

Washington Utilities and Transportation Commission  
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30Aug01

RE: Docket No. UG-011073  
Harry W. Skinner  
Recommended regulatory categories, 30Aug01  
MS Word 97

To all interested commission staff:

Following is a list of subjects that I recommend be fully analyzed and included in any comprehensive review of pipeline safety regulatory language:

1. Full range of physical and operational elements of pipelines which affect performance and safety and maximum allowable limits:  
Age, construction, operating pressures, how and what it's buried in (depth, acidity, corrosive levels, stability, etc.), maximum allowable stresses, maximum tolerable lateral displacement, cathodic activity, magnetic/electric fields, etc.
2. Required elements of best construction, fabrication and installation practices.
3. Required elements of 'best management practices' for maintenance and operations.
4. Required elements of the full range of testing and monitoring techniques, frequency, graphic representation of alignment changes (vertical and horizontal), water hammer tests, etc.
5. Complete listing of possible causes for transients/anomalies during startup, steady operation, shut down, emergency shut down, power outages, ruptures, leaks (and other failure modes), inadvertent valve closings or openings, check valve 'slams', equipment or operator failures, etc.
6. Complete listing of required and available safety devices, equipment, instrumentation and procedures.
7. Complete listing of operator training and skill level elements and demonstrations.
8. Complete listing of all ways that pipelines can and do fail (leak, rupture, unearth, explode, corrode, etc.).
9. Complete listing of allowable product range for each type of pipeline (gasoline, oils, natural gas, water, liquid waste, wastewater, coal slurry, etc.).
10. Conditions requiring pipeline replacement.
11. Conditions requiring double-wall construction.
12. Statement of responsibility facing pipeline owners and operators with regard to public safety, both of their lines as well as their utility corridors and changing land uses and other conditions (flooding, landslides, etc.) surrounding them.
13. Statement of responsibility facing public agencies for monitoring pipeline construction, operation, maintenance and changing land uses and other conditions (flooding, landslides, etc.) surrounding utility corridors.
14. Incident Report information items and required level of detail to be a fully effective information and regulator tool for public safety (are now too cursory to be useful).

15. Need for regular agency notification for changing pressures, products being transported, general operating conditions/events, etc.(both local and state level agencies).
16. Need for periodic independent safety audits.

Other Questions preparatory to revising regulations:

What are current and expected design and operation changes being advanced by the industry or regulatory agencies to improve operations and safety?

All the above has been derived from the point of view of a man on the street who has some technical background who follows the news media and has lived through one dramatic rupture and explosion very near my own residence in Whatcom County. Certainly all of these subjects will not translate directly into regulatory language but if staff do not have a real comfort level with this subject matter in detail, then hire someone who does to fill this need before attempting to draft effective regulations. I hope this helps.

Sincerely,

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