

**POST INSPECTION MEMORANDUM**

**Inspector:** Al Jones / WUTC  
**Reviewed:** Joe Subsits /WUTC 10/22/2010  
**Peer Reviewed:** \_\_\_\_\_  
**Follow-Up Enforcement:**  
PCP\* PCO\* NOA WL LOC  
**Director Approval:**

**Date:** September 25, 2010

**Operator Inspected:** TransCanada Transmission Northwest (GTN)

**OPID:** 15014

**Region:** Western

**Unit Address:**

201 West North River Drive  
Spokane, WA 99201

**Unit Inspected:** Wallula, WA.

**Unit ID:** 3605

**Unit Type:** Interstate

**Inspection Type:** I01-Abbreviated Procedures Standard Inspection and I08-OQ Field Verification

**Record Location:** Spokane, WA

**Inspection Dates:** 8/23/2010 through 8/27/2010

**AFOD:** 5

**SMART Activity Number:**

**Operator Contact:** Ken Leier, Regional director

**Phone:** 509-533-2831

**Fax:** 509-533-2825

**Emergency:** 800-447-8066

**Unit Description:**

The Wallula District extends from the Snake River to the Washington/Oregon state line. The looped 24" and 36" lines are approximately 55 miles in length, transverse mostly agricultural wheat fields, and have a MAOP of 911 psig at approximately 72% SMYS. There are no laterals and HCAs in the District.

**Facilities Inspected:**

A review of operations and maintenance records was conducted at the Spokane, WA office. Field inspection included the Starbuck and Wallula Compressor Stations, block valves 7-1 and 7-2, pipeline right-of-way, rectifiers, and numerous cathodic protection pipe-to-soil test sites.

The compressor stations building-C were off-line for the gas and fire detectors test to verify ventilation fans and the ESD systems were activated. The block valves were manually and gas operated. The testing of the block valves and compressor stations operated as designed. Seventy (70) circuits for anode beds along the pipeline and at compressor stations were checked for output voltage and amperage.

**Persons Interviewed:**

Kurt Smith	Compliance Specialist, GTN Systems
Neil Isley	Multi-Skilled Technician-Mechanical
Brett Huntley	Multi-Skilled Technician-Controls
Vivian Smith	Geotechnical Program Manager, Pipe Integrity

**Probable Violations/Concerns:****Three probable violations were identified.**

- 1) The anode beds placed along the pipelines were not energized during the 2008 and 2010 inspections. During the inspections, zero amperes were measured at circuits #75 and #78. The power supply for the circuits is located at the Greenville Road Rectifier (MP 229.9). See Field Data log for 2008 and 2010 for more details. GTN did not take prompt remedial action (192.465) to correct the deficient monitoring of cathodic protection (192.463).
- 2) GTN's Public Awareness Program includes a letter to first responders that is misleading about the natural gas in their pipelines. The letter is dated March 2009 states, "Mercaptan is also added for Odorization." The letter needs to be corrected to reflect that transmission gas is not odorized. Mercaptan is not unique attribute and characteristic of GTN's pipeline (192.616(b)). See Exhibit "A" TransCanada letter to emergency responders.
- 3) Soil subsidence:  
A section of the pipeline located in a ravine near Wallula has soil erosion along the pipeline. I met Ms. Vivian Smith, TransCanada Geotechnical Program Manager for Pipe Integrity during the IMP inspection in Calgary and discussed GTN mitigation plans. Ms. Smith indicated that some type of erosion barrier is proposed, possibly in 2011, to prevent soil displacement along the pipeline. The ravine is shallow with a slope varying from about 3% to 7% with an elevation change of about 150 feet. There are several large sink holes along the pipeline where soil has been washed out, transported along the pipeline trench, and deposited somewhere at a lower elevation. The location where the soil was deposited has not been identified. The largest hole is approximately 12 feet in length, 4 feet wide, and 4 feet in depth. It is my understanding that the sink holes were discovered by the farmer when the field was planted in wheat and the mitigation plans are long overdue pursuant to 192.317(a). The forecast for this coming winter is heavier than normal rain fall. The erosion is at Milepost 231.5 and approximately 0.5 mile upstream of the crossing of Walker Road in Walla Walla County. The tenant farming the property is Mr. Barry Chabre.

**Follow up on the history of prior offenses that are still open:**

<b>Prior Offenses</b> (for the past 5 years)		
<b>CPF #</b>	<b>What type of open enforcement action(s)?</b>	<b>Status of the regulations(s) violated (Reoccurrence Offenses, Implement a NOA Revision, Completion of PCO or CO, and etc...)</b>

**Recommendations:**

- 1) Issue Notice of Probable Violation for GTN to remediate the anode beds at circuits #75 and #78 located at the Greenville Road Rectifier (MP 229.9).
- 2) Correct the information GTN provides to emergency responders stating, "Mercaptan is also added for Odorization." GTN's transmission lines are not odorized with mercaptan.
- 3) Require GTN to complete geotechnical survey to evaluate soil stability along the pipeline near Wallula and provide an immediate and long term remediation plans.

**Comments:**

Maintain regular inspection schedule and UTC inspect mitigate for soil erosion on pipeline near Wallula.

**Attachments:**

- PHMSA Form 1A-Abbreviated Form 1-Standard Gas Transmission Inspection Form
- PHMSA Form 13 Drug & Alcohol Questions
- PHMSA Form 15 OQ Field Inspection Protocol Form
- PHMSA Form 17 Supplemental SCC Questionnaire
- Field Data Collection Form for 2010.
- Western Region Unit Information Form.
- Pipeline Safety Violation Report
- Exhibit "A" is a copy of GTN's letter to emergency responder along their pipelines.
- Exhibit "B" is a copy of 2008 Field Data Collection.
- Exhibit "C" is a copy of 2010 Field Data Collection.

Version Date: 5/5/08