



SOLVAY CHEMICALS

April 8, 2011

David Lykken, Pipeline Safety Director
Washington Utilities and Transportation Commission
1300 S Evergreen Park Dr SW
PO Box 47250
Olympia WA 98504-7250

RE: DOCKET PG-110043

Dear Mr. Lykken:

The referenced docket cites a probable violation resulting from the 2011 Interstate Gas Standard Inspection of the Solvay Chemicals, Inc hydrogen pipeline in Longview, WA.

WAC 480-93-188 (3) (e) requires that each gas pipeline company must conduct leak surveys for unodorized gas pipelines at least monthly. As stated in the finding, Solvay is currently conducting leak surveys at two month intervals for our unodorized hydrogen pipeline.

As you know, our small section of hydrogen pipeline came under WUTC jurisdiction in 2009. However, it has always been of prime importance to Solvay that we operate and maintain the pipeline in a manner to assure public safety. To that end and since the compliance process was unfamiliar to us at the time, we solicited assistance from the office of pipeline safety to guide us in developing our Operations, Maintenance, and Emergencies manual.

Solvay acknowledges the oversight with respect to leak survey frequency. Since receiving notification of the probable violation, we immediately made arrangements to begin conducting monthly leak surveys. The new requirement was implemented last month. We are currently in the process of revising our pipeline OME manual accordingly and will submit a revised copy to your staff by April 30, 2011.

Sincerely,

Mike Banigan
Manufacturing Manager/Site Coordinator