April 23, 2004

Carole J. Washburn
Executive Secretary
Washington Utilities & Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Re: Proposed Revisions to 480-93 WAC & Reply to Economic Impact Statement for Docket UG-011073.

Dear Ms Washburn:

The Georgia Pacific Camas Mill has reviewed the proposed revisions to 480-93 WAC and submits the attached comments. We have also provided economic impact costs associated with the proposed revisions.

WAC 480-93-015 Odorization of gas

WUTC Proposed Revision:

(2) Operators must use odorant testing instrumentation when conducting sniff tests. Sniff tests must be performed at least once monthly.

Camas Mill Response:

CFR 49 Part 192.625 requires operators to perform "periodic testing" to insure the proper concentration of odorant. The Camas Mill Odorization test program requires that the downstream gas be tested six times per calendar year. After 12 years of operation, the Mill has never had an odorization non-compliance and our test records indicate that the gas is consistently detectible below a .25% gas in air mixture. We recommend that the WUTC strike the requirement to perform "sniff testing on a monthly basis" as the current D.O.T. language, which allows less frequent monitoring, has with stood the test of time and has never facilitated a low odorization incident on the Camas Mill System.

Cost Impact: The proposed rule will increase the inspection requirements from 6 to 12 tests per calendar year. This will translate into an additional annual expense of $1,800.

WAC 480-93-080 Welder and plastic joiner identification and qualification

WUTC Proposed Revision

(2) Welders and plastic joiners must carry appropriate identification and qualification cards showing the name of the welder or joiner, their qualifications, the date of qualification and the operator whose procedures were followed for the qualification. Welders and plastic joiners qualification cards will be subject to commission inspection at all times when qualified personnel are working on facilities subject to commission jurisdiction.

Camas Mill Response

As a result of the wide range of weld procedures utilized at the Camas Mill, procedure specific qualification cards are not practical. Since each of the Mills ASME qualified welders are in possession of a weld procedure / qualification document, we propose that the Commission accept the original qualification document in lieu of the proposed "card".

Cost Impact: The cost impact to produce and laminate the cards is under $100. The real impact is the time requirement /work disruption associated with orchestrating the production and distribution of the cards in a lean labor environment.

WAC 480-93-100 Valves

Proposed Revision:

(1) Each operator must have a written valve maintenance program detailing the valve selection process, inspection, maintenance, and operating procedures. The written program must detail which valves will be maintained under 49 CFR ⌓ 192.745, 49 CFR ⌓ 192.747, and WAC 480-93-100. The written program will also outline how the operator will monitor and maintain valves during construction projects to ensure accessibility.

Camas Mill Response:

The Camas Mill has a well-documented valve maintenance program that is covered in the Operator Qualification training program. The Camas Mill also has a segment in the operations and maintenance manual that addresses valve operating and inspection protocols. This proposed rule sends a mixed message to operators as it combines the

Operator Qualification (how to perform the task) and the O & M procedure (which defines the task, inspection frequency and documentation requirements) into a new hybrid program . This will disrupt the well-defined boundaries between OQ and O&M and will result in duplication of materials between the two programs.

Cost Impact: Development of the hybrid valve program will involve a full section re-write and manual revision distribution. The re-write and acceptance review will translate into an additional expense of $1,600.

WAC 480-93-110 Corrosion control

WUTC Proposed Revision:

(4) Operators must have written procedures for the proper use, maintenance, and where feasible the calibration of cathodic protection equipment and instrumentation. At a minimum, each operator must follow the manufacturer's recommended practices for equipment and instrumentation maintenance and calibration. Equipment or instruments that are incapable of being calibrated must be checked for accuracy on a scheduled frequency.

Camas Mill Response:

The only "instrument" for determining compliance with the Corrosion Control requirements as stated in CFR 49 Part 192.463 is a multimeter. Since multimeters are designated as solid-state devices, it is not uncommon for industrial grade multimeters to have an operating life in excess of 10 years with little if any deterioration in measurement accuracy. The Camas Mill does not support an annual instrument calibration as it will not contribute to public safety, however an accuracy check in the form a measuring the potential difference across a known voltage such as a 1.5 volt battery would better serve industry and the public.

Cost Impact: The cost to calibrate a digital multimeter at a NIST certified test facility is approximately $110 per unit. Since the calibration cost exceeds 50% of the replacement cost, it is highly likely that the meters would be replaced annually vs. calibrating. Estimated annual calibration cost for 2 multimeters $220 vs. replacement cost for 2 meters $376

WAC 480-93-110 Corrosion control

(5) Each operator's procedures manual must have written procedures explaining how cathodic protection related surveys, reads, and tests will be conducted. Examples of such procedures include, but are not limited to, how to determine IR drop, (as defined in 49 CFR §192 Appendix D) how to conduct electrical surveys, how to test casings for electrical isolation, how to test casings for shorted conditions, and how to measure and interpret 49 CFR ⌓ 192 Appendix D criteria.

Camas Mill Response: The Camas Mill has a detailed corrosion inspection section that is covered in the Operator Qualification training program. The Camas Mill also has a segment in the operations and maintenance manual that addresses the specific test and inspection protocols. This proposed rule sends a mixed message to operators as it combines the Operator Qualification (how to perform the task) and the O & M procedure (which defines the task, inspection frequency and documentation requirements) into a new hybrid program . This will disrupt the well-defined boundaries between OQ and O&M and will result in duplication of materials between the two programs.

Cost Impact: Development of the hybrid valve program will involve a full section re-write and manual revision distribution. The re-write and acceptance review will translate into an additional expense of $1,600.

WAC 480-93-124 Pipeline markers

WUTC Proposed Revision:

(5) Surveys of pipeline markers not associated with section (3) above must be conducted as frequently as necessary, to maintain the markers to ensure that they are visible and legible, but at intervals not to exceed five years. The survey records must be kept for a minimum of ten years.

Camas Mill Response:

It is the Mills understanding that CRF 49 Parts 192.613 (Continuing Surveillance) and 192.705 (Patrolling) are intended to monitor all aspects of the right of way including pipeline markers. We recommend that you not create a new inspection, but revise the

requirements of "Continuing Surveillance" to monitor the condition of line markers during each scheduled patrol.

Cost Impact: This revision would require a manual revision and a modification to our compliance tracking software and will cost approximately $800.

WUTC Proposed Revision:

(6) Operators must have maps, drawings or other sufficient records indicating class locations and other areas where pipeline markers are required.

Camas Mill Response:

Documentation of pipeline markers on maps does not contribute to pipeline safety and is financially burdensome for small pipeline operators to survey each line markers position and transfer that data onto a drawing.

Cost Impact: All line markers would need to be surveyed to establish their true position: $6,000. Survey data point conversion, addition of data points to the pipeline alignment drawing, Mill review and production plots:$1,800.

WAC 480-93-188 Gas leak surveys

WUTC Proposed Revision:

(2) Gas detection instruments must be maintained, calibrated, and operated in accordance with the manufacturer's recommendation. If there is no manufacturer's recommendation, then instruments must be calibrated at least once monthly, but not to exceed forty-five days between calibrations, but at least twelve times per year.

Camas Mill Response:

Based upon input from Heath Consultants, we propose that the term "calibrate at least once monthly" be modified to state "test at least once monthly". It is a common industry practice to utilize a specialty span gas of a known quantity (100ppm) to test the accuracy of the instrument. We are in support of the span gas test method. The presence of the term "calibration" implies that the instrument must be shipped to the

OEM Manufacture 12 times per year. This will cause financial burden to the Camas Mill in the form of the calibration cost and the need for a second instrument.

Cost Impact: The calibration cost will shift from approximately $200/year to $1,800 /year if the calibration frequency is increased from 1 to 12 times per year. This revision would likely result in the purchase of a second unit as the primary unit would be in transit 1 week per month - $7,000.

Conclusions: Georgia Pacific supports a high percentage of the proposed revisions many of which have been implemented in part or in whole at the Camas Mill since 1992 and we remain committed to be pro-active when it comes to implementing changes that truly contribute to public safety. We look to the WUTC to provide guidance and support to insure the safe, reliable and economically feasible delivery of energy to our facility and ask that you take into consideration our comments and economic impacts in your preparation of the final rule making.

Sincerely,

Steven Wolfe
Fiber – Utility Operations Manager