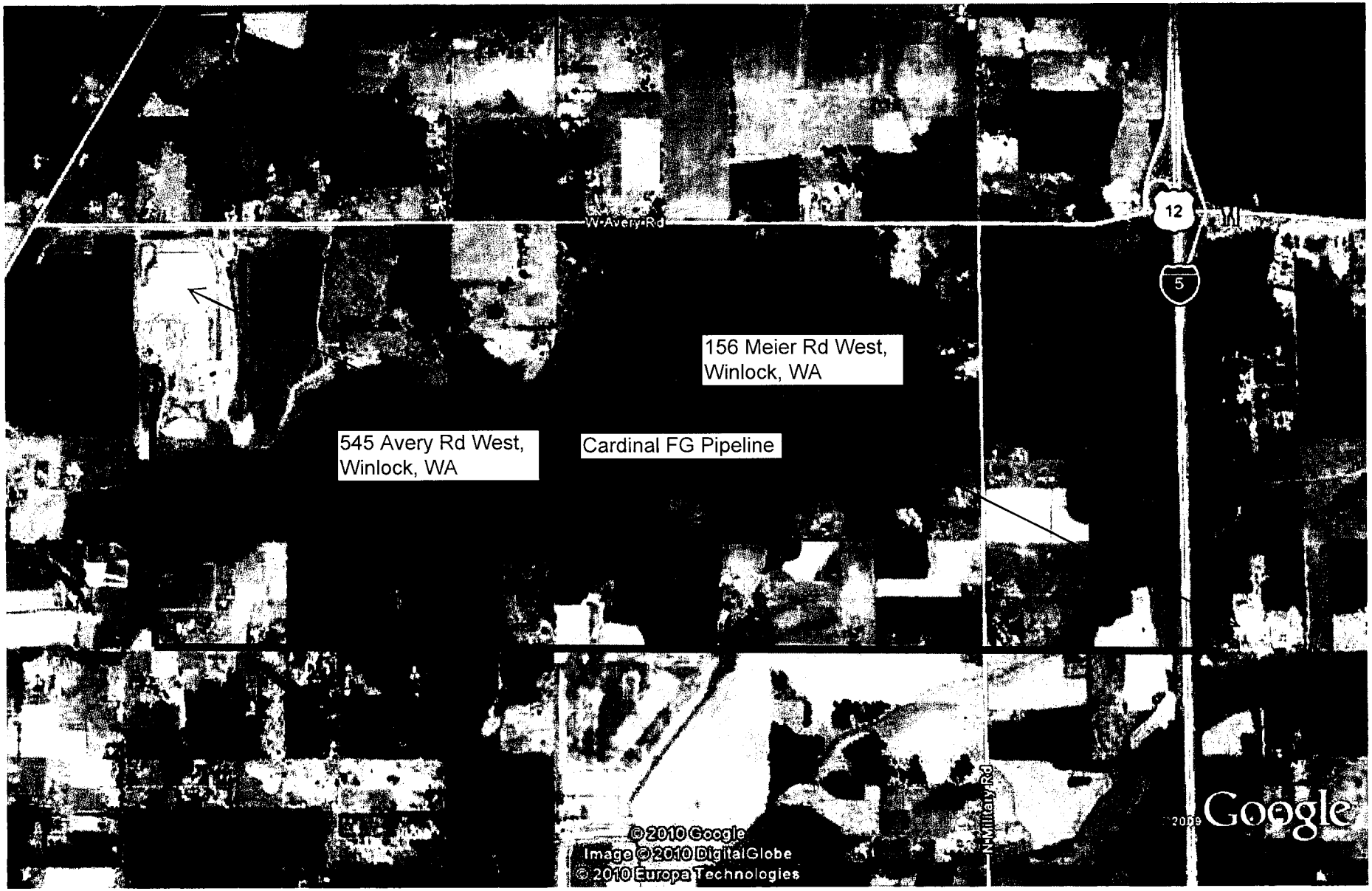
3. Do not light a match, start an engine, use a telephone, switch on/off light switches or do anything that may create a spark.

4. From a safe location, **call 911** with information about the suspected leak.

5. Warn others.

6. Do not drive or walk back into the suspected leak area until emergency response personnel have determined that the area is safe.

If you have any questions concerning the Cardinal FG pipeline, please contact the Cardinal FG Pipeline Manager at (360) 242-4296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