

**Summary of Written Comments  
Hazardous Liquids Pipeline Safety Rulemaking  
General Rules & Design, Repair and Construction  
Chapter 480-75 WAC  
TO-000712**

**Rev: January 9, 2002**

WAC	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
<b>480-75-007 Leak Detection</b>	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.



		In essence, this fails to provide any long-term additional safety.	maintenance section of the rules. As for land development issues, that lies
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ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
<p><b>WAC 480-75-013 Design Factor (F) for Steel Pipe</b></p>	<p>Tom Wicklund, P.E. Olympic Integrity Manager BP Pipelines- North America</p> <p>Ralph W. Johns, Deputy Chief, Prevention, Education &amp; Investigations City of Tacoma, Fire Department</p>	<p>(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.</p> <p>(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.</p>	<p>with the local land-use agencies. They do the permitting of where development is allowed.</p> <p>(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.</p> <p>(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.</p>
<p><b>WAC 480-75-014 (Backfill)</b></p>	<p>Tom Wicklund, P.E. Olympic Integrity Manager BP Pipelines- North America</p>	<p>(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.</p>	<p>(10) Staff agrees – Rule will be redrafted and section 2 will be deleted.</p>

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ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
<p><b>WAC 480-75-022 (Location of Pump Stations and Breakout Tanks for Hazardous Liquid Pipelines)</b></p>	<p>Tom Wicklund, P.E. Olympic Integrity Manager BP Pipelines- North America</p> <p>Sarah Spence</p>	<p>(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.</p> <p>(12) The standards often incorporate ASME standards. Why not adopt ASCE standards for waterlines.</p> <p>WA DOT Standards Specification – Section 7-8 and 7-10 Pages 7-21 to 7-26.</p>	<p>(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.</p> <p>(12) Staff is researching and will discuss this comment with the stakeholder.</p>

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