Summary of Written Comments Hazardous Liquids Pipeline Safety Rulemaking General Rules & Design, Repair and Construction

Chapter 480-75 WAC TO-000712

Rev: January			
WAC	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
480-75-007 Leak Detection	Lee A. James, P.E. Olympia, WA	(1) I agree completely with the idea of requiring leak detection. However, I feel the proposed rule should also specify the desired level of leak rate sensitivity (probably expressed as gallon/hour).	(1) Staff agrees with Mr. James and Mr. Wicklund's comment. Staff will redraft the proposed rule.
	Tom Wicklund, P.E. Olympic Integrity Manager BP Pipelines- North America	(1) WAC 480-75-007 (Leak Detection) is vague and needs to be clarified. "Small leaks" need to be defined more precisely.	
		(2) Furthermore, the requirement for no flow leak detection is only reasonable for short line segments, which can be positively isolated with pressure detection instruments. This section should also address record retention limits.	(2) Staff does not agree that small leaks can only be detected for short line segments. There is no relationship to the length of the pipe.
	Ralph W. Johns, Deputy Chief, Prevention, Education & Investigations City of Tacoma, Fire Department	(3) The Word "false" should be deleted in the second and third sentences. Both the procedures for responding as well as the records pertaining to leak detection and alarms need to be recorded not just for false alarms, and the concept of responding and the procedures designed for, should not be assuming that alarm will be false. Alarm could be indicating that there actually is a leak. Records may indicate that alarm was false or what the cause was of the alarm.	(3) Staff agrees – rule will be redrafted to reflect the change.

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WAC 480-75-008 (Overpressure Protection	Tom Wicklund, P.E. Olympic Integrity Manager BP Pipelines- North America	(4) We would like to point out that we believe the standard set in CFR 49 Part 195 – that relief protection be set at 110% MOP – is reasonable and need not be changed in the state's regulation. Design specifications currently employed by the industry, generally account for overpressure concerns.	(4) The standard set in Part 195 does not allow for continuous operation at 110% MOP. The proposed rule establishes the requirement that companies must have a pressure relief system and conduct appropriate surge analysis.
WAC 480-75-012 (Class Locations)	Tom Wicklund, P.E. Olympic Integrity Manager BP Pipelines- North America	(5) WAC 480-75-012 (Class Locations) has no equivalent in CFR 49 Part 195 and those requirements are normally reserved for gas pipelines service. We ask that the Commission revisit this section with special sensitivity to its application to the liquid pipelines industry.	(5) Rule 480-75-012 is for new construction.
		(6) While Olympic Pipe Line has not specifically reviewed the impacts of this requirement, such a rule could potentially impact design limits affecting crucial facilities such as our SeaTac Lateral, without direct correlation to safe and environmentally sound operations.	(6) Staff believes that the lower the stress on the pipeline the safer the pipeline is. This proposed rule is for new construction.
	Ralph W. Johns, Deputy Chief, Prevention, Education & Investigations City of Tacoma, Fire Department	(7) This section does not take into account building construction after a new pipeline is installed. It only regulates and classifies at the moment the pipeline is installed. I realize this is a very difficult issue, but it seems only to provide for one moment in time the necessary safety for the pipeline location and design factors; hence, after the pipeline is installed and new residential and/or commercial buildings are built, then the situation is no different than exists now with current existing pipelines.	(7) This new proposed rule applies to construction of new pipelines. For these new pipelines, companies will have to re-evaluate their class location periodically after the pipelines are put into service. This new proposal will be a new rule in the operation and

	In essence, this fails to provide any long-term additional	maintenance section of the
	safety.	rules. As for land
		development issues, that lies

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			with the local land-use agencies. They do the permitting of where development is allowed.
WAC 480-75-013 Design Factor (F) for Steel Pipe	Tom Wicklund, P.E. Olympic Integrity Manager BP Pipelines- North America	(8) WAC 480-75-013 (Design Factor (<i>F</i>) for Steel Pipe) diverges significantly from the standard set forth in CFR 49 Part 195.	(8) Staff agrees that the proposed rule does diverge from CFR 49 Part 195. This proposal applies to new construction – staff believes that the lower the stress in the pipeline the safer the system.
	Ralph W. Johns, Deputy Chief, Prevention, Education & Investigations City of Tacoma, Fire Department	(9) As stated above, again, the design factor based on class location only provides a reasonable level of safety at the time the pipeline is actually installed, subsequently, unless there is some moratorium on construction within the class location area, the class locations will change, but the pipe design factors will not.	(9) The design factor will change with a change in class location for new installations. Moratorium's on construction is a siting and land-use issue and not under the WUTC's jurisdiction.
WAC 480-75-014 (Backfill)	Tom Wicklund, P.E. Olympic Integrity Manager BP Pipelines- North America	(10) WAC 480-75-014 (Backfill) needs to be clarified. One-line states "rock and hard lumps" may be acceptable provided a "mechanical shield materials" is used to "protect the pipe and coating". Another paragraph states "bedding" material requirements but is unclear about where bedding is used.	(10) Staff agrees – Rule will be redrafted and section 2 will be deleted.

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WAC 480-75-022 (Location of Pump Stations and Breakout Tanks for Hazardous Liquid Pipelines)	Tom Wicklund, P.E. Olympic Integrity Manager BP Pipelines- North America	(11) WAC 480-75-022 (Location of Pump Stations and Breakout Tanks for Hazardous Liquid Pipelines) could be a severe and extremely onerous requirements causing route selection, pipeline length and cost-to-build to increase by orders of magnitude without appreciable benefit to public and environmental safety. We urge the Commission to revisit this proposed rule.	(11) Staff believes that this proposal is a safety related issue. Staff will discuss further with stakeholders at the next stakeholder meeting the adequacy of the 500 feet location . A portion of this rule is based on NTSB recommendations.
	Sarah Spence	(12) The standards often incorporate ASME standards. Why not adopt ASCE standards for waterlines. WA DOT Standards Specification – Section 7-8 and 7-10 Pages 7-21 to 7-26.	(12) Staff is researching and will discuss this comment with the stakeholder.

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