



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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(360) 664-1160 • TTY (360) 586-8203

Ref. No. Docket PG-101397

CERTIFIED MAIL

February 4, 2011

Irina Robinson
Mount Vernon Terrace Apartments
3118 Mount Vernon
Spokane, WA 99207

Dear Ms. Robinson:

RE: 2010 Master Meter System Standard Inspection – Mount Vernon Terrace Apartments

Thank you for your letter of intent dated December 28, 2010 and the supplemental information provided on January 5, 2011 addressing the results of our September 2010 inspection. We have reviewed the material and found six items that need attention before this docket can be closed.

Your response needed

Please review this letter carefully and respond by March 7, 2011. Your response should include copies of the corrected items and/or the required documentation.

1. Staff reviewed Mount Vernon Terrace Apartments Operations and Maintenance (O&M) manual and found it lacking detail and missing required elements. Please provide an updated copy of the O&M manual. The following is a list of items lacking detail and/or the missing required elements.
 - a. The Office of Pipeline Safety U.S. Department of Transportation's name has been changed to Pipeline and Hazardous Materials Safety Administration (PHMSA). All references to the Office of Pipeline Safety should be corrected.
 - b. Under Investigation of Failures, Mount Vernon Terrace Apartments does not have the correct telephonic incident report times. The correct times are found in Washington Administrative Code (WAC) 480-93-200 (1) and (2). A copy of the WAC was provided at the time of the inspection.
 - c. Under Investigation of Failures, Mount Vernon Terrace Apartments does not include federal reportable incidents and the appropriate report times found in 49 CFR §191.5.



- d. Mount Vernon Terrace Apartments did not include a list of annual reports that must be filed with the UTC, they are found in WAC 480-93-200 (7)(a)-(c) and are listed below:
 - i. PHMSA annual report
 - ii. Damage Prevention Statistics Report
 - iii. Construction Defects and Material Failures Report
 - e. Mount Vernon Terrace Apartments did not include new construction as a covered task in accordance with WAC 480-93-13(4)
 - f. Mount Vernon Terrace Apartments did not state and did not include a procedure to maintain contractor Operator Qualification certifications and Drug and Alcohol testing information.
 - g. Although Mount Vernon Terrace Apartments has a form for the annual review and update of the O&M, the plan does not state it will annually review and update the O&M manual in accordance with 49 CFR §192.605 (a).
 - h. Mount Vernon Terrace Apartments did not include all requirements of 49 CFR §192.617. Mount Vernon Terrace Apartments must establish procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of a recurrence.
 - i. Under Records, Mount Vernon Terrace Apartments did not state it updates its records within six months of when it completes any construction activity and make such records available to appropriate company operations personnel.
 - j. Under Patrolling, Mount Vernon Terrace Apartments did not state it would patrol twice annually not to exceed 7 ½ months in accordance with 49 CFR §192.721.
2. Staff reviewed Mount Vernon Terrace Apartments Emergency Plan and found it lacking detail and missing required elements. The following is a list of items lacking detail and/or the missing required elements.
- a. Under UTC Requirements, Mount Vernon Terrace Apartments does not have the correct telephonic incident report times. The correct times are found in WAC 480-93-200 (1) and (2). A copy of the WAC was provided at the time of the inspection.
 - b. Under UTC Requirements, Mount Vernon Terrace Apartments does not include federal reportable incidents and the appropriate report times found in 49 CFR
 - c. §191.5.
3. Staff understands that when the system was installed in 1973, the MAOP was determined to be 40 psig. A MAOP of 40 psig can only be substantiated if the original pressure test information is found and a copy is provided to the UTC. If the original pressure test information is not found, the MAOP of the system is based on 49 CFR §192.619 (3) and is 2 psig. Provide a copy of the original pressure test or change the O&M manual to reflect an MAOP of 2 psig.

The Pressure Test Requirements in Mount Vernon's O&M manual are not consistent for a 40 psig or 2 psig MAOP system and need to be corrected.

4. Under Corrosion Control, Mount Vernon Terrace Apartments does not state a pipe-to-soil read will be taken every time a pipe is exposed and the coating removed.
5. Under Corrosion Control, Mount Vernon Terrace Apartments does not state that remedial action will be taken within 90 days.
6. Mount Vernon Terrace Apartments did not include copies of the evaluations (written tests) or certification for Irina Robinson or Anatolyic Kirichenko.

If you have any questions, or if we may be of any assistance, please contact Patti Johnson at (360) 870-4915 or (360) 664-1266. Please refer to Docket PG-101397 in any future correspondence regarding this inspection.

Thank you for your cooperation and commitment to pipeline safety.

Sincerely,



David D. Lykken
Pipeline Safety Director

cc. Ray Allen