



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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Ref. No. Docket PG-070010

**CERTIFIED MAIL**

December 14, 2007

Wayne Anderson  
President  
Inland Empire Paper Company  
3320 N. Argonne  
Spokane, Washington 99212

Dear Mr. Anderson:

**Subject: 2007 Inland Empire Paper Company Standard Inspection**

We conducted a natural gas safety inspection from November 13, 2007 through November 15, 2007, of Inland Empire Paper Company's (IEP) Spokane Washington pipeline system. The inspection included a records and procedures review and an inspection of pipeline facilities.

Our inspection indicates a series of 48 probable violations and one area of concern, as noted in the enclosed report. The majority of the probable violations are related to IEP's failure to keep abreast of changes in state gas pipeline safety rules which went into effect in 2005 and 2007. This resulted in IEP not having an adequate operation and maintenance (O&M) plan and procedures in place for the continued safe operation of its pipeline system resulting in certain required O&M related activities to go uncompleted.

It is imperative that IEP keep current with state and federal pipeline safety rules and regulations and incorporate those changes into its plans and procedures in addition to ensuring that individuals responsible for the operation of IEP's pipeline facilities are adequately trained on those changes.

**Your response is needed.**

Please review the attached report and respond in writing by January 18, 2008. The response should include a letter of intent and the date you plan to bring the probable violations into full compliance including how the company intends to stay up to date on future changes to pipeline safety rules.



**What happens after you respond to this letter?**

The attached report presents staff's findings on probable violations and does not constitute a finding of violation by the commission at this time.

After you respond in writing to this letter, there are several possible actions the commission, in its discretion, may take with respect to this matter. For example, the commission may:

- Issue an administrative penalty under RCW 81.88.040, or
- Institute a complaint, seeking monetary penalties, changes in the company's practices, or other relief authorized by law and justified by the circumstances, or
- Consider the matter resolved without further commission action.

Staff has not yet decided whether to recommend to the commission pursuit of a complaint or penalty in this matter. Should the commission decide to pursue a complaint or penalty, your company will have an opportunity to present its position directly to the commission.

If you have any questions, or if we may be of any assistance, please contact Scott Rukke at (360) 664-1241. Please refer to docket number PG-070010 in any future correspondence regarding this inspection.

Sincerely,



Carole J. Washburn  
Executive Secretary

Enclosure

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
2007 Standard Inspection of Inland Empire Paper Company's, Spokane WA  
Pipeline System  
Docket PG-070010

**Probable Violations**

The following probable violation(s) of Title 49 CFR Part 192 and Washington Administrative Code (WAC) 480-93 were noted as a result of the inspection of Inland Empire's procedures, records and facilities.

1. **WAC 480-93-180(1) Plans and procedures**

- (1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-200(1)(c) requires notification to the commission within 2 hours for incidents that result in the evacuation of a building, or high occupancy structure or areas. IEP does not have a procedure addressing this requirement in their procedures manual.

2. **WAC 480-93-180(1) Plans and procedures**

- (1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-200(1)(d) requires notification to the commission within 2 hours for incidents that result in the unintended ignition of gas. IEP's procedure 10.2-d (emergency plan) states notification must be made within 6 hours.

3. **WAC 480-93-180(1) Plans and procedures**

- (1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-200(1)(f) requires notification to be made to the commission within 2 hours for incidents that result in a pipeline or system pressure exceeding the

MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020. IEP does not have a procedure addressing this requirement in their procedures manual.

4. **WAC 480-93-180(1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-200(2)(a) requires notification to be made to the commission within 24 hours for incidents that result in the uncontrolled release of gas for more than two hours. IEP does not have a procedure addressing this requirement in their procedures manual.

5. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-200(2)(b) requires notification to be made to the commission within 24 hours for incidents that result in the taking of a high pressure supply or transmission pipeline or a major distribution supply pipeline out of service. IEP does not have a procedure addressing this requirement in their procedures manual.

6. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-200(5) requires that a written report be submitted to the commission within 45 days of receiving the failure analysis of any incident or hazardous condition due to construction defects or material failure. IEP does not have a procedure addressing this requirement in their procedures manual.

7. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual*

*must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-200(6)(a) requires that PHMSA form F-7100.2-1 be submitted to the commission by March 15, for the preceding calendar year. IEP does not have a procedure addressing this requirement in their procedures manual.

8. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-200(6)(b) requires that a report titled "Damage Prevention Statistics" be submitted to the commission by March 15, for the preceding calendar year. IEP does not have a procedure addressing this requirement in their procedures manual.

9. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-200(6)(c) requires that a report detailing construction defects and material failures resulting in leakage be submitted to the commission by March 15, for the preceding calendar year. IEP does not have a procedure addressing this requirement in their procedures manual.

10. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-200(7) requires operators to file with the commission and appropriate public officials, updated emergency contact information. IEP does not have a procedure addressing this requirement in their procedures manual.

11. **WAC 480-93-180 (1) Plans and procedures**

- (1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-200(8) requires operators to provide to the commission daily construction and repair activity reports. IEP does not have a procedure addressing this requirement in their procedures manual.

12. **WAC 480-93-180 (1) Plans and procedures**

- (1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-200(9) states that when an operator is required to file a copy of a DOT Drug and Alcohol Testing Management Information System (MIS) Data Collection Form with the U.S. Department of Transportation (DOT), Office of Pipeline Safety, the operator must simultaneously submit a copy of the form to the commission. IEP has less than 50 DOT covered employees but was asked by PHMSA to submit this information which then requires submittal to the commission per WAC 480-93-200(9). IEP did not submit this form to the commission in 2006 or 2007 and has no procedural requirement to do so.

**Note:**

Although this is related to IEP's drug and alcohol program, the requirement to submit the form to the commission is found under WAC 480-93 and a procedure would be required per WAC 480-93-180.

13. **WAC 480-93-180 (1) Plans and procedures**

- (1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

49 CFR Part 192.150 requires that each new transmission line and each replacement of line pipe, valve, fitting, or other line component in a transmission line is designed and constructed to accommodate the passage of instrumented

internal inspection devices. IEP does not have a procedure addressing this requirement in their procedures manual.

14. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-080(1)(b) requires the use of testing equipment to record and document welding essential variables. IEP does not have a procedure addressing this requirement in their procedures manual.

15. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-080(1)(d) requires that qualified written welding procedures be located on-site where welding is being performed. IEP does not have a procedure addressing this requirement in their procedures manual.

16. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

49 CFR Part 192.305 requires inspection of each transmission line and main during construction. IEP does not have a procedure addressing this requirement in their procedures manual.

17. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

49 CFR Part 192.307 requires inspection of transmission line parts, pipe and components at the site of installation to ensure no damage has occurred. IEP does not have a procedure addressing this requirement in their procedures manual.

18. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-110(4) requires detailed written procedures explaining how cathodic protection related surveys, reads, and tests will be conducted. IEP does not have a procedure addressing these requirements in their procedures manual.

19. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-110(8) requires that a CP test read be taken on all exposed facilities where the coating has been removed. IEP does not have a procedure addressing these requirements in their procedures manual.

20. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

49 CFR Part 192.481(b) requires that during atmospheric corrosion surveys, special attention be made to soil/air interfaces, thermal insulation, under disbonded coating, pipe supports, splash zones, deck penetrations and spans over water. IEP does not have a procedure addressing these requirements in their procedures manual.

21. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual*



*must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-110(1) requires that records be retained for each cathodic protection test, survey, or inspection required by 49 CFR Subpart I, and chapter 480-93 WAC. IEP does not have a procedure addressing these requirements in their procedures manual. Record keeping length is not spelled out in IEP procedures.

22. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-110(5) requires that casings be inspected/tested for electrical isolation, and the carrier pipe for adequate cathodic protection, annually not to exceed fifteen months. IEP does not have a procedure with timeframes addressing these requirements in their procedures manual.

23. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-110(5)(d) requires that casings be leak surveyed within 90 days of discovery of a shorted condition and twice annually thereafter. IEP does not have a procedure with timeframes addressing these requirements in their procedures manual.

24. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-110(3) requires that CP test equipment and instruments be calibrated or checked for accuracy at intervals recommended by the manufacturer.

IEP does not have a procedure with timeframes addressing this requirement in their procedures manual.

25. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

Requires operators to have procedures to ensure that the provisions found under 192.503(a) thru (d) for new segments of pipeline, or return to service segments of pipeline which have been relocated or replaced are met. IEP does not have a procedure addressing these requirements in their procedures manual.

26. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

Requires operators to have procedures to ensure that the requirements of 49 CFR Part 192.507 (a) thru (c) are met for pipelines that operate at a hoop stress less than 30 percent of SMYS and at or above 100 psig. IEP does not have a procedure addressing these requirements in their procedures manual.

27. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-170(1) requires notification in writing, to the commission, at least two business days prior to any pressure test of a gas pipeline that will have a MAOP that produces a hoop stress of twenty percent or more of the SMYS. IEP does not have a procedure addressing this requirement in their procedures manual.

28. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable*

*requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-170(1)(a) requires that in Class 3 or Class 4 locations, as defined in 49 CFR Part 192.5, or within one hundred yards of a building, that a pressure test covered by WAC 480-93-170, must be at least eight hours in duration. IEP does not have a procedure addressing these requirements in their procedures manual.

**Note:**

IEP relocated a segment of pipeline in August 2005. This relocated pipeline segment has an MAOP that produces a hoop stress above 20% of the Specified Minimum Yield Strength and was within 100 yards of a building and this would require a minimum 8 hour pressure test per WAC 480-93-170(1)(a). Records indicate that IEP's pressure test duration for the relocated segment was less than 8 hours in duration.

29. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-170(1)(b) requires that when the test medium is to be a gas or compressible fluid, each operator must notify the appropriate public officials so that adequate public protection can be provided for during the test. IEP does not have a procedure addressing this requirement in their procedures manual.

30. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-170(7)(a-h) requires that records of all pressure tests performed and information listed under 480-93-170(7) (a-h) be maintained for the life of the pipeline. IEP does not have a procedure addressing all of these requirements in their procedures manual.

**Note:**

IEP relocated a segment of pipeline in August 2005. The test pressure documentation did not include all of the required information listed in WAC 480-93-170(7)(a-h).

31. **WAC 480-93-180 (1) Plans and procedures**

- (1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

49 CFR Part 192.614(c)(6) requires follow-up inspection of the pipeline where there is reason to believe the pipeline could be damaged. IEP does not have a procedure addressing this requirement in their procedures manual.

32. **WAC 480-93-180 (1) Plans and procedures**

- (1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

49 CFR Part 192.619(a)(2) requires test pressure to be divided by the applicable factor located in the table in 192.619(a)(2)(ii). IEP procedure 6.09 states that all pressure tests will be 1212 psig and the applicable factor is 1.5 times. This does not support IEP's pipeline MAOP of 811 psig. IEP needs to change the minimum test pressure to 1217 for an 811 psig. IEP does not have a procedure in their manual addressing the requirement that the factor in .619 be used as the basis for the minimum test pressure.

It should also be noted that IEP conducted a pressure test in August of 2005 for a relocated segment of pipeline. The test records indicate that the test pressure dropped to 1170 psig during the test. IEP did not measure the pipeline temperature during the test to determine why the pressure dropped to 1170 and then rose again. The fluctuation is assumed to be temperature related. **The minimum test pressure of 1170 psig divided by the factor of 1.5 gives IEP's pipeline an MAOP of 780 psig.**

33. **WAC 480-93-180 (1) Plans and procedures**

- (1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-015(3) requires that odorant testing equipment be calibrated in accordance with manufacturers recommendations. IEP does not have a procedure addressing this requirement in their procedures manual.

34. **WAC 480-93-180 (1) Plans and procedures**

- (1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-015(4) requires that records be maintained for odorant usage, odorant tests performed and equipment calibration for 5 years. IEP's procedure states a 3 year record retention requirement.

35. **WAC 480-93-180 (1) Plans and procedures**

- (1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-185 requires procedures for the prompt investigation of any notification of a leak, explosion, or fire, that is received from any outside source such as a police or fire department, other utility, contractor, customer, or the general public and that may involve gas pipelines or other gas facilities. IEP's response procedures, section 2.4 in their emergency plan state a leak will be investigated by going to the meter station. **This is not a proper procedure for the prompt response and investigation of leak notifications. Responders should first respond to the source of the odor or leak to ensure adequate public safety. IEP must develop and implement comprehensive procedures for the response to leak notifications.**

36. **WAC 480-93-180 (1) Plans and procedures**

- (1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-185(2) prevents the removal of any suspected gas facility, involved in an incident, until the commission or the lead investigative authority has designated the release of the gas facility. The facility must also remain intact until

directed by the lead investigative authority. IEP does not have a procedure addressing this requirement in their procedures manual.

37. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-185(3) requires that operators take appropriate action and provide notification when leak indications originate from a foreign source. IEP does not have a procedure addressing this requirement in their procedures manual.

38. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-186(3) requires the use of a combustible gas indicator to check the perimeter of a leak area and requires follow-up inspection on repaired leaks no later than thirty days following repair when residual gas is left in the ground. IEP does not have procedures addressing these requirements in their procedures manual. IEP must develop comprehensive procedures for the investigation and evaluation of leaks and the use of leak detection instrumentation.

39. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-187 requires that gas leak records must contain, at a minimum, the criteria outlined in 480-93-187(1-13). IEP's leak record form does not contain all of the required information and IEP does not have procedures in their procedures manual addressing these requirements.

40. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual*

*must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-188(2) requires that gas detection instruments be tested for accuracy at intervals recommended by the manufacturer or monthly not to exceed 45 days. IEP does not have a procedure addressing this requirement in their procedures manual.

41. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-188(5) requires that survey records must be kept for a minimum of five years and contain all of the information required under 480-93-188(5)(a-f). IEP does not have a procedure in their procedures manual addressing the requirement to document the required information.

42. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-124(4) requires that markers reported missing or damaged be replaced within 45 days. IEP procedures do not specify a timeframe for replacement.

43. **WAC 480-93-180 (1) Plans and procedures**

(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

49 CFR Part 192.745(b) requires that any inoperable valve, that might be required during an emergency, have prompt remedial action taken or that an alternative valve be designated. IEP does not have a procedure addressing this requirement in their procedures manual.

44. **WAC 480-93-180 (1) Plans and procedures**  
(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-018(3) requires that records be updated no later than 6 months from completion of construction activity and that they be made available to appropriate personnel. IEP does not have a procedure addressing this requirement in their procedures manual.

45. **WAC 480-93-180 (1) Plans and procedures**  
(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-020(1) requires each operator to submit a written request and receive commission approval prior to operating above 250 psig and 500 psig. IEP has an MAOP of 780 psig but operates at less than 200 psig. IEP would need commission approval to operate above 250 psig. IEP does not have a procedure addressing this requirement in their procedures manual.

46. **WAC 480-93-180 (1) Plans and procedures**  
(1) *Each operator must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the operator's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR Parts 191, 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

**Findings:**

WAC 480-93-170(3) requires that pressure tests be performed on new and replacement pipelines. IEP does not have pressure tests procedures in their procedures manual. IEP should develop comprehensive procedures for the pressure testing of pipelines.

**Note:**

The lack of proper procedures may have affected the proper testing of IEP's relocated pipeline segment in August 2005.

- a) Records indicate that IEP failed to conduct the minimum 8 hour test.



- b) Records indicate that IEP failed to follow the requirements of Part 192.507 by either conducting a leak test at a pressure between 100 psig and the pressure required to produce a hoop stress of 20% of the specified minimum yield strength (SMYS) or by walking the line and checking for leaks while the test pressure is held at approximately 20% of the SMYS.
- c) Records indicate that IEP failed to maintain a minimum test pressure that would support their MAOP of 811 psig when divided by the factor found in the table in Part 192.619(a)(2)(ii).

47. **49 CFR Part 192.491(c)**

- (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.*

**Findings:**

49 CFR Part 192.475(b) requires that whenever any section of pipe is removed from a pipeline for any reason, the internal surface must be inspected for evidence of corrosion. IEP relocated a segment of pipeline in August 2005 and was unable to provide any records that the internal surface was inspected for corrosion.

48. **WAC 480-93-110(3) Corrosion control**

- (3) *Cathodic protection equipment and instrumentation must be maintained, tested for accuracy, calibrated, and operated in accordance with the manufacturer's recommendations. When there are no manufacturer's recommendations, then instruments must be tested for accuracy at an appropriate schedule determined by the operator.*

**Findings:**

IEP has not checked half cells for accuracy as recommended by the manufacturer. IEP has checked their volt meters but has not maintained records to prove compliance. No schedules are dictated in IEP's procedures manual.

**AREA OF CONCERN**

- 1) IEP does not always record the actual dates of maintenance activities such as annual CP reads, valve surveys or rectifier maintenance. Records indicate that in many cases just the month the work was performed is recorded.

IEP must record the actual dates that the work was performed.