



McCHORD PIPELINE



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June 26, 2002

Carole J. Washburn, Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. S.W.
P.O. Box 47250
Olympia, WA 98504-7250

SUBJECT: REF. NO. DOCKET TO-000712 WAC 480-75 WRITTEN COMMENTS

Dear Ms. Washburn:

McChord Pipeline Co. submits these comments for consideration in response to the Opportunity to Submit Written Comments on Proposed Rules for Hazardous Liquids Pipeline Safety Rulemaking (Docket No. TO-0000712). McChord Pipeline Co. is an operator of a 14.5-mile length of intrastate pipeline within the State of Washington. McChord Pipeline Co. supports the Washington Utilities and Transportation Commission (WUTC) in its efforts to provide oversight to the pipeline industry within the state. McChord Pipeline Co. remains dedicated to safe operation of the pipeline.

McChord Pipeline Co. appreciates the opportunity to participate in the stakeholder process and the interaction with the Commission regarding the impact this rule will potentially have on our company. McChord Pipeline Co. supports the use of 49CFR195 requirements for the design, operation, construction and maintenance of pipelines within the state. Additional requirements should remain consistent with the federal regulations and enhance those regulations to improve the public safety and protect the environment.

The attached specific comments are submitted for consideration on rules relating to chapter 480-75 WAC. Thank-you for the opportunity to participate in this process. McChord Pipeline Co. remains committed to working and being involved with WUTC to insure the safe operation of our pipeline.

Sincerely,

McChord Pipeline Co.

Alan Cabodi
President

cc : RWS, GAH, CCB/JPW, TJG
Attachments: 3.5" Diskette with formatted info

MPLruleLTR3.DOC

WRITTEN COMMENTS
DOCKET NO. TO-000712
CHAPTER 480-75 WAC PROPOSED RULES
SUBMITTED BY McCHORD PIPELINE CO.

1. **WAC 480-75-370, WAC 480-75-550** Clarification is required as to whether the intent is for existing pipeline operators to evaluate their pipelines every 5 years using these factors. McChord Pipeline Co. believes that the intent as discussed during the stakeholder meetings was for the design factor to be used in the design of new pipelines only and the 5 year assessment would apply to new pipelines designed and constructed after adoption of the rule. McChord Pipeline Co. proposes that the first sentence of WAC 480-75-550 be changed to read “For pipelines designed and constructed after the adoption date of this rule, the maximum operating pressure shall be reevaluated when there is a change in class location.”
2. **WAC 480-75-420 (6)** Notification of the public when performing a pipeline hydrotest is not a present requirement in 49 CFR 195. Hydrotesting with a non-compressible inert fluid represents little, if any, danger to the general public due to the small amount of energy that would be released in the event of a failure. This is very different in the case of a 49 CFR 192 line that is tested with a compressible gas that has a high amount of potential energy. Posting of warning signs along freeways, schools and shopping malls would not improve safety and would create a level of concern that is unwarranted. McChord Pipeline recommends eliminating this requirement.
3. **WAC 480-75-420 (7)** This is also a requirement that is not presently requirement in 49 CFR 195. We see no reason to notify public officials for the same reasons as in #2 above. McChord Pipeline recommends eliminating this requirement.
4. **WAC 480-75-460** We recommend changing the first part of the section to read “For new and **repaired segments of** existing hazardous liquid pipelines, companies...”. As presently worded, the section could be interpreted to have existing pipelines inspect 100% of their existing girth welds. The intent as discussed in the stakeholder meeting was to 100% inspect all new welds.
5. **WAC 480-75-550** The WAC references should be changed from **WAC 480-75-014 and 480-75-015** to **WAC 480-75-360 and 480-75-370**.
6. **WAC 480-75-630 (1)(f)** Prior to establishing this rule, incident reporting requirements for hazardous liquid pipelines provided some opportunity for the Commission to be left uninformed until hearing through the media. **WAC 480-75-630 (1) (a)-(e)** is an inclusive list that covers any incident of significance. Television, newspaper, Internet websites, etc. have differing timelines for reporting news that could make the 2hour reporting requirement impossible to achieve. The media’s report may be purely arbitrary and dependent upon the media’s focus. Verification prior to notifying WUTC would be advisable to avoid false notifications. We recommend eliminating this sub-section since the other sections require notifications of any “significant occurrence”.