

I would like to take time out to thank the Commission for all their work and time to go over these comments.

Docket No.TO-000712

PROPOSED DRAFT REPORTING REQUIREMENTS

WAC 480-75-036 Maps, drawings, and records of hazardous liquid facilities.

All petroleum pipeline companies must prepare, maintain, and provide to the commission, upon request, copies of maps, drawings, and records that pertain to pipeline safety issues for a company's hazardous liquid facilities. The maps, drawings, and records must be of sufficient scale and detail as is necessary to show the size and type of material of all facilities.

**This I'm sorry should be done not upon request but should be public record and kept current for all parties of record. Why isn't this being done now? I find it very dishearten that local agencies do not even have this information or know what the Federal standards are when allowing new development to go in where there is a pipeline in the area. When developers are allowed to submit plans for a development that show home being built directly on top of said pipeline, the system is failing us all! What are the easements allowed by federal law? How about a roadway being built directly on top the full length of the pipeline? These should be public records and the Washington Utilities and Transportation Commission should have all of this information on hand! All SEPA for building should also be sent to the WU&TC so they know what is being built in said pipeline areas, do not leave this to the local agencies! I shake when local citizens are just told these are the pipelines to hook up their homes to gas!! This information needs to be put on plat maps on the local levels and a safety plan in place before development occurs!

WAC 480-75-037 Reporting Requirements for proposed construction.

(1) At least 45 days prior to the construction or major reconstruction (or reconditioning) of any hazardous liquid pipeline intended to be operated at 20% or more of the specified minimum yield strength of the pipe used, a report must be filed with the commission setting forth the proposed route and the specifications for such pipeline. The 45-day reporting requirement may be waived in the event of an emergency. The report must include, but not be limited to, the following items:

- (a) Description and purpose of the proposed pipeline.
- (b) Pipe specifications and route map.
- (c) Maximum operating pressure for which the pipeline is being constructed.
- (d) Location and construction details of all river crossings or other unusual construction requirements encountered en route; i.e., places where pipe will be exposed or it is impractical to provide required cover, bridge crossings, lines to be laid parallel to railroads or state highways and encroachments, and other areas requiring special or unusual design and construction considerations.
- (e) Corrosion control plan that includes the specifications for coating and for wrapping.

(f) Welding specifications and welding inspection methods and procedures required during construction of the pipeline. Location of inspection records during and after construction.

(g) Required bending procedures.

(h) Location and specification of all mainline block valves. Indicate whether the valves will be operated by manual or remote control. Indicate other auxiliary equipment to be installed as a part of the pipeline system to be constructed.

(2) For pipelines operating under 20% specified minimum yield strength, companies must submit to the commission a written notice at least 45 days prior to the proposed construction. The notice must include a project description and timeline.

If this isn't being done already than we have a serious problem with the WT&UC and copies need to be sent to the Department of Ecology so they are aware of these for environmental concerns to be addressed. An over all plan needs to be in place for safety of the environment in case of a disaster.

WAC 480-75-038 Pressure testing reporting requirements

If pressure testing is to be used to increase the maximum operating pressure of a pipeline, companies must file a report with the commission at least 45 days prior to the pressure increase stating the change in the maximum operating pressure and the steps required to qualify the pipeline for higher operating pressure.

45 days are not enough and is the Commission going to notify the local areas where this is going to be tested? 60 to 75 days for notification of all parties.

WAC 480-75-039 Incident Reporting

(1) Every hazardous liquid pipeline company must give prompt telephonic notice to the commission, as soon as practicable but not to exceed two hours after the occurrence, of an incident which results in;

(a) A fatality

(b) Personal injury requiring hospitalization;

(c) Spills of 1 gallon of product or more in volume;

(d) Damage to the property of the company and others of a combined total exceeding five thousand dollars (automobile collisions and other equipment accidents not involving hazardous liquid or hazardous liquid handling equipment need not be reported under this rule);

(e) A significant occurrence in the judgment of the company, even though it does not meet the criteria of (a) through (d) of this subsection;

(f) The news media reporting the occurrence, even though it does not meet the criteria of (a) through (e) of this subsection.

(2) Upon request, a report must be sent to the commission within three months of the incident. Such reports must include in writing, if not previously reported, the following:

(a) Name(s) and address/es of any person or persons injured or killed or whose property was damaged;

(b) The extent of injuries and damage;

(c) A description of the incident including date, time, and place;

(d) A description and maximum operating pressure of the hazardous liquid facilities implicated in the incident and the system operating pressure at that time;

(e) The date and time the hazardous liquid facility returns to operating safely; and

(f) The date, time, and type of any temporary or permanent repair.

Time for reporting to the Commission should be 1 month not 3 month, should be done while this information is fresh and can be compiled in a timely manner. A database of information should be kept at the State level and shared with local agencies.

WAC 480-75-040 Depth of Cover Survey

Every five years, depth-of-cover surveys must be conducted in right-of-ways subject to sub soiling.

**Would like to see this a shorter period due to land movement in certain areas and should be tied into the GMA information on local levels. Does the Washington Utilities and Transportation Commission have access to all the GMA information and know where the unstable land is located in WA state? Especial when the local agencies are having problems with storm water erosion in certain areas that are causing slide to happen with in feet of said pipelines? The Felida area in Clark County is one example.

WAC 480-75-041 (010) Annual reports.

(1) The annual report form No. 6 promulgated by the Federal Energy Regulatory Commission is hereby adopted for all hazardous liquid pipeline companies. At the close of each calendar year every hazardous liquid pipeline company must secure from the commission two copies of the annual report forms. The annual report must be completed for the calendar year's operations. One completed copy of the annual report must be submitted to the commission no later than May 1 of the succeeding year. The company must retain the second completed copy.

(3) In addition to form No. 6, pipeline operators must complete the Annual Report form prescribed by the commission. This report must be submitted to the commission no later than April 1 of the succeeding year.

**This information should be shared with the Federal Agency and this should be looked at as a model for other states to follow!

WAC 480-75-042 Operations safety plan requirements

(1) Each operator must prepare an operations safety plan (Plan) that demonstrates the pipeline system is designed, constructed, operated, and periodically modified to provide for protection of the public and the environment. Facility operations must follow the Plan. The Plan must be thorough and contain enough information, analysis and supporting

documentation to demonstrate the company's ability to meet the requirements of this chapter. The Plan may be incorporated into a company's existing operation, maintenance, or emergency plan as required by Title 49 CFR 195.402.

(2) A log sheet must be included in the Plan to record amendments. The log sheet must include the date the old section was eliminated; any new sections that were added; the date; the initials of the individual making the change; and the signature of the person responsible for reviewing the amendment. A description of the amendment(s) and its purpose must be included.

(a) At a minimum, the Plan must include the following:

- (i) The requirements in chapter 480-75 WAC,
- (ii) A schedule of inspection and testing of all the mechanical components and electronic components within the pipeline system,
- (iii) Structural integrity of all pipelines determined through pressure testing, in-line inspection surveys, or other appropriate techniques,
- (iv) Failsafe systems including emergency shutdown and isolation procedures,
- (v) Emergency management training for operators,
- (vi) Procedures for responding to earthquakes that must include threshold for line shutoff, and procedures for integrity monitoring prior to restart,
- (vii) Procedure for assessing the potential for impacts on the pipeline system due to landslides. Operators with facilities located within potential landslide areas must develop monitoring and remediation procedures for ensuring that pipeline integrity is maintained at these areas,

(3) Hazardous liquid pipeline companies must submit a Plan to the commission within 12 months after the adoption date of this rule. New pipeline operators must submit a Plan to the commission no later than sixty days (60) prior to startup.

The Plan must be submitted to:

Washington Utilities and Transportation Commission
Pipeline Safety Division
P.O. Box 47250
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-7250

**Wait a minute, they can go a whole year after adoption, then why are we doing this? These pipelines have now failed over 9 times in our state alone and something needs to be done in a timely manner not a year or two from adoption. Information needs to be shared on the local levels and not just with the Commission! 3months from adoption is not asking too much if we are seriously looking out for the best interest of the Public! Again the WU&TC and pipeline companies also should be aware to ensure proper development and pipeline safety, in doing so should review the SEPA on the local level when it comes in line with living with these pipelines in our communities. General sharing of pipeline information with all parties of record on the

state and local levels, a better education of the public as to where these pipelines are located. Keeping these pipelines a secret benefits not one! An overall safety of the public should be the top priority for all. Working together as a team or partnership!

(4) Amendments to the Plan must be submitted to the commission within five days of the change.

(5) Plans are subject to the commission's review. A Plan is deemed fit for service when it provides for pipelines that are designed, developed, constructed, operated and periodically modified to provide for public safety and protection of the environment.

(6) The commission may require that a Plan be modified whenever it is determined that the pipeline does not meet the requirements of this chapter, or the pipeline is not designed, constructed, operated and periodically modified to provide for public safety and protection of the environment.

(7) The operator must ensure that appropriate personnel are trained and familiar with the Plan's content.

(8) Plans must be evaluated annually and resubmitted to the commission every five years

**If said plans are evaluated annually than they should be submitted annually to the Commission and not every 5 years. An educated annual Commission will benefit the Public than one that sees the changes every 5 years. Then we must ask if this Commission will be cut due to budget cuts. We need to seriously look at the overall big picture when we look at regulations and make sure all parties of record come to the table.

Please excuse some of the changes to this draft, as there was many errors found both grammar and appearance wise in this draft form.

** In Red are my comments, I hope this shows the color for you. Other changes were also made to the original text for reading proposes. I did not use the underline of strike out method when preparing my comments.

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