



Georgia-Pacific

CONSUMER PRODUCTS (CAMAS) LLC

401 NE Adams Street, Camas, WA 98607

Telephone: (360) 834-3021

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

October 21, 2011

David D. Lykken
Pipeline Safety Director
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive, S.W.
P.O. Box 47250
Olympia, Washington 98504-7250

RE: Docket No. -PG-110017

Dear Director Lykken:

The Washington Utilities and Transportation Commission (UTC or Commission) conducted a six (6) day pipeline safety inspection of our facility in July of this year. On September 20, 2011, the Commission issued a notice of probable violation as a result of that inspection, requesting a response by October 21, 2011. This letter and its attachments constitute our response.

As you know, the Georgia Pacific Camas Mill (GP or the Mill) is in the principal business of manufacturing specialty paper products. A portion of our energy needs is delivered by a 1.7 mile long natural gas pipeline, which is owned by GP. The pipeline was constructed in 1992 - 1993, ten (10) inches in diameter with a nominal wall thickness of .307 (thicker wall in some locations). The pipeline as constructed is capable of operating at a maximum allowable operating pressure (MAOP) of 800 psig, but as used -- and per agreement with the UTC -- it is in fact operated at a maximum operating pressure of only 250 psig. This pipeline originates from the Williams Company interstate transmission pipeline, and the Commission classifies the GP stub as an intrastate transmission line.

Although GP is in the paper products business and not principally involved in pipeline operations, we take public safety and pipeline safety very seriously. We have a full time employee who is responsible for management of pipeline oversight, and he is assisted by an experienced contract pipeline engineer who has worked with this system since it was constructed. We have retained additional expertise after receiving this most recent notice, in order to ensure that we are being as responsive as possible to the Commission's concerns.

RECEIVED
REGISTRATION
2011 OCT 21 PM 2:59
STATION

Response to Alleged Violations

The September 20, 2011, notice alleged thirty three (33) probable violations of either State or federal pipeline safety law. Virtually all of the alleged violations involve procedures or documentation, rather than any physical problems with the pipeline system itself. We understand that the procedures and documentation issues raised in the notice are elements of the law, and we do not mean to diminish their importance to pipeline safety management. We do want to emphasize, however, that none of the 33 alleged violations present any direct public safety issues, or suggest any concerns with the integrity of this pipeline as constructed or operated.¹

More than half (18) of these 33 alleged probable violations relate to a pipeline relocation project conducted in 2010, pursuant to the request of the Washington Department of Transportation (WDOT), associated with the widening of State Highway 14 near Camas (Items 2, 3, 6 - 8, 14 - 18, 24, 25, 28 - 33). A total of fifteen (15) alleged violations involve recordkeeping (Items 1, 3, 4, 7 - 9, 11 - 13, 17, 18, 23, 31 - 33), eight (8) of which were associated with the Highway 14 relocation project. The remaining eight (8) probable violations -- not associated with the Highway 14 relocation project or recordkeeping -- involve inspections, written procedures or public awareness programs (Items 5, 10, 19 - 22, 26, 27).

As summarized below, and as shown in the attachments to this response, we believe that most of the 33 alleged probable violations should be resolved with this response, but we acknowledge that some of the alleged probable violations may require further action. Specifically, we agree to conduct a comprehensive review and revision of: (1) our records practices; (2) our plans and procedures practices (including our O&M Manual as required under Part 192, Subpart L, and our OQ procedures as required under Part 192, Subpart N); and (3) the Part 199 (drug and alcohol testing) requirements. We have already made some changes in all of these programs, in response to the Commission's notice, but we recognize the benefit in making a more holistic review. We are seeking additional help to conduct those reviews, and we propose to have them completed in roughly 3 months (by the end of January, 2012). GP is committed to demonstrating to the UTC that all of the alleged probable violations have been addressed, either as demonstrated in this response or through ongoing action, and that the Mill is re-doubling its efforts to demonstrate compliance with all requirements of applicable pipeline safety law.

¹ Although we recognize that the Commission's September 20, 2011, notice does not constitute a formal request for penalty or other action, please note that GP denies the suggestions in several allegations that the Mill 'failed' to take action under various requirements. As shown by this response, GP desires to cooperate with the UTC and address the Commission's concerns to the extent possible. Despite our cooperative response, however, and unless otherwise stated expressly in this response, we deny any and all allegations that we were not in compliance with applicable law.

The Highway 14 Line Relocation Project

At the request of WDOT, in 2010 GP agreed to move its pipeline for road construction associated with the widening of Highway 14. The relocation project involved 336 feet of the pipeline. As part of the project, we installed new, thick walled pipe.

The threshold alleged probable violations associated with this project were that: (1) GP failed to provide a timely notice of commencement to the Commission as required by State law (Item 6); and (2) that the project as constructed did not comply with our own written procedures (Items 2 and 14). As to Item 6, we acknowledge that although the Mill did submit notice of this project to UTC, we inadvertently missed the 45 day advance deadline for that submission. The WDOT changed its construction plans just before the notice was to go in, and in the course of making necessary revisions to our own relocation plans we unfortunately submitted the formal notice late. It is our understanding that UTC was aware of this project already, however, and there is no suggestion in the UTC notice that our late submittal had any effect on project safety or compliance.

As to Items 2 and 14, the UTC notice of probable violation alleges that GP's construction plans specified use of Y-42 fittings and X-42 rated pipe for the relocation, but that GP's procedures specify Y-52 fittings and that X-42 pipe was actually used. As shown in Attachments 3 and 4, the pipe and associated fittings used were in fact rated "X52/42", thus properly rated pipe and fittings were in fact used as specified, although that fact may not have been evident in the records reviewed during the inspection, without more discussion. Item 14 alleges that GP did not properly follow the pressure formula set forth at 49 C.F.R. Part 192.105 for the new pipe. We respectfully submit that we did follow that formula, although the worksheet reviewed during the audit may not have been clear. A more complete worksheet is included at Attachment 15. It should be noted that this line is operated at only 10% of the sustained minimum yield strength (SMYS) for this pipe, thus there should be no question that the pipe is operated well within the most conservative margins of safety established by law.

Other non-recordkeeping alleged probable violations associated with the 2010 line relocation project include written procedure and/or operator qualification (OQ) regulations for the welding contractors involved in construction (Items 15, 16, 24). It appears that only the first page of our welding procedure was reviewed during the audit (a complete copy is included at Attachment 32). Additional documentation of the OQ documentation for welders is included at Attachments 5 and 6). We respectfully submit that these allegations should be resolved and closed by virtue of this response.

Recordkeeping Allegations

Nearly half of the alleged violations included in UTC's September 20, 2011, Notice concerned recordkeeping issues. Additional records are included in the attachments to this letter, cross referenced to numbered Items in the Notice. Other records will be reviewed and revised as part of our ongoing efforts over the next 3 months. None of the recordkeeping issues alleged go to

any issue of public safety, and all alleged violations have either already been addressed or will be as part of our larger review (as shown in the attached Tables). We respectfully request that these items be considered closed.

Other Allegations

Other allegations presented in the UTC's September 20, 2011, notice have either already been addressed as of the date of this letter, or are subject to our larger review commitment (see attached Tables). As noted above, GP submits that none of these issues presented any pipeline safety concerns, but the Commission's concerns have been addressed in any event. We respectfully request that these items be considered closed.

Areas of Concern

The Commission's September 20, 2011, notice also identified twelve (12) Areas of Concern (AOCs). These AOCs were not alleged as probable violations, but did request response by GP. The Mill's reply to each of these AOCs is set forth in the final attachment to this letter. We respectfully request that these items be considered closed.

GP's Commitment to Pipeline Safety and Corrective Action

As stated above, we believe that GP's 1.7 mile long natural gas pipeline is in good condition and is operating within very conservative parameters, commensurate with applicable law and pipeline safety considerations. The UTC notice does not suggest otherwise. We respectfully submit that the majority of the 33 alleged probable violations in the notice should be resolved with this response. We are continuing to address the Commission's concerns by undertaking a comprehensive review of our records, plans and procedures (O&M and OQ), and Part 199 obligations. We intend to complete our review and revision of those items over the next 3 months (by the end of January, 2012). Also as noted above, many changes have already been made to these three areas, but we agree that a comprehensive review would be prudent.

The first attachment to this letter (Table 1) summarizes those Items that should be resolved by this response. The second attachment (Table 2), shows those actions GP has underway to address any remaining concerns identified by UTC in its September 20, 2011, notice. We will advise the Commission in the first week of January 2012 of our status on these efforts, and we expect to provide notice of completion of those actions no later than January 31, 2012.

We would appreciate the opportunity to meet with UTC representatives upon the Commission's receipt of this response, so that we best ensure that any corrective actions we are taking are consistent with the Commission's expectations.

Summary

GP believes that the 1.7 mile long intrastate transmission natural gas pipeline that it owns, which serves GP's Camas Mill, is well constructed, inspected and maintained, and that it poses no threat to public safety. Nothing in the Commission's September 20, 2011, notice of probable violation suggests otherwise. Of the 33 alleged probable violations set forth in that notice, we believe the majority should be considered resolved with this response, for the reasons set forth in this letter and its attachments. The Mill is continuing to address the Commission's concerns by undertaking a more comprehensive review of several programs. We respectfully submit that none of the allegations rise to the level of a serious violation, if any violation at all. We hope this response, and our commitment to undertake additional action over the next 3 months, demonstrates our commitment to addressing and/or correcting any and all such alleged violations as expeditiously as possible.

With this submittal, and our commitment to take corrective action where necessary, we believe that all of the issues raised by UTC following last summer's inspection have already been addressed or are in the process of being addressed. We will submit additional written documentation to the Commission upon completion of our corrective actions.

We request the opportunity to meet with representatives of the Commission after it has reviewed this response, in order to ensure that we have or are addressing all concerns expressed in the September 20, 2011, notice. To the extent that the Commission believes any further enforcement or administrative penalty is warranted, we respectfully request a hearing on such action.

If you have any questions about this response, please do not hesitate to contact Steve Ringquist, at 360-834-8166 or steve.ringquist@gapac.com. Thank you.

Sincerely,



Gary W. Kaiser
Vice President

GWK/jm

Pursuant to WAC 480-07-160, attachment(s) 37, 39 and 40 are designated as confidential to protect individual privacy.

Enclosures

cc:

Steve Ringquist - GP/Camas
Roy Rogers - CPE/West Linn
Thomas O'Conner, Esq.
Robert Hogfoss, Esq.
Craig Trummel, Esq.

Georgia Pacific - Camas Facility
July 2011 Natural Gas Pipeline Safety Inspection
WACU Docket PG-110017

RESOLVED ALLEGED VIOLATIONS

Item No.	Probable Violation Topic/Sub-Item	Explanation/Resolution¹
1	Odorization of Gas	The equipment was sent in for annual calibration, and the calibration records are in Attachment 1 to this response. In addition, the O&M Manual has been updated to clarify these obligations; see Section 3.1.2 at Attachment 2 to this response.
2	Filing requirements for design/specifications	GP installed dual grade pipe equivalent to the O&M requirements. Attachments 3 and 4 show dual grade pipe 42/52 was delivered and installed. GP has also updated its O&M Manual for clarification; see Section 4.6 of Attachment 2.
3	Records	
	3.1	GP submits Attachment 5 as evidence of Alaska Continental Pipeline compliance with WAC 480-93-018.
	3.2	GP submits Attachments 6 and 7 as evidence of Oregon Washington Lab (OWL) compliance with WAC 480-93-018.
	3.3	GP submits updated as-built records at Attachment 8 that are consistent with the construction records.
	3.4	GP submits confirmatory jeeping records at Attachments 9, 10 and 11 to this response.
	3.5	Annual reports for 2008-2010 are included as Attachments 12, 13 and 14 to this response.
	3.6	An amended design document is included at Attachment 15 to this response.
	3.7	A public liaison contact listing is included as Attachment 16.
	3.8	Public Awareness plan; see Response to Probable Violation No. 23 and f.n. 1.
	3.9	An updated HCA map is included at Attachment 17.
	3.10	See response to Item 1 above regarding odorometer calibration.
	3.11	Valve inspection forms are included at Attachment 18 to this response.
4	Corrosion Control Records	
	4.1	GP's CE maintains one meter for corrosion control. The calibration records for 2008, 2009, 2010 were

¹ Note: any items that are not addressed in this table are anticipated to be addressed through the actions set forth in the "Further Action" table that GP is providing with this response

Item No.	Probable Violation Topic/Sub-Item	Explanation/Resolution ¹
		provided to the UTC representative. Those records are included in Attachment 19 to this response, as well as an additional record from 2009 that GP obtained post-inspection.
4.2		The CE uses a new Cu/CuSO4 meter each year, and GP has prepared a revision to the O&M Manual to address this, as reflected at Section 3.3.16 of Attachment 2.
5	Corrosion Control	The fourth support has been inspected and the inspection report is included as Attachment 20 to this response.
6	Construction Reporting	The original construction project involved only a segment of pipeline less than 100 feet, exempt from §480-93-160. Upon collaborative review of the highway project with WASHDOT, GP revised the project to avoid risk to the pipeline from new highway infrastructure and the length increased to over 300 feet. GP provided its Construction Notice Filing on April 6, 2010.
7	Plans and Procedures	
7.2		Documents pertaining to Alaska Pipeline Company, OWL, Roy Rogers and Wolfgang are included at Attachments 21, 22, 23 and 24 to this response.
7.3		
7.5		GP utilized API Standard 1104 (20 th Ed.) in practice, and GP has prepared a revision to its O&M manual at Section 4.7.4 to address this, included in Attachment 2 to this response.
7.9		
7.7		NDT records and data that was provided to the NDT radiographers are included at Attachments 25 and 26.
7.8		
7.11		GP has updated its O&M Manual at Section 3.8.23 to address these issues, included as Attachment 2 to this response.
8	Plans and Procedures	To remedy these items, GP is submitting amended O&M Manual sections 4.8 (test acceptance), 4.16 (minimum depth of cover), 3.4 (pipeline marker), and 3.4 (damage prevention) in Attachment 2 to this response, updated OQ-007 as Attachment 27 and OQ-004 document (coating procedure) as Attachment 28; <i>see also</i> f.n. 1. GP has also revised its IMP procedures, provided as Attachment 30 to this response.
9, 10, 11, 12	Gas Leak	A portion of the pipeline is located in a decommissioned landfill on GP property which produces gas at levels undetectable to CGI. To address issues raised in these Probable Violations, GP will be further amending the O&M Manual (<i>see</i> f.n. 1). Additionally, while GP did not attach a map to the leak survey records, GP stated in its records that it surveyed the entire 1.7 mile pipeline. The map is included as Attachment 31 to this response.
13	Gas Leak Surveys: Self Audits	GP will perform self audits as required and will be further reviewing and updating its O&M Manual to clarify self-audit requirements; <i>see</i> f.n. 1.
14	Pipe Design Formula	The pipe installed has a yield strength of 52,000. GP has amended the values used in the design documents to reflect the stronger materials actually used in the project; <i>see</i> Attachment 15 to this response.
15	Welding Procedure	GP provided the UTC with an incomplete electronic version of the Company's procedure; the hard copy

Item No.	Probable Violation Topic/Sub-Item	Explanation/Resolution
		<p>O&M document WPS GP CAMAS -01 is a signed, approved procedure as reflected at Attachment 32 to this response. All the essential variable information and preheat requirement information is included in this procedure. This procedure was used because the contract welder required a downhill procedure. The procedures in the GP manual are uphill procedures; GP will add a downhill procedure to its O&M manual. See f.n. 1.</p>
16	Welder Qualifications	<p>GP recorded the qualification of welders. and the welder qualified on WP-CAMAS-01 and passed a destructive test; further explanation and welder qualification records are included as Attachment 33.</p>
17	Weld Inspection	<p>GP submits records as Attachment 34 that supports that R.L.D. visually inspected the welds and is qualified to do so.</p>
18	Safety while testing	<p>The pipe installed has a yield strength of 52,000 psi (not 42,000 psi) which results in the hydrostatic test falling with the appropriate parameters (and not exceeding 50% SMYS).</p>
19	Update of O&M manual	<p>GP will review and update its manual as required in 2011, and has included a revised O&M procedure 3.8.23 at Attachment 2 regarding manual update obligations; see also f.n. 1.</p>
20 and 21	Damage Prevention Program	<p>GP is exempt from these obligations under Part 192.614(e) because GP is not in the primary business of transporting natural gas. GP has nonetheless opted to replace the one comprehensive list with the two lists requested by UTC which are included as Attachment 35 to this response.</p>
22	Emergency Plans	<p>GP will add a contact record form to its O&M Manual as part of its overall review; see f.n. 1.</p>
23	Public Awareness	<p>The PA mailing form is included as Attachment 36 to this response. Additionally, GP will review and update its O&M manual to more clearly conform with Part 192 obligations and to include new forms to document the campaign; see f.n. 1.</p>
25	Recordkeeping	<p>GP updated the operator compliance records, and the updated records are included as Attachments 37 and 38 to this response.</p>
26	HCA Identification	<p>The pipeline was moved 7 feet to the north, although the conventional mapping scale at 1":100' is unable to display the 7 foot change at a level that is perceptible to the human eye. GP conferred with National Pipeline Mapping System, who confirmed that their system cannot reflect such a small change. The map is resubmitted as Attachment 17 to this response.</p>
27	Risk/Preventative Measures	<p>Williams Pipeline has operational control over the flow of gas through the GP pipeline. The automatic shut off valves operated by Williams Pipeline were disconnected due to continuing malfunctions. GP has evaluated the risk and its response efficiency, and post-inspection confirm its response time as 3 minutes, 40 seconds.</p>
30	Contractor Employees - Drug Testing, Education and Training	<p>To address these issues, included as Attachments 39 and 40 are Alaska Continental's and OWL's, respectively, drug and alcohol testing records.</p>

Item No.	Probable Violation Topic/Sub-Item	Explanation/Resolution
33	Contractor Employees - Alcohol Testing, Training and Education	To address these issues, included as Attachments 39 and 40 are Alaska Continental's and OWL's, respectively, drug and alcohol testing records

Georgia Pacific - Camas Facility
July 2011 Natural Gas Pipeline Safety Inspection
WACU Docket PG-110017

ITEMS SCHEDULED FOR FURTHER ACTION

Item No.	Probable Violation Topic	Description	Target Completion Date
3	Records/Recordkeeping	GP will review and revise its records practices regarding creation and maintenance of records to address UTC's findings underlying Probable Violation Item 3	January 31, 2012
7, 24	Plans and Procedures: 49 CFR Subparts L (O&M) and Subpart N (OQ)	In response to issues raised in the September 20 th notice from the UTC as to differences between the Company's manuals and practices, GP will undertake a comprehensive review of its O&M Manual in compliance with Subpart L of 49 CFR Part 192 and its OQ Program in compliance with Subpart N of 49 CFR Part 192	January 31, 2012
28, 29, 30, 31, 32, 33	Part 199 Program	GP will review and revise its procedures and practices for purposes of complying with 49 C.F.R. Part 199 obligations (including drug tests, EAP, contractor employees, record retention and supervisor training)	January 31, 2012

**Georgia Pacific - Camas Facility
July 2011 Natural Gas Pipeline Safety Inspection
WACU Docket PG-110017**

RESPONSES TO AREAS OF CONCERN

1. Finding: WAC 480-93-018 Records.

GP leak survey records lack attention to accuracy/detail. Example: 2010 Annual Pipeline Leakage Inspection correspondence with GP is dated October 2, 2010, but describes the survey completion on October 16, 2010, with an attached FI calibration record dated October 11, 2010.

GP Response:

As reflected elsewhere in this response, Georgia Pacific intends to do a thorough review of recordkeeping procedures and expectations in order to identify areas for improvement, with a proposed completion date of January 31, 2012.

2. Finding: WAC 480-93-110 Corrosion Control.

GP Procedure 3.3.9 Remedial Action states that GP will make arrangements to correct the problem within 90 days. This procedure should be corrected to state remedial action shall be completed within 90 days.

GP Response:

Georgia Pacific has revised section 3.3.9 of the Operation, Maintenance and Procedures manual to state "Remedial action shall be completed within 90 days," as reflected in Attachment 2 to this response.

3. Finding: WAC 480-93-180 Plans and procedures

GP does not have detailed procedures for the acceptance/review and monitoring of hydrostatic tests.

GP Response:

GP has addressed this by adding language to O&M Manual section 4.8(1) Pressure Testing, reflected in Attachment 2 to this response.

4. **Finding: WAC 480-93-180 Plans and procedures**

GP's Public Awareness Procedures Sections 2.1, 2.2, and 2.3 incorrectly references Section 3.4 Pipeline Marking Plan rather than the intended Section 2.4 Safety Considerations.

GP Response:

GP has revised the Public Awareness Plan document. Sections 2.1 and 2.3 now reference O&M manual section 3.7 Damage Prevention as intended; Section 2.2 now correctly references section 2.3 Mill Response to Emergencies as intended.

5. **Finding: WAC 480-93-185 Gas leak investigation.**

Correct GP Procedure 3.2.3 to include the "property owner or adult occupant" language in accordance with this rule.

GP Response:

GP has changed Procedure 3.2.3 regarding notification so that notice will be provided to "property owner or adult occupant," as reflected in Attachment 2 to this response.

6. **Finding: 49 CFR §199.3 Definitions**

GP's definition for "Operator" is incomplete under this regulation. Operator definition shall read as defined under this regulation: "Operator means a person who owns or operates pipeline facilities subject to part 192, 193, or 195 of this chapter."

GP Response:

The Company will change its definition in both the "Alcohol Misuse Prevention Plan" (page 8) and the "Anti-Drug Plan" (page 9) from their current statement of "Operator – is defined as an owner or operator of pipeline facilities" to read "Operator means a person who owns or operates pipeline facilities subject to part 192, 193, or 195 of 49 CFR". Additionally, and as reflected elsewhere in this response, Georgia Pacific intends to do a thorough review of its 49 CFR Part 199 obligations, with a proposed completion date of January 31, 2012.

7. **Finding: 49 CFR §192.105 Design formula for steel pipe.**

Records show that GP failed to design for their transmission pipeline until after they completed pipeline construction on 04.14.10. (Note: this is the same day (04.14.10) GP began their hydrostatic test on the pipeline.)

GP Response:

Georgia Pacific updated the design document to reflect the actual length of the pipeline fabrication and the revised material grade; *see* Attachment 15 to this response. We believe this action was technically responsible given the scrutiny of hydrostatic testing by regulatory agencies.

8. **Finding: 49 CFR §192.225 Welding Procedures.**

Section IX of ASME (July 2007) requires Qualified Welding Procedures to be updated (without requiring re-qualification of the procedure) to reflect change in ownership and acceptance of the procedure. GP procedures identify James River Corp. as the company name.

GP Response:

Georgia Pacific will revise the weld procedure to reflect Georgia Pacific in lieu of James River. GP is investigating the proper method to accomplish this and will notify the Commission when this is complete.

9. **Finding: 49 CFR §192.229 Limitations on welders.**

GP has not consistently re-qualified their own welders without exceeding the regulation mandated 6 calendar month time requirement. However, staff found no indication that GP employees welded on the pipeline.

GP Response:

Georgia Pacific will address the Commission's concerns by scheduling this work well in advance of the 6 month time requirement to allow adequate time for the welders to complete this compliance task. GP will also elevate the priority of this task within our scheduling system.

10. **Finding: 49 CFR §199.101 Anti-drug plan**

GP failed to post their Alcohol Misuse and Anti-drug Plans in the manner identified in the plans. GP states the plans shall be posted, in their entirety, on various work location bulletin boards. GP identified that they will revise this language by removing the requirement to post the entire plan on bulletin boards. GP shall identify the exact location where their plans are displayed, notify all covered employees of this location and ensure that the location is accessible to these employees.

GP Response:

Concerning its "Procedure for Notifying Employees" found on page 19 of the Anti-Drug Plan Paragraph III, A, 2, the Company will modify the language to read "Employees covered by this plan shall be advised that the plan may be accessed either on the Camas Mill Maintenance Department web page under Natural Gas Pipeline or a hard copy may be viewed at the clock room office. All covered employees will be provided a complete copy of the anti-drug plan upon request." Additionally, and as reflected elsewhere in this response, Georgia Pacific intends to do a thorough review of its 49 CFR Part 199 obligations, with a proposed completion date of January 31, 2012.

11. Finding: 49 CFR §199.202 Alcohol misuse plan

GP's Alcohol Misuse Prevention Plan IV(A)(1) Alcohol Tests Required - Pre-Employment Plan mimics the regulation. GP should correct their Plan by specifically identifying the optional pre-employment requirements they will apply under this regulation.

GP Response:

Georgia Pacific will modify their Alcohol Plan to conduct pre-employment alcohol testing under 49 CFR Part 199 as follows:

- a. The Company will conduct a pre-employment alcohol test before the first performance of covered functions by every covered employee (whether a new employee or someone who has transferred to a position involving the performance of covered functions);
- b. The Company will treat all employees the same for the purpose of pre-employment alcohol testing (i.e., company must not test some covered employees and not others);
- c. The Company will conduct pre-employment tests after making a contingent offer of employment or transfer, subject to the employee passing the pre-employment alcohol test;
- d. The Company will conduct all pre-employment alcohol tests using the alcohol testing procedures in the DOT procedures in 49 CFR Part 40; and
- e. The Company will not allow any covered employee to begin performing covered functions unless the result of the employee's test indicates an alcohol concentration of less than 0.04."

Additionally, and as reflected elsewhere in this response, Georgia Pacific intends to do a thorough review of its 49 CFR Part 199 obligations, with a proposed completion date of January 31, 2012.

12. Finding: WAC 480-93-110 Corrosion control.

Each gas pipeline company must have a written atmospheric corrosion control monitoring program. The program must have time frames for completing remedial action.

GP Response:

Georgia Pacific believes that Section 3.3.6.4 satisfies most if not all of the procedural requirements for atmospheric corrosion monitoring and remediation. We nonetheless intend to review and improve the O&M manual with regard to corrosion control, as part of the larger review that GP proposes to conduct by January 31, 2012.

**Georgia Pacific - Camas Facility
July 2011 Natural Gas Pipeline Safety Inspection
WACU Docket PG-110017**

INDEX OF ATTACHMENTS

Tab No.	Description of Reference Document	Responsive to Probable Violation(s)/Item Nos.
1.	Odorizer calibration for 2009 (actual Jan 2010) with return documentation	1
2.	O&M Manual Revisions	1; 2; 4; 7.5; 7.9;7.11; 8.3; 8.4; 8.8; 8.9; 8.10; 8.12; 16; 21
3.	Material certification sheet for pipe and fittings	2; 3.6.b
4.	Photo: Pipe Stencil Data	2
5.	Alaska Continental OQ Procedures	3.1
6.	Oregon Washington Labs (OWL) OQ Procedure	3.2
7.	OWL Radiograph Examination Procedure	3.2
8.	Updated "as built" records for project	3.3
9.	Jeep unit record of calibration	3.4
10.	April 9, 2010 photo: pipe with coating defect circled	3.4; 8.2
11.	Correspondence with UTC regarding jeeping activity on April 15, 2010	3.4
12.	2008 Annual report	3.5
13.	2009 Annual report	3.5
14.	2010 Annual report (not due or submitted at time of audit)	3.5
15.	Amended design document	3.6.a; 14
16.	Public Liaison contact listing	3.7
17.	Updated HCA Map (with revision date)	3.9
18.	Valve inspection forms	3.11
19.	Multi-meter calibration records 2009, 2010, and 2011	4.1
20.	Pipe support inspection	5
21.	Drug & Alcohol Pre-Employment Plan Review (Alaska Continental Pipeline Co. d/b/a Rockford Corporation)	7.2.a
22.	Drug & Alcohol Pre-Employment Plan Review (OWL)	7.2.b
23.	Drug & Alcohol Pre-Employment Plan Review (Roy Rogers; from NW Natural)	7.2.d; 30.3; 33.3
24.	Drug & Alcohol (Wolfgang Associates Inc.)	7.2; 7.3
25.	NDT records	7.7
26.	GP explanation regarding data furnished to NDT radiographers (including pipe wall thickness)	7.8
27.	Updated OQ-007 with explicit reference to PLIDCO OEM	8.1

Tab No.	Description of Reference Document	Responsive to Probable Violation(s)/Item Nos.
	instructions	
28.	Updated OQ-004 regarding coating procedure	8.2
29.	GP explanation and existing O&M Manual procedure Section 3, Appendix B	8.8
30.	GP proposed revision to IM Plan regarding remote actuation valves	8.13; 26; 27.4
31.	Leak Survey Map	12
32.	GP Camas-01 weld procedure	15
33.	Explanation and Welder Qualification Record	16
34.	RLD Qualifications Statement, Resume and Certifications	17
35.	List of Excavators	20
36.	Copy of current PA mailing	23.1
37.	OWL OQ by Employee Listing	25.2
38.	OQ qualification records for RLD	25.3
39.	Alaska Continental Pre-Employment Drug Testing	30.1; 33.1
40.	OWL Drug Testing Listing (current)	30.2; 33.2