

Woodard, Marina (UTC)

From: Lykken, David (UTC)
Sent: Tuesday, January 12, 2010 11:51 AM
To: Zuehlke, Stephanie (UTC); Woodard, Marina (UTC)
Subject: FW: PG 090002 Cascade Response
Attachments: PG 090002 Response.pdf

Paper copy to follow in the mail

Dave

From: Meissner, Keith [mailto:Keith.Meissner@cngc.com]
Sent: Tuesday, January 12, 2010 9:59 AM
To: Lykken, David (UTC)
Cc: Marek, Chanda; BOOK, ELDON; Kelln, Rick; CLARK, TIM; Grunhurd, Dave
Subject: PG 090002 Cascade Response

Attached is a scan of the response letter.
Thank you again for giving us the extra week to complete this.

The originals, supporting documents, and photos are in the mail today and should reach your office by tomorrow.

Keith A. Meissner, PE
Manager, Safety and Compliance
Cascade Natural Gas Corporation
(206) 381-6734



222 FAIRVIEW AVENUE N., SEATTLE, WASHINGTON 98109-5012 206-624-3900
FACSIMILE 206-654-4039

January 8, 2009

David Lykken
Washington Utilities and Transportation Commission
P.O. Box 47250
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504

Subject: Docket PG-090002 - 2009 Natural Gas Standard Inspection – Bellingham District

Dear Mr. Lykken:

Please see our attached response to the subject inspection report of November 3, 2009, regarding the September 2009 inspection of our Bellingham operations.

We look forward to a cooperative approach toward compliance with pipeline safety codes. To that end, Chanda and I would like to meet with you personally to discuss this response and future related action. We intend to bring operational materials for joint review so that we can gain further understanding of your expectations and direct our operations accordingly. We will contact you in the near future to set up a meeting. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Eldon N. Book", written over a horizontal line.

Eldon N. Book
Executive Vice President and Chief Operating Officer
CASCADENATURALGAS CORP.

Cc: Tim Clark
Chanda Marek
Keith Meissner

We make warm neighbors

www.cngc.com

Probable Violation

1. **WAC 480-90-328 Meter identification**

Gas utilities must identify each meter by a unique series of serial numbers, letters, or combination of both, placed in a conspicuous position on the meter, along with the utility's name or initials. Utilities must update the name or initials on its meters within three years of a name change.

Charges(s):

CNG did not identify meters in accordance with this rule.

Finding (s):

CNG did not identify meters in accordance with this rule. Examples follow:

1. *Judson St. Alley S. of Front St. E. of 511 Front St., Lynden (2 meter manifold)*
 - a. *No unique number on either meter*
 - b. *No company identification label on either meter*
2. *Judson St. Alley S. of Front St., Lynden*
 - a. *No unique number on meter with magic marker written 415*
 - b. *No company identification label on meter with magic marker written 415*
3. *Judson St. Alley S. of Front St. Meter W. of Meter #255793, Lynden*
 - a. *No unique number on meter*
 - b. *No company identification label on meter*
4. *Judson St. Alley S. of Front St., Lynden (Remote skew #02 28858387)*
 - a. *No company identification label on meter*
5. *Alley N. of Front St., Lynden (3 meter manifold)*
 - a. *No company identification label on Meter #406262*

Cascade Response

We reviewed each of the locations Staff indicates and found the following:

1. Judson St., Alley s of Front St., e of 511 Front St - Lynden
 - Unique Co #134291/Mfg#1210741 - CNG on Badge
 - Unique Co #127299/Mfg#455399 - no Co. ID
2. Judson St. Alley s of Front St. aka 415 Front - Lynden
 - Unique Co #130255/Mfg.#0884255 - CNG on Badge.
3. Judson St. Alley s of Front, Meter w of #255793 - Lynden
 - Unique Co #165373/Mfg#1495548 - CNG on Badge.

· Unique Co #560455/Mfg#016168 - CNG on Badge.

4. Judson St. Alley s of Front St - Lynden ERT#02 28858387

· Unique Co #160270/Mfg#1126345 - CNG on Badge.

5. Alley N of Front St. - Lynden (3 meter manifold)

· Unique Co #406262/Mfg #5164465-no Co. ID

· Unique Co #253903/Mfg #3549189 - CNG on Badge.

· Unique Co #563126/Mfg #660205 - CNG on Badge.

The deficient meters have been remediated.

Probable Violation

2. **WAC 480-93-186 Leak evaluation**

- (1) *Based on an evaluation of the location and/or magnitude of a leak, the gas pipeline company must assign one of the leak grades defined in WAC 480-93-18601 to establish the leak repair priority. A gas pipeline company may use an alphabetical grade classification, i.e., Grade A for Grade 1, Grade B for Grade 2, and Grade C for Grade 3 if it has historically used such a grading designation. Each gas pipeline company must apply the same criteria used for initial leak grading when reevaluating leaks.*

Charges(s):

CNG did not grade leaks in accordance with the rule.

Finding (s):

Leaks have not been assigned a grade at the scene by personnel completing the leak evaluation. Leaks have been graded by the General Manager (GM). Leak investigation is a covered task; field personnel are not grading their found leaks. The practice of field staff contacting the GM to grade found leaks is inconsistent with this training.

Cascade Response

Staff finds that CNG did not grade leaks in accordance with the rule, but finds that Cascade employees, General Managers, grade the leaks. The rule requires that the "pipeline company must assign one of the leak grades defined in WAC 480-93-18601 to establish the leak repair priority." The rule does not specify which employee, or that only one employee, makes the assignment. We believe that Cascade has complied with the rule.

Currently, Cascade Leak Survey Personnel are instructed after investigation of a leak to contact a General Manager or other assigned Supervisor immediately. At that time, there is a discussion either by phone, or if necessary a field visit with survey personnel on site to review the findings. This is a joint effort between the two parties to make a correct analysis of what would be an appropriate action to take. For leaks that are considered an imminent threat, our employees are trained, qualified, and empowered to take immediate steps to protect life and property without consulting their supervisor.

Probable Violation

3. **WAC 480-93-187 Gas leak records**

Each gas pipeline company must prepare and maintain permanent gas leak records. The leak records must contain sufficient data and information to permit the commission to assess the adequacy of the gas pipeline company's leakage program. Gas leak records must contain, at a minimum, the following information:

- (1) Date and time the leak was detected, investigated, reported, and repaired, and the name of the person conducting the investigation;*
- (2) Location of the leak (sufficiently described to allow ready location by other qualified personnel);*
- (3) Leak grade;*
- (4) Pipeline classification (e.g., distribution, transmission, service);*
- (5) If reported by an outside party, the name and address of the reporting party;*
- (6) Component that leaked (e.g., pipe, tee, flange, valve);*
- (7) Size and material that leaked (e.g., steel, plastic, cast iron);*
- (8) Pipe condition;*
- (9) Type of repair;*
- (10) Leak cause;*
- (11) Date pipe installed (if known);*
- (12) Magnitude and location of CGI readings left; and*
- (13) Unique identification numbers (such as serial numbers) of leak detection equipment.*

Charges(s):

Gas leak records are inadequate in that they do not contain all information required under this rule.

1. **Finding (s):**

CNG gas leak forms/records identify the magnitude of CGI reads as a % only and do not include a unit label. It is unclear whether the % read on the form identified on their records indicates LEL or gas to air.

2. **Finding (s):**

Records indicate that special leak surveys do not contain documentation of all required information. Examples follow:

- a. 08.23.07 Vista/Washington, Ferndale*
- b. 09.14.07 Grover & 1st up Drayton, Lynden*
- c. 09.25.07 Mountain View Rd. & Douglas Rd., Ferndale*

Cascade Response

Finding 3.1

We believe we have complied with the rule. The magnitude and location of each reading is recorded.

Cascade personnel are trained to use the "Search" mode using "%LEL" to detect leaks, and then to report using the "% Gas in Air" setting. We understand Staff's concern that it is difficult for them to determine which magnitude is indicated unless we specify which scale was used. We will train our employees to indicate which scale they are recording.

Finding 3.2

The records specified by Staff are leak surveys performed under WAC 480-93-188(5). Copies of the records are attached and each record is compared to WAC 480-93-188(5) below.

- 8/23/07 Vista & Washington @ Round-a-bout - Ferndale. Generated w/general work order to check area excavated for traffic revision prior to completion.

Description of Area	Documented, but could be better
Survey Results	Not documented. If a leak were detected it would have been documented.
Survey Method	Not documented
Name of person performing survey	Documented
Survey Dates	Documented
Instrument Tracking Number	Not Documented

- 9/14/07 Grover & 1st, up Drayton - Lynden. Generated w/general work order to check area excavated for traffic revision prior to completion w/asphalt.

Description of Area	Documented on maps
Survey Results	Documented. No leaks found
Survey Method	Not Documented
Name of person performing survey	Documented
Survey Dates	Documented
Instrument Tracking Number	Not Documented

- 9/25/07 Mountain View & Douglas Rd - Ferndale. Generated hand written CNG #330 Form completed by employee over traffic revision work after excavation, and prior to completion.

Description of Area	Documented
Survey Results	Not Documented. If a leak were detected it would have been documented.
Survey Method	Documented. "flame pak"
Name of person performing survey	Documented
Survey Dates	Documented

Instrument Tracking Number	Documented
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We find that none of the above records used our CNG Form 286 System Surveillance form. We will instruct employees to document our special leak surveys on the Form 286 so that all the required data is recorded. An example of a survey completed after Staff's inspection is attached.

Probable Violation

4. **WAC 480-93-188(1) Gas leak surveys**

- (1) Each gas pipeline company must perform gas leak surveys using a gas detection instrument covering the following areas and circumstances:
- (a) Over all mains, services, and transmission lines including the testing of the atmosphere near other utility (gas, electric, telephone, sewer, or water) boxes or manholes, and other underground structures;
 - (b) Through cracks in paving and sidewalks;
 - (c) On all above ground piping (may be checked with either a gas detection instrument or with a soap solution);
 - (d) Where a gas service line exists, the gas pipeline company must conduct a leak survey at the building wall at the point of entrance, using a bar hole if necessary; and
 - (e) Within all buildings where gas leakage has been detected at the outside wall, at locations where escaping gas could potentially migrate into and accumulate inside the building.

Charges(s):

Records and documentation do not contain sufficient leak survey information to demonstrate compliance.

1. **Finding (s):**

Leak survey records lack sufficient documentation to verify that leak surveys occurred over the pipeline. Leak surveys have been completed utilizing maps which contain errors. The following services were either 1) mapped but not marked as having been leak surveyed, or 2) not mapped and not marked as having been leak surveyed. Examples follow:

- a. 2007 Leak Survey - Section 6 in Ferndale
- b. 2008 Leak Survey in Lynden
 - 1. 300 Stremler Dr.
 - 2. 205 British Columbia Ave.
 - 3. 411 17th St
 - 4. 412 17th St.
- c. 2009 Leak Survey in Lynden
 - 1. 300 Stremler Dr.
 - 2. 305 Stremler Dr.

3. 1729 D St.
4. 205 British Columbia Ave.
5. 4117th St.

2. **Finding (s):**

Records do not indicate that leak surveys were completed for aboveground piping sections of all CNG elevated/raised services between the service valve and customer piping, such as the service located at 108 Front St., Lynden.

Cascade Response

Finding 1a

Cascade has continued to improve regarding this issue. As a result of discussion with the WUTC, CNG changed our procedures regarding documentation kept for leak surveys between 2007 and 2008. Prior to 2008, mapping documentation was not kept. As we have further discussed with Staff, we seek continuous improvement in our mapping records and correct problems when they are detected.

We have confirmed that the 2007 maps used for this leak survey did not have some services that they should have shown. We have confirmed that the current maps that we will use for the next leak survey show those services.

Finding 1b

On this survey, one service was not documented on the maps. We have confirmed that the one service has been added to the maps for future surveys.

Some of the service lines were not highlighted with magic marker to indicate survey completion on the maps used by the survey crew. We believe our employees performed the survey, but did not mark the maps to record the survey properly. There are a few here or there that were not marked, and it appears our employees should have spent more time documenting their survey. We will give them training to improve future documents.

Finding 1c

Some of the service lines were not highlighted with magic marker to indicate survey completion on the maps used by the survey crew. We believe our employees performed the survey, but did not mark the maps to record the survey properly. There are a few here or there that were not marked, and it appears our employees should have spent more time documenting their survey. We will give them training to improve future documents.

Finding 2

We train our employees to survey the entire service line up to the customer piping connections, regardless of the height of the meter. When they indicate they have leak surveyed a service line,

it is understood that they surveyed all the piping that Staff described. We find no reason to believe that our employees did not survey the service lines Staff described. We believe we have complied with the rule.

We visited the location Staff indicates and took the attached photograph. We did not find any leaks during that inspection.

Probable Violation

5. **WAC 480-93-188(6) Gas leak surveys**

(6) *Each gas pipeline company must perform self audits of the effectiveness of its leak detection and recordkeeping programs. Each gas pipeline company must maintain records of the self audits for five years. Self audits must be performed as frequently as necessary, but not to exceed three years between audits. At a minimum, self audits should ensure that:*

- (a) *Leak survey schedules meet the minimum federal and state safety requirements for gas pipelines;*
- (b) *Consistent evaluations of leaks are being made throughout the system;*
- (c) *Repairs are made within the timeframe allowed;*
- (d) *Repairs are effective; and*
- (e) *Records are accurate and complete.*

Charges(s):

CNG has not performed effective self audits of its leak detection and recordkeeping programs.

Finding (s):

CNG's self audits have not effectively ensured that their leak survey mapping records are accurate and complete. CNG leak survey maps are missing mains/services.

Cascade Response

WAC 480-93-188(6) requires the performance of self audits that at a minimum review 5 specific elements. We have record of completing our last self audit on December 31, 2008. On that audit, we did not check the leak survey maps for accuracy and completeness.

Staff's finding presents a new factor that Staff has not presented to us before. We had interpreted (6)(e) to only mean the leak detection records and leak records required by WAC 480-93-187 and 480-93-188(5), and not the maps showing the pipe that was surveyed. We will begin including this factor in future self audits.

We have discussed the mapping accuracy issues with Staff, and explained our program to ensure that our maps continue to improve. We are working to improve our records.

Probable Violation

6. **WAC 480-93-200(7) Reporting requirements**

- (7) *Each gas pipeline company must file with the commission the following annual reports no. later than March 15 for the preceeding calendar year:*
- (a) *A copy of every Pipeline and Hazardous Materials Safety Administration (PHMSA) F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, Office of Pipeline Safety.*
 - (b) *A report titled, "Damage Prevention Statistics." The Damage Prevention Statistics report must include in detail the following information: ...*
 - (c) *A report detailing all construction defects and material failure resulting in leakage. Each gas pipeline company must categorize the different types of construction defects and material failures anticipated for their system.*

Charges(s):

CNG did not file annual reports with the commission in a timely manner.

1. **Finding (s):**

CNG exceeded the filing deadline for their annual report in accordance with WAC 480-93-200(7)(a).

2. **Finding (s):**

CNG exceeded the filing deadline for their annual report in accordance with WAC 480-93-200(7)(b).

3. **Finding (s):**

CNG has not provided incident and hazardous failure and defect information for preventative and self audit purposes. Examples follow:

- a. *CNG exceeded the filing deadline for their annual report in accordance with WAC 480-93-200(7)(c).*
- b. *CNG's data reporting on this form is inconsistent with data provided to PHMSA on Form PHMSA F7100.1-1.*

Cascade Response

Finding 6.1

The F-7100.1-1 and F-7100.2-1 for 2008 were approved and mailed on March 13, 2009. Cascade submitted the materials before the filing date.

Finding 6.2

The Damage Prevention Statistics report was approved on March 11, 2009. It was most likely mailed with the other reports on March 13. Cascade submitted the materials before the filing date.

Finding 6.3 (a)

The Construction Defect and Material Defect report was approved and mailed on April 10, 2009. UTC Staff had notified us in April that our report was late, and we immediately completed the report and submitted it.

Finding 6.3(b)

We have reviewed our 2008 Construction and Material Defect report, and find our original Construction and Material Defect was incorrect. We have attached an updated report of the 2008 data.

Probable Violation

7. 49 CFR CFR §192.161 Supports and anchors.

- (b) *Each exposed pipeline must have enough supports or anchors to protect the exposed pipe joints from the maximum end force caused by internal pressure and any additional forces caused by temperature expansion or contraction or by the weight of the pipe and its contents.*

Charges(s):

CNG did not provide required support or anchors for exposed pipeline.

1. **Finding (s):**

A 4-branch 12-meter manifold made up of 2" steel appears to be entirely supported by an unsupported ¾" riser. The manifold is located on Judson St. in the alley S. of Front St., Lynden with one of the meters identified in black magic marker as 415, is not independently supported and appears to require customer piping for support of the pipe and equipment.

2. **Finding (s):**

Alley N. of Front St., Bellingham Meter #592972: riser has bend and is extended without support.

Cascade Response

Finding 7.1

We have installed additional supports between the manifolds, and at the ends to the ground to provide additional support against unusual loading. Please see the attached documents.

Finding 7.2

We have straightened the riser, lowered the meter, and added barricades. Please see the attached documents.

Probable Violation

8. **49 CFR CFR §192.365 Service lines: Location of valves**
(b) *Outside valves. Each service line must have a shutoff valve in a readily accessible location that, if feasible, is outside of the building.*

Charges(s):

Service line shutoff valves were not readily accessible.

Finding (s):

The following service line shutoff valves were buried or partially buried.

1. *Meter #572694, Bellingham*
2. *411 W. Holly St., Bellingham*
3. *Judson St. Alley S. of Front St., Lynden (Home Furnishings) Remote number 02 28858387*

Cascade Response

Location	Action
Meter #572694 2701 Meridian, Bellingham	Service valve accessible. Removed cardboard and leaves. Stop was not buried.
411 W. Holly, Bellingham	Service valve accessible. Partially buried service valve eliminated 12/7/09 by removing service line back to main.
Judson St. Alley S. of Front St. 309 Judson, Lynden	Service valve accessible, but partially buried. Raised the service valve above grade. Pictured in PV 9.2.14

Probable Violation

9. **49 CFR 6192.491 Corrosion control records**

(c) *Each operator shall maintain a record of each test, survey, or inspection required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist. These records must be retained for at least 5 years, except that records related to §§192.465 (a) and (e) and 192.475 (b) must be retained for as long as the pipeline remains in service.*

Charges(s):

CNG did not provide protection for their pipe in accordance with this section.

1. **Finding (s):**

CNG exceeded the frequency interval for gas pipeline atmospheric corrosion control monitoring inspection. No records are available for the Bellingham shut-down Section 1009 (install approx. 1957-60) of approximately 2,570 services. This Section was inadvertently excluded from atmospheric corrosion control monitoring since installation.

2. **Finding (s):**

Pipe-to-soil interface issues were noted during inspection at the following locations:

1. *3219 Meridian St., Bellingham*
2. *2731 Meridian & W. Illinois (SW Comer - Premier Wireless), Bellingham*
3. *Meter #218495 (Alley) Bellingham*
4. *Meter #654225 (Alley) Bellingham*
5. *SE Comer Champion St. & Prospect (in alcove) Bellingham*
6. *Meter #285394, Bellingham*
7. *411 W. Holly St., Bellingham*
8. *Meter #631409, Bellingham to Ferndale line*
9. *Aldrich Rd. & Larrabee Rd., Bellingham*
10. *5744 Ferndale, Ferndale (Ferndale Grain)*
11. *Meter #255793, Lynden (Alley N. of Front St.)*
12. *Meter #288723, Lynden (Alley N. of Front St.)*
13. *Judson St. Alley S. of Front St. Meter W. of Meter #255793, Lynden*
14. *Judson St. Alley S. of Front St., Lynden (Home Furnishings)*
15. *Judson St. Alley S. of Front St., Lynden Meter #186095*

3. **Finding (s):**

Atmospheric corrosion was noted at the following locations and/or records do not indicate that CNG has inspected pipeline for atmospheric corrosion of pipeline on the inside of welded or tack-welded pipe support slippers. Examples follow:

1. 2500 Meridian, Bellingham
2. 1411 Girard, Bellingham (Kentucky Fried Chicken)
3. 901 Dupont St., Bellingham (Dupont Cleaners)
4. 5744 Ferndale, Ferndale (Ferndale Grain)
5. Alley N. of Front St., Lynden W. of Meter #179841
6. Judson St. Alley S. of Front St. E. of 511 Front St., Lynden (2 meter manifold)
7. Judson St. Alley S. of Front St., Lynden (Meter 648163)
8. Judson St. Alley S. of Front St., Lynden (11-12 meter manifold)
9. Aldrich Rd. & Larrabee Rd., Bellingham to Ferndale line
10. 3219 Meridian St., Bellingham
11. 2801 Meridian & W. Illinois NW Corner (Assoc. Implant & Cosmetic Dentistry), Bellingham
12. Meter #572694, Bellingham
13. 2615 Meridian, Bellingham
14. 2710 Meridian, Bellingham
15. Meter #616227, Bellingham
16. Meter 631409, Bellingham to Ferndale line
17. Aldrich Rd. & Larrabee Rd., Bellingham to Ferndale
18. Judson St. Alley S. of Front St. W. of Meter #255793, Lynden
19. 523 Front St., Lynden Meter #585429
 - a. Tack-welded slipper for pipe support
20. Judson St. Alley S. of Front St., Lynden Meter #186095
 - a. Tack-welded slipper for pipe support
21. Judson St. Alley S. of Front St. W. of Meter #255793, Lynden
 - a. Welded slipper for pipe support

Cascade Response

Finding 9.1

The record of last inspection for the 2,570 services designated Section I009 in Bellingham was December 1, 2003. That was the last walking survey performed for all Bellingham meters prior to Cascade changing to vehicle mobile collection for meter data. During that last walking survey, each meter was reviewed for atmospheric corrosion.

Section I009 was mistakenly left off of our work schedule to survey the meters once every 3 years to meet the requirements of this rule. Upon discovery of our error, September 23 during the UTC inspection, we began surveying those meters, and completed survey on December 25, 2009.

Finding 9.2

We have surveyed each location noted by Staff and record the following:

	Location	Action	Date
1	3219 Meridian St., Bellingham	Remediated	11/23/09
2	2731 Meridian & W. Illinois (SW Corner - Premier Wireless), Bellingham	Remediated	11/23/09
3	Meter #218495 (Alley) Bellingham	Remediated	11/23/09
4	Meter #654225 (Alley) Bellingham	Remediated	11/23/09
5	SE Corner Champion St. & Prospect (in alcove) Bellingham	Remediated	10/16/09
6	Meter #285394, Bellingham	Remediated	12/7/09
7	411 W. Holly St., Bellingham	Retired at main	12/7/09
8	Meter #631409, Bellingham to Ferndale line	Remediated	11/30/09
9	Aldrich Rd. & Larrabee Rd., Bellingham	Remediated	12/11/09
10	5744 Ferndale, Ferndale (Ferndale Grain)	Remediated	12/23/09
11	Meter #255793, Lynden (Alley N. of Front St.)	Remediated	12/4/09
12	Meter #288723, Lynden (Alley N. of Front St.)	Retired at main	12/8/09
13	Judson St. Alley S. of Front St. Meter W. of Meter #255793, Lynden	Remediated	12/2/09
14	Judson St. Alley S. of Front St., Lynden (Home Furnishings)	Remediated	12/11/09
15	Judson St. Alley S. of Front St., Lynden Meter #186095	Remediated	12/2/09

Finding 9.3

We have surveyed each location noted by Staff and record the following:

	Location	Action	Date
1.	2500 Meridian, Bellingham	Remediated	12/17/09
2.	1411 Girard, Bellingham (Kentucky Fried Chicken)	Remediated	10/14/09
3.	901 Dupont St., Bellingham (Dupont Cleaners)	Remediated	12/17/09
4.	5744 Ferndale, Ferndale (Ferndale Grain)	Remediated	12/23/09
5.	Alley N. of Front St., Lynden W. of Meter #179841	Remediated	12/11/09
6.	Judson St. Alley S. of Front St. E. of 511 Front St., Lynden (2 meter manifold)	Remediated	12/10/09
7.	Judson St. Alley S. of Front St., Lynden (Meter 648163)	Remediated	11/16/09
8.	Judson St. Alley S. of Front St., Lynden (11-12 meter manifold)	Remediated	12/7/09
9.	Aldrich Rd. & Larrabee Rd., Bellingham to Ferndale line	Remediated	12/11/09
10.	3219 Meridian St., Bellingham	Remediated	11/23/09
11.	2801 Meridian & W. Illinois NW Corner (Assoc. Implant & Cosmetic Dentistry), Bellingham	No deficiencies found	11/25/09
12.	Meter #572694, Bellingham	No deficiencies found	11/25/09
13.	2615 Meridian, Bellingham	No deficiencies found	11/25/09
14.	2710 Meridian, Bellingham	Remediated	12/17/09
15.	Meter #616227, Bellingham	No deficiencies found	11/25/09
16.	Meter 631409, Bellingham to Ferndale line	Remediated	11/30/09
17.	Aldrich Rd. & Larrabee Rd., Bellingham to Ferndale	Duplicate of #9	
18.	Judson St. Alley S. of Front St. W. of Meter #255793, Lynden	Remediated	11/25/09
19.	523 Front St., Lynden Meter #585429 a. Tack-welded slipper for pipe support	Inspected set including pipe support. No corrosion deficiencies found.	11/25/09
20.	Judson St. Alley S. of Front St., Lynden Meter #186095 a. Tack-welded slipper for pipe support	Inspected set including pipe support. No corrosion deficiencies found.	11/25/09

	Location	Action	Date
21.	Judson St. Alley S. of Front St. W. of Meter #255793, Lynden	Remediated ground interface.	12/2/2009
	a. Welded slipper for pipe support	Inspected pipe support, no deficiencies found.	

Probable Violation

10. **49 CFR §192.616 Public Awareness.**

- (e) *The program must include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations.*
- (f) *The program and the media used must be as comprehensive as necessary to reach all areas in which the operator transports gas.*

Charges(s):

CNG did not have or did not provide evidence of their public awareness program.

1. **Finding (s):**

CNG personnel did not have or did not provide PA documentation as follows:

- a. *One-call center Baseline message Frequency evidence.*
- b. *Emergency Official Baseline message evidence for 2008 & 2009.*
- c. *Public Officials evidence for the last 2 intervals/cycles.*
- d. *Excavator & Contractor evidence of mailing for Whatcom County only for 2007, 2008 and 2009.*

2. **Finding (s):**

CNG did not have or did not provide PA documentation for the Transmission stake holders audience as follows:

- a. *Residents along route - provide evidence/documentation of last 2 intervals/cycles and how update/verify property owner changes.*
- b. *One-call center.*
- c. *Emergency Official - evidence of last three annual PA messages.*
- d. *Public Officials - evidence of last two PA intervals/cycles.*
- e. *Excavator and Contractor - evidence of the last 3 PA intervals/cycles.*

3. **Finding (s):**

CNG did not have or did not provide PA documentation identifying how CNG evaluates their present PA program.

Cascade Response

Finding 10.1

- a. One-call center Baseline message Frequency evidence.

Our public awareness program does not require frequency evidence for this stakeholder. Cascade CP 503.046 requires that “Cascade will provide the Utilities Notification Center with accurate line location and mapping information. Mapping services and the districts maintain maps outlining a prism polygon one quarter mile around all gas mains. New maps are periodically created and supplied to Utilities Notification Center.”

We maintain regular communications with the Utilities Notification Center, and update our maps as needed. Attached are copies of our current system boundary maps for Whatcom County.

b. Emergency Official Baseline message evidence for 2008 & 2009.

In 2007 and 2008, we had tried a program of direct contact through our local operations offices. We did not find that emergency officials wanted to participate. The records for 2007 and 2008 are incomplete. We were not sufficiently documenting the communications and messages to demonstrate our performance.

In 2009 we joined with the Pipeline Association for Public Awareness program to improve our records and communications. The PAPA 2009 letter and materials were sent to the 2009 list of emergency officials on December 7, 2009.

c. Public Officials evidence for the last 2 intervals/cycles.

In 2007, we had tried a program of direct contact through our local operations offices. We did not find that public officials wanted to participate. The records for 2007 and 2008 are incomplete. We also were not sufficiently documenting the communications and messages to demonstrate our performance.

In 2009 we joined with the Pipeline Association for Public Awareness program to improve our records and communications. The PAPA 2009 letter and materials were sent to the 2009 list of public officials on October 30, 2009.

d. Excavator & Contractor evidence of mailing for Whatcom County only for 2007, 2008 and 2009.

In 2007 and 2008 we mailed WUCC Recommended Digging Guidelines to excavators located in our service counties. The records for 2007 and 2008 are incomplete. We did not sufficiently document the communications and messages to demonstrate our performance.

In 2009 we joined with the Pipeline Association for Public Awareness program to improve our records and communications. The PAPA 2009 Excavation Safety Guide was sent to the 2009 list of excavators on May 1, 2009.

Finding 10.2

a. Residents along route - provide evidence/documentation of last 2 intervals/cycles and how update/verify property owner changes.

Prior to 2009, we had a program to give out materials to residents along the transmission pipeline. We found that this was not being performed correctly, and that our

documentation was not sufficient. These records are incomplete, and do not completely demonstrate our performance.

In 2009, we utilized a targeted mailing service to reach these stakeholders and improve our documentation. The pamphlet distributed on May 1, 2009 and demonstration documents are attached.

- A. Summary of the number of mailings performed by county.
- B. Example map showing the mailing boundary. Dots represent potential affected public.
- C. Example of journal entries that record the contact activity for the selected recipients. Shows that the contacts were made on May 1, 2009 by mailing the pamphlet.
- D. Copy of the pamphlet that was mailed to the 13,596 identified recipients in Whatcom County.

Each year before mailing, the mailing service combines publicly available parcel data and GIS information that Cascade provides to establish a corridor of residents and businesses within 660 yards of our transmission lines. Applicable locations are placed into a mailing database. The GIS centerlines used are the same ones reported to WUTC for GIS transmission line mapping.

- b. One-call center.
- c. Emergency Official - evidence of last three annual PA messages.
- d. Public Officials - evidence of last two PA intervals/cycles.
- e. Excavator and Contractor - evidence of the last 3 PA intervals/cycles.

The programs and messages presented in Finding 10.1 cover the same Call Center, Emergency Officials, Public Officials, and Excavators. Please refer to that documentation.

Finding 10.3

Cascade's Public Awareness Program document is attached. Section .07 Program Evaluation explains how we evaluate our programs.

As we described in this response, we have been monitoring the program. We have found deficiencies, and taken steps to improve our documentation, outreach, and message effectiveness. We are happy to discuss those evaluations and improvements if Staff needs more information to determine our compliance.

Area of Concern

1. **WAC 480-93-015 Odorization of Gas**

CNG's procedures do not clearly identify an engineering based method for choosing the location to conduct sniff tests. Documentation indicates that monthly sniff tests are conducted at 48 rotational locations in the Whatcom County systems served by 8 odorizers. However, it is unclear whether these test locations adequately represent those locations where odorant levels are most likely to be the weakest or are continually reviewed and adjusted for factors such as system growth, etc.

Cascade Response

Cascade's Company Procedure 747 procedure for selecting sniff test locations meets and exceeds code requirements, per 747.053:

"Sniff tests shall be conducted at least once per calendar month at or near the same time each month as possible for each system being served (including customer locations served by an individual pipeline tap). Since all parts of the distribution systems must be adequately odorized, it is preferable to test odorant levels at the extremities on each system where odorant levels are most likely to be the weakest. Whenever practicable, up to three test sites at the various extremities of each system should be selected for routine testing. Select only one site each month for test but select a different site each month on a rotational basis so that all sites are tested routinely."

A list of the locations we have selected for test is attached.

We understand Staff's concern that locations for test be selected to determine that the natural gas is properly odorized. The method currently used by Cascade uses to select test locations is adequate to ensure that the natural gas is properly odorized.

Area of Concern

2. **WAC 480-93-180(I) Plans and procedures**

CNG does not appear to have detailed knowledge for gaining timely access to their transmission pipeline within the BP Refinery.

Staff notes that CNG presently has 2 employees that complete leak survey on this line that have completed the Refinery's safety orientation.

Cascade Response

We agree with Staff's concern that speedy access to the BP Refinery may be needed in some emergency situations. We have attached a statement from BP Refinery regarding access in an emergency.

We also have emergency valves exterior to the plant which can be used to isolate the pipe on the BP Refinery property.

We believe these capabilities are sufficient to ensure the safety of BP Refinery employees and property in case of an emergency originating from our pipeline.

Area of Concern

3. **WAC 480-93-180(1) Plans and procedures**
Records do not indicate that prior to the commencement of their present year leak survey's that CNG had reviewed the previous year's leak survey maps for inconsistencies.

Cascade Response

We believe that Staff's concern is based on some services not being clearly posted on the maps from one year to the next. Our employees review the maps, and have been instrumental in the improvement of the leak survey maps that are used. Inconsistencies are noted during the survey and that information is relayed to Mapping Services via the Distribution Clerk in charge of handling those changes so that the maps can be made more current prior to the next year's survey. This is an ongoing process that requires the continuous improvement of our maps. We want our maps as up-to-date as possible and will continue to do work toward that objective.

Area of Concern

4. **WAC 480-93-188(3) Gas leak surveys**

A couple of High Occupancy structures were removed from the HO list for acceptable reasons but were not placed back on the list when the structure again met the HO structure definition.

Cascade Response

Based on Staff's finding, we will improve our training for these requirements. We had not detected this problem, but will take steps to improve our performance.

Area of Concern

5. WAC 480-93-188(3) Gas leak surveys

The Bellingham Section 1 Business District leak survey conducted in the field does not match the Business District identified on the Bellingham zone map for Section 1.

Cascade Response

We will clearly define this area and make sure that future surveys cover those boundaries shown on the zone maps.

Area of Concern

6. **49 CFR 6192.615 Emergency plans**

CNG provided documentation which identified that some manner of liaison with local officials had occurred however, no frequency regarding the exchange of that information, and the updating of required contact information has been established.

Cascade Response

Cascade conducts regular liaison with emergency officials, both through these requirements, and our shared community responsibility. We did not document all liaison activities making demonstration of compliance difficult. We will work to improve these records.

Area of Concern

7. **49 CFR 6192.709 Transmission lines: Record Keeping**
CNG patrols did not note/monitor terrain change (regarding depth of cover) over their transmission line due to excavation by others in public roadway ditch-line on west side of Irongate Rd., Bellingham - west of Haines Lawn Care.

Cascade Response

We conduct patrols to look for indications of leaks, construction activity, exposed pipe conditions, pipeline markers (installed, visible, and readable), other physical factors such as safety related conditions affecting the safety and operation of the pipeline system, and new High Occupancy Structures or Areas. This ditch line has existed for many years over the pipeline and nothing about it has changed recently. Patrolling personnel would not have had any reason to note deficiencies at this ditch crossing our transmission line as there was no indication of abnormal conditions in this area. (See Picture).

We have determined that we could prevent potential damage to the pipeline by asking the city to allow us to install a solid culvert in this ditch to discourage excavations. See attached work order scheduled for completion. This will mitigate the external damage potential.