

**Summary of Written Comments
Hazardous Liquids Pipeline Safety Rulemaking
Operation and Maintenance
For January, 2002 Comments
TO-000712**

Revised: January 23, 2002

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
1) WAC 480-75-023 (Moving and Lowering Hazardous Liquid Pipelines)	Thomas A. Wicklund Olympic Integrity Manager BP Pipelines-North America	We would suggest the Commission consider reference to API RP 1117 "Movement of In-Service Pipelines" as a guide for pipeline operators to use in the developments of procedures related to moving or lowering pipelines.	Staff agrees. Rules language reflects the change.
2) WAC 480-75-024 (Monitoring and Inspection), 025 (Interference), 026 (Remedial Action), 027 (Atmospheric Corrosion Control) and 030 (Cathodic Protection).		As written, Part 195 subpart H (effective 1/28/02) provides guidance for corrosion prevention, and frequencies for monitoring and inspecting such systems. Part 195 also references ASME B31.4, which incorporates proven and recognized references from the National Association of Corrosion Engineers (NACE) standards. For this reason, the proposed changes are redundant and potentially conflicting.	Staff agrees with this comment and rules 024, 025, 027, and 030 will be deleted. Staff has made revision to rule 027.
3) WAC 480-75-028 (Inspection During Excavation)		No comments are provided at this time.	

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4) WAC 480-75-029 (Corrosion Control Records)		Guidance for retention of maps and records is specified in 49 CFR 195.404 (c)(3), and is now in place with the Commissions' adoption of 49 CFR 195. Requiring five-year retention period conflicts with current regulations for retention of cathodic protection records.	Staff agrees. Rule will be deleted.
5) WAC 480-75-031 (Valve Spacing for Rapid Shutdown)		At this time, additional information to is needed to fully understand the implications of the proposed section. It is noted that the proposal references "high stress" piping. This definition could cause confusion with the definition of "low stress" piping as defined in part 195 and currently adopted by the Commission.	Staff will define High Stress and Low Stress.
6) WAC 480-75-032 (Valves)		Field marking of valves is often difficult if not impossible to maintain. As written, Part 195 section 116 provides guidance for valve marking and identification. Consideration should also be given to the use of drawing and diagrams for valve identification.	Staff agrees and rule will be deleted.
7) WAC 480-75-033 (Right of Way Inspections)		49 CFR 195.412 defines the requirement for inspection of rights of way. Specifying a frequency of once per week does not account for limiting factors such as unfavorable weather conditions, natural disaster, restricted airspace, security concerns or other safety and operational difficulties. Such a frequency may also add unwarranted exposures of personnel and the public. Consider deleting this section or maintaining the above-mentioned section of Part 195 as currently adopted.	Staff disagrees. Many operators are currently performing this task daily. Right of Way inspections can be performed by drive-bys. Right of way inspections are key to minimizing third party damage.

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<p>8) WAC 480-75-034 (Aboveground Facilities)</p> <p>9) WAC 480-75-035 (Pipeline Markers)</p>		<p>No comment at this time.</p> <p>Part 195.410 is very specific and specifies appropriate requirements for the marking of pipelines and pipeline facilities. The adoption of 49 CFR 195 has already incorporated the suggested requirements.</p>	<p>Staff agrees. Rule will be deleted.</p>