Mt. Vernon Terrace Apts.
3106 S Mt. Vernon #17
Spokane WA 99223
Phone # 536-1168

March 17, 2011

Response to the letter dated 02/4/2011.
Thank you for the extension. I am sending updated O &M manual and I hope I am covered everything that required. Also, I am sending you Avista report for inspection.

Thank you

Irina Robison-owner

Training for

OPERATION & MAINTENANCE of

GAS DISTRIBUTION SYSTEM at

Mt. Vernon Apartments, Spokane Washington

1. THE SYSTEM IS AS SHOWN ON THE MAP ATTACHED

2. THE SERVICE AT THE LAUNDRY BUILDING INCLUDING THE METER BELONGS TO THE WASHINGTON WATER POWER Co. - THEY WILL OPERATE & MAINTAIN IT.

3. THE DISTRIBUTION PIPING FROM THE 4" LUBRICATED PLUG COCK VALVE JUST BEYOND THE METER TO EACH APARTMENT BUILDING SHALL BE MAINTAINED ACCORDING TO THIS INSTRUCTION:

GENERAL INSTRUCTION:
Do not fiddle with or adjust the System. The System will be checked by a specialist once a year. He will make any neccessary adjustments to the system. Goodale & Barbieri will order this inspection.

EMERGENCY INSTRUCTION:
In the event of Fire, Earthquake, or other Disaster that threatens or has caused a Gas Leak, Shut Off the valve at the Regulator Station at the individual Apartment Building, or if the entire system is threatened shut off the 4" Lube Plug Valve at the Meter.

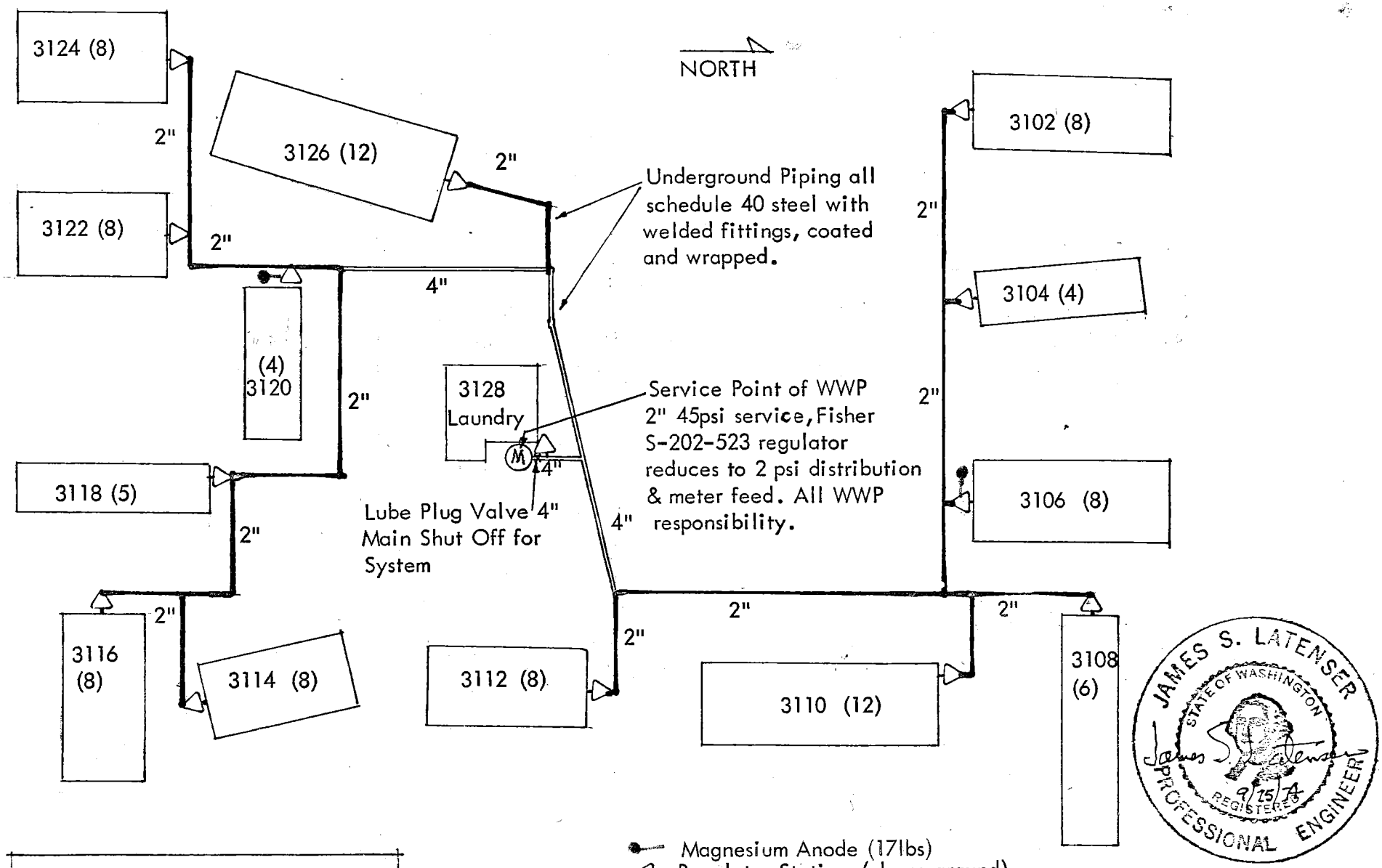
SERVICE INSTRUCTIONS:
Allow no one to Service any Gas Piping unless that person has a City of Spokane Gas Fitters Certificate.

Training completed by
Irina Robison
Anatoliy Kirichenko 03/02/11

THIS INSTRUCTION AND THE ATTACHED MAP IS ON FILE WITH:

Mt Vernon Terrace apt #17 office

Washington Utilities and Transportation Commission
1300S. Evergreen Park Dr.,Olympia,WA



GAS DISTRIBUTION SYSTEM
Mt Vernon Apartments
Mt Vernon St. between 31st & 32nd
Spokane Washington

Magnesium Anode (17lbs)

Regulator Station (above ground):
2"underground feed up to 2" lockable Plug Valve, Fisher 1¼" S302 Service Regulator (2 psi to 7") dielectric union, drip leg, then into building

31XX Street Number on Mt Vernon Street

(X) Number of Apartments in building

JAMES S. LATENSER
STATE OF WASHINGTON
James S. Latenser
9/25/74
REGISTERED
PROFESSIONAL ENGINEER

#1a #1d.

Washington State reports each year no later than March 15th for the preceeding year with the UTC in accordance with WAC 480-93-200. Reporting forms are available on the UTC web site.

(a) Prevention Statistics report must include in detail the following information:
  (i) Number of gas-related one-call locate requests completed in the field;
  (ii) Number of third-party damages incurred; and
  (iii) Cause of damage, where cause of damage is classified as one of the following:
    (A) Inaccurate locate;
    (B) Failure to use reasonable care;
    © Excavated prior to a locate being conducted; or
    (D) Excavator failed to call for a locate.

(b) A report detailing all construction defects and material failures resulting in leakage. Each Master Meter System system must categorize the different types of construction defects and material failures anticipated for their system. The report must include the following:
  (i) Types and numbers of construction defects; and
  (ii) Types and numbers of material failures.

© Each Master Meter System must file with the commission, and with appropriate officials of all municipalities where gas pipeline companies have facilities, the names, addresses, and telephone numbers of the responsible officials of the Master Meter System who may be contacted in the event of an emergency. In the event of any changes in such personnel, the Master Meter System shall immediately notify the commission and municipalities.

(d) When a Master Meter System is required to file a copy of a DOT Drug and Alcohol Testing Management Information System (MIS) Data Collection Form with the PHMSA , Office of Pipeline Safety, the Master Meter System must simultaneously submit a copy of the form to the commission.

PUBLIC AWARENESS

Unless the operator transports gas as a primary activity, the operator of a Master Meter System or petroleum gas system is not required to develop a public awareness program as prescribed in paragraphs (a) through (g) of CFR 192.616. Instead the operator must develop and implement a written procedure to provide its customers public awareness messages twice annually. If the Master Meter System or petroleum gas system is located on property the operator does not control, the operator must provide similar messages twice annually to persons controlling the property. The public awareness message must include:

(1) A description of the purpose and reliability of the pipeline;
(2) An overview of the hazards of the pipeline and prevention measures used;
(3) Information about damage prevention;

#1 a

This Master Meter System belongs to the Inland Empire locating One Call council for Damage Prevention. Documentation of locates requested and completed is found in office (location). toss on that don't apply

All Natural gas operators are encouraged to belong to Virtual Dirt. The web site is https://identity.damagereporting.org/cgareg/control/login.do.

REPAIR METHODS – PLASTIC AND METAL

Repairs will only be completed by persons with training and experience including Operator Qualification certification. If such personnel are not available, arrangements will be made with a qualified gas contractor or gas company to perform such work. All work will comply with Title 49, CFR Part 192 and WACs. Records should be maintained for all repairs made to the Master Meter System for the life of the system.

PURGING

Purging will only be completed by persons with training and experience including Operator Qualification certification. If such personnel are not available, arrangements will be made with a qualified gas contractor or gas company to perform such work. All work will comply with Title 49, CFR Part 192.

MAXIMUM ALLOWABLE OPERATING PRESSURE (MAOP), OPERATING PRESSURE, AND PRESSURE TEST REQUIREMENTS

Each new, replacement, reinstated, repaired or uprated pipe will be subjected to the pressure test required in accordance with 49 CFR 192 prior to being filled with gas and put into service.
The Master Meter System's established Maximum Allowable Operating Pressure is 40 psig.
The Master Meter System's established Operating Pressure(s) is 2 psig.
The Master Meter System pressure test documentation is found in letter 12/3/873 (location) next page and includes the as built drawings. This includes pressure tests for new construction and repairs.

MASTER METER SYSTEM MAPS 480-93-018

Each Master Meter System must update its records (this includes maps) within six months of when it completes any construction activity and make such records available to appropriate company operations personnel. System maps shall be detailed and include the location, length, size, type of pipe, and pipeline components. This Master Meter System map is found in the Map section of this manual

ANNUAL REPORTS

Master Meter System Owners are exempt from 192.11, filing a PHMSA Form RSPA F 7100.1. However, Master Meter Systems are required to file the following

(b) Survey results;
© Survey method;
(d) Name of the person who performed the survey;
(e) Survey dates; and
(f) Instrument tracking or identification number.

(6) This Master Meter System performs self audits of the effectiveness of its leak detection and recordkeeping programs. Each Master Meter System shall maintain records of the self audits for five years. Self audits shall be performed as frequently as necessary, but not to exceed three years between audits. At a minimum, self audits should ensure that:
(a) Leak survey schedules meet the minimum federal and state safety requirements for gas pipelines;
(b) Consistent evaluations of leaks are being made throughout the system;
(c) Repairs are made within the time frame allowed;
(d) Repairs are effective; and
(e) Records are accurate and complete.

VALVE MATINTENACE ON DISTRIBUTION SYSTEM

Emergency valves in the Master Meter System shall be inspected, operated and lubricated (if necessary) at intervals not exceeding 15 months, but at least once each calendar year. The Master Meter System shall have a written valve maintenance program detailing the valve selection process.

This Master Meter System has

- 1 total number of valves includes steel and plastic valves. Avista's downstream meter valve
- 0 number of distribution valves on underground pipe located at
  1. _____
  2. _____
- 0 number of High Occupancy Structure valves located at
  1. _____
  2. _____
- 14 number of ~~meter~~ service valves located at
  1. each building's service regulator
  2. _____
- The Master Meter System shut off valve is located at Bldg 3128 (the Master Meter System meter owned by local utility).

CORROSION (WAC 480-93-110 and CFR 192 subpart M 192.400)

Master Meter Systems with steel pipe shall have a cathodic protection system.

This Master Meter System has an **anodic** or a **galvanic** (circle one) system.

Each Master Meter System that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of -.850 in accordance with CFR 192.465 (a)

Each Master Meter System must complete remedial action within ninety days to correct any cathodic protection deficiencies known and indicated by any test, survey, or inspection in accordance with WAC 480-93-110 (2).

Each cathodic protection rectifier or other impressed current power source must be inspected six times each calendar year, but with intervals not exceeding 2 1/2 months, to insure that it is operating in accordance with 192.465 (b). This Master Meter System **does** or **does not** (circle one) have a rectifier system.

Each Master Meter System must conduct Atmospheric Corrosion Inspections once every three years not to exceed 39 months. During inspections the operator must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water.

PATROLLING

Master Meter Systems shall at intervals not exceeding 7 1/2 months, but at least twice each calendar year conduct patrols of their system. A patrol includes but is not limited to excavation, grading, and any activity that would result in damage to the pipe, loss of support due to settlement or shifting of soil around the pipe, undermining or damage to pipe supports, loss of cover or excessive fill.

DAMAGE PREVENTION

In accordance with WAC 480-93-250, Master Meter Systems must comply with chapter 19.122 RCW. At a minimum, Master Meter System Owners must

(1) Subscribe to the appropriate one-number locator service;

(2) Provide, upon receipt of locate notice, reasonably accurate information as to its locatable underground facilities by surface-marking the location of the facilities;

(3) Respond with locate markings within two business days after receipt of the notice or within a time mutually agreed upon between the operator and the excavator requesting the utility locate information.

A copy of RCW 19.122 is found in Appendix B of this manual

Attachment A: Identified Covered Tasks

The following tasks performed on {INSERT MM ACRONYM}'s pipelines have been evaluated and found to pass the four-part test to be covered tasks subject to the Operator Qualification (OQ) Rule:

CONSTRUCTION pj ADD WAC FOR NEW CONSTRUCTION

While construction tasks, by definition, cannot be covered tasks subject to the OQ Rule, some maintenance tasks listed in this section may also be performed in the course of construction activities and will be covered when performed in such circumstances. {INSERT MM ACRONYM}, however, shall evaluate all construction tasks and determine the appropriate operator qualifications as detailed in section 7.2.

CORROSION CONTROL COVERED TASKS

SIF 0001	Measure Structured-to-electrolyte Potential
SIF 0101	Inspect Rectifier and Obtain Readings
SIF 0141	Visual Inspection for Atmospheric Corrosion
SIF 0151	Visual Inspection of Buried Pipe and Components When Exposed
SIF 0201	Visual Inspection of Installed Pipe and Components for Mechanical Damage

Pipe-to-soil read will be taken every time a pipe is exposed and the coating removed.

LEAK INVESTIGATION COVERED TASKS

Remedial action will be taken within 90 days.

SIF 1231	Inside Gas Leak Investigation
SIF 1241	Outside Gas Leak Investigation

DAMAGE PREVENTION COVERED TASKS

SIF 1291	Locate Underground Pipelines
SIF 1031	Install and Maintain Pipeline Markers
SIF 1321	Damage Prevention During Excavation Activities by or on Behalf of the Operator
SIF 1331	Damage Prevention Inspection During Third-Party Excavation or Encroachment Activities as Determined by the Operator

ODORIZATION COVERED TASKS

SIF 1211	Odorization – Periodic Sampling

TAPPING AND STOPPING COVERED TASKS

SIF 1101	Tapping a Pipeline with a Built-in Cutter
SIF 1141	Squeeze Off Plastic Pipe

OPERATIONS AND MAINTENANCE MANUAL

Each Master Meter System shall have and follow a gas pipeline plan and procedure manual (O&M) for operation, maintenance, inspection, and emergency response activities that are specific to the Master Meter System. In accordance with 480-92-180, the manual must be written in detail sufficient for a person with adequate training to perform the tasks described. For example, a manual should contain specific, detailed, step-by-step instructions on how to maintain a regulator or rectifier, conduct a leak survey or conduct a pressure test.

In order to assist Master Meter System Owners with compliance, the UTC is providing this guidance Manual. This guidance manual contains most of the plans and procedures that require specific, detailed, step by step instruction and are necessary for meeting the majority of the applicable requirements of 49 CFR §§ 191, 192 and chapter 480-93 WAC. When the Master Meter System Owner uses a contractor, the Master Meter System Owner may adopt the contractor's specific, detailed, step-by-step instructions. All of the contractor's applicable information shall be on file with the Master Meter System Owner i.e. Operator Qualification, Drug and Alcohol testing, written procedures used by the contractor and the contractor's documentation.

#19 This manual shall be reviewed and updated at intervals not exceeding 15 months, but at least one each calendar year in accordance with CFR 192.605 (a). Appropriate parts of the manual shall be kept at locations where operations and maintenance activities are conducted. The Following are manual locations 1. office 2. _____

#11 **RECORDS**

The Master Meter System Owner shall maintain records sufficient to demonstrate compliance with all requirements of 49 CFR §§ 191, 192 and chapter 480-93 WAC and 480-93-018(4). Records will be maintained and readily available on all new pipe system installations, repairs and/or changes to existing piping systems in sufficient detail to provide historical information, physical location, design ratings, and any other pertinent data required by the rules and regulations and necessary for the safe and continuous operation and maintenance of the system. Each Master Meter System Owner shall maintain a list of forms and data bases, including examples where applicable, that specify what records the company maintains. Each Master Meter System must make this list available to the commission upon request.

Each Master Owner shall update its records (including maps) Repairs will only be completed by persons with training and experience including Operator Qualification certification. If such personnel are not available, arrangements will be made with a qualified gas contractor or gas company to perform such work. All work will comply with Title 49, CFR Part 192 and WACs. Records should be maintained for all repairs made to the Master Meter Systems for the life of the system.

Within six months of when the Master Meter System completes any construction activity and make such records available to appropriate company operations personnel.

ODORATION

Master Meter System Owners may have written verification from their gas source that the gas has the proper concentration of odorant in accordance with WAC 480-93-015. This written verification shall be made available to the UTC upon request.

LEAK SURVEYS

All Master Meter System Owners will conduct leak surveys in accordance with WAC 480-93-188

(1) – (6). For areas outside business districts a leak survey is required every five years. For High Occupancy Structures leak surveys are required annually. Documentation of Leak surveys is kept Office (location). and Ray Allen's files.

This Master Meter System Facility conducts the following leak surveys.

a. Annual leak survey all underground and external piping
b. _____
c. _____

(1) The Master Meter System must perform leak survey(s) over all underground and external piping. A gas leak survey will be conducted within all buildings where gas leakage has been detected at the outside wall, at locations where escaping gas could potentially migrate into and accumulate inside the building.

(2) This Master Meter System calibrates and maintains (for itself and its contractors), tests for accuracy, calibration records and operates them in accordance with the manufacturer's recommendations. If there are no written manufacturer's recommendations or schedules, then the Master Meter System Owner shall test such instruments for accuracy at least monthly, but not to exceed forty-five days between testing, and at least twelve times per year. The Master Meter System recalibrates or removes from service any instrument that does not meet applicable tolerances. Records of accuracy checks, calibration and other maintenance performed shall be maintained for five years.

(5) Each Master Meter System shall keep leak survey records for a minimum of five years. At a minimum, survey records shall contain the following information:

(a) Description of the system and area surveyed (including maps and leak survey logs);

This Master Meter System has an **anodic** or a **galvanic** (circle one) system.

#19 Each Master Meter System that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of -.850 in accordance with CFR 192.465 (a)

Each Master Meter System must complete remedial action within ninety days to correct any cathodic protection deficiencies known and indicated by any test, survey, or inspection in accordance with WAC 480-93-110 (2).

Each cathodic protection rectifier or other impressed current power source must be inspected six times each calendar year, but with intervals not exceeding 2 1/2 months, to insure that it is operating in accordance with 192.465 (b). This Master Meter System **does** or **does not** (circle one) have a rectifier system.

Each Master Meter System must conduct Atmospheric Corrosion Inspections once every three years not to exceed 39 months. During inspections the operator must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water.

#17 **PATROLLING**

Master Meter Systems shall at intervals not exceeding 7 1/2 months, but at least twice each calendar year conduct patrols of their system. A patrol includes but is not limited to excavation, grading, and any activity that would result in damage to the pipe, loss of support due to settlement or shifting of soil around the pipe, undermining or damage to pipe supports, loss of cover or excessive fill.

DAMAGE PREVENTION

In accordance with WAC 480-93-250, Master Meter Systems must comply with chapter 19.122 RCW. At a minimum, Master Meter System Owners must

(1) Subscribe to the appropriate one-number locator service;

(2) Provide, upon receipt of locate notice, reasonably accurate information as to its locatable underground facilities by surface-marking the location of the facilities;

(3) Respond with locate markings within two business days after receipt of the notice or within a time mutually agreed upon between the operator and the excavator requesting the utility locate information.

A copy of RCW 19.122 is found in Appendix B of this manual

(3)

December 3, 1973

Mr. John Tolle
E. 10404 Jackson
Spokane, Washington 99206

Re: Morayo Development
99 South Garden Apartments
Gas System Corrosion Survey

Dear Mr. Tolle:

As per our telephone conversation of November 30, 1973, a field survey was made at the 99 South underground gas piping system. This system distributes natural gas from The Washington Water Power Company gas meter to 14 separate buildings.

The underground system consists of; 45'-1½", 1025'-2" and 440'4" of 3M-Scotchkoted steel pipe; welded joints; pressure tested at 60 psi.

I was able to obtain an electronic flame ionization leak detection unit, so in addition to a corrosion survey I made a leakage survey of all underground piping. There were no leak indications from this survey.

The following corrosion survey field data was taken:

Building	Pipe-to-Soil Potential Volts	Soil Resistivity ohms/cubic centimeter
3114	.75	72,000
3116	.70	48,000
3118	.75	54,000
3120	.83	56,000
3122	.93	73,600
3124	.78	54,800
3126	.76	52,000
3128	.64	24,800
3112	.63	76,800
3110	.70	56,000
3108	.67	72,000
3106	.63	67,200
3104	.69	77,600
3102	.63	54,400

10a

Conclusion: The pipe-to-soil potentials are readings expected for new buried coated pipe. The soil resistivity is high and indicates a lightly corrosive condition. However the sub-soil is decaded basalt rock and has a very high soluble sulfate content. The high soluble sulfate content and very poor surface water drainage in the area combine to indicate corrosion caused leakage can be expected within a 10 year period.

The following procedure is recommended to be filed with the State Public Utilities Commission to implement a corrosion control plan (paragraph "f"):

1. Install an insulating union in the gas piping at each building riser.
2. Clear all underground contacts.
3. Determine the cathodic protection current requirement.
4. Install the necessary cathodic protection anodes.
5. Make an annual cathodic protection survey to assure protection is maintained.
6. Make leakage survey of piping every 5 years.

I would also like to mention that I am available for making periodic operating pressure inspections -- paragraph "e".

Sincerely yours,

Ray Allen, P.E.
Corrosion & Gas System Engineer

E. 328 Augusta Avenue
Spokane, WA 99207

Tel. 328-4192

RAA:d

MT. VERNON APARTMENTS
3118 S Mt. Vernon, Spokane, WA 99223

1 h

MASTER METER GAS SYSTEM
EMERGENCY PLAN

INTRODUCTION

This manual has been prepared to provide emergency response personnel with data essential in responding to a natural gas emergency incident. The emergency response personnel have received proper training for their assignments and they know their job responsibility. Action will be directed toward protecting people first and then property. When in doubt, the Fire Department and Avista Corp. will be called.

DEFINITION OF EMERGENCY INCIDENT

An "emergency" condition exists when the operator or a responsible person has declared that extraordinary procedures, equipment, manpower, and supplies must be employed to protect the public and or any property form existing or potential hazard. These hazards will include, but are not limited to the following:

Any incident, which results in:

1. Underpressure in the gas system.
2. Overpressure in the gas system.
3. Large volumes of uncontrolled escaping gas.
4. Fire, ignition, or explosion.
5. Any natural disasters such as floods, tornadoes, earthquakes, or other severe forces of nature which make emergency provisions necessary.
6. Any hazardous Grade 1 leak. This leak represents an existing or probable hazard to persons or property and requires immediate repair or continuous action until the conditions are no longer hazardous. A hazardous leak will include, but not limited to, the following:
    a. Any leak that, in the judgment of the operating personnel at the scene, is regarded as an immediate hazard.
    b. Any indication of gas, which has migrated into or under a building, or into a tunnel.
    c. Any gas reading at the outside wall of a building or where gas would likely migrate to an outside wall of a building.
    d. Any gas reading of 80% lower explosive limit (L.E.L.) (3% gas in air) or greater in a confined space.
    e. Any gas reading of 80% L.E.L. (3% gas in air) or greater in small substructures (other than gas associated substructures) from which gas would likely migrate to the outside wall of a building.

f. Any leak that can be seen, heard, or felt, and which is in a location that may endanger the general public or property.

GAS ODOR / LEAK REPORT

The first employee receiving a report of a gas leak or odor will complete a leak report form #3 and/or #4.

All reports of leaks on our premises will receive priority with top priority going to a reported leak inside a building.

If it is determined that a hazardous gas leak may exist inside a building, the occupant should be advised to:

1. Evacuate all occupants of the structure to a safe distance.
2. Do not operate any electric switches or appliances.
3. Do not use phone inside building.
4. Do not us matches, cigarettes, or other possible sources of ignition

Any strong odor of gas inside a building must be assumed to be hazardous.

An employee or operator will be dispatched immediately to the location of the reported leak to make an evaluation and shut off service valves, main valves, or master meter valves if necessary.
Also:

1. Call Fire Department, 911, if necessary.
2. Call Avista Corp., 800-227-9187 if necessary.
3. Call Washington Utilities and Transportation Commission (WUTC) Pipeline Safety Section, (See Attached List), if any of the conditions noted on page 6 exist.

GAS LEAK: INSIDE BUILDING

The first employee to arrive at the scene of a gas leak shall take every corrective action necessary to protect life and property.

If the presence of a dangerous concentration of gas is indicated by a strong odor or by the use of a combustible gas indicator, proceed as follows:

1. Assess danger to public, surrounding building occupants, and property.
2. Evacuate the involved buildings immediately.
3. Do not operate any electrical switches or appliances.
4. Do not use the phone inside the building.

5. Shut off gas service valve, main valves (only if valves exist), or master meter valves, if necessary.
6. Notify Avista Corp.
7. Notify Fire Department.
8. Notify responsible persons.
9. Implement checklist – see page 3.
10. Occupants may return to buildings, but only after you are positively sure it is safe to do so.

GAS LEAKS OUTSIDE AND FIRE, EXPLOSION, GAS IGNITION, NATURAL DISASTER, OR CIVIL DISTURBANCE

The first employee to arrive at the scene of a gas leak, fire, explosion, gas ignition, natural disaster, or civil disturbance shall take every corrective action necessary to protect life and property.

The employee shall:

1. Assess danger to public, surrounding building occupants, and property.
2. If necessary, evacuate and/or assist all persons to safety.
3. If necessary, notify Fire and Police Departments, ambulances and Avista Corp.
4. If it is determined that a hazardous condition may exist, turn off gas supply at service valve, main valves, or master meter valves.
5. Notify responsible persons.
6. If necessary, blockade the area.
7. Complete checklist - below.

CHECK LIST

_____Has Fire Department been called?

_____Has Avista Corp. been called?

_____Have persons been evacuated and area blocked?

_____Has the Police Department been notified?

_____Has WUTC Pipeline Safety Section been notified?

_____Has the repair crew been notified?

_____Has the telephonic report been executed?

_____Has electrical utility been called for power shut off to the area, if appropriate?

_____Have emergency valves or proper valves shut down?

_____Has leak been eliminated and gas supply shut off or brought under control? If an area has been cut off from a supply of gas, has the individual service of each building been shut off?

_____Is the situation under control and has the possibility or reoccurrence been eliminated?

SAFETY CONSIDERATIONS

Determine if hazardous leak exists. We will grade all leaks as hazardous (Grade 1) or non-hazardous Grade 2 or 3. We may have to immediately call for assistance.

1. If gas is found in ground, call the Fire Department, Avista Corp. and Ray Allen, 509-467-3911.
2. Do not rely on your sense of smell to determine if gas is present in a building or in the ground. Instruments must be used for this. When in doubt, call for assistance.
3. Do not enter the building if it is unsafe.
4. All "Grade I leaks" are hazardous leaks.

EMERGENCY SHUTDOWNS / PRESSURE REDUCTIONS

Emergency shutdown may be needed when there is a failure in gas company regulator station or metering equipment freezing or malfunctioning of regulators or meters, or a line break caused by construction work, pipe failure, etc.

1. The proper valves must be closed to isolate the affected areas (where applicable).
2. Gas must not be turned on into the system affected where an outage occurs until all service riser valves have been shut off.
3. Call Emergency personnel as may be deemed necessary.

RESTORATION OF SERVICE DUE TO OUTAGE

When the supply of gas has been cut off to the complex, no gas will be turned on until the individual service to each building has been turned off.

A building-to-building operation is mandatory. The individual service of each building must be turned off at the service valves. In restoring service to a building all gas piping must be purges and appliance relit (see 0 & M Procedures).

The person in charge is to coordinate this operation and be responsible for purging and the safe restoration of all gas service.

A complete record of the incident, with drawings, pressure test, etc., shall be kept on file (see 0 & M Procedures).

EMPLOYEE TRAINING

At least once per year, and periodically as needed, an employee meeting shall be scheduled to discuss and train employees in natural gas emergency procedures. The operator or his designee shall coordinate this training. Occasionally, training should be by a qualified "Master Meter Service Provider".

The Employee training and discussion shall include, but may not be limited to the following:

1. Location of emergency manual.
2. Review of emergency manual procedures (employee responsibility).

3. Review the location and use of emergency equipment.
    a. Key for the fence gate lock around Avista meter set.
    b. 14" pipe wrench for closing the Emergency Response Valve.
4. Review the locations and use of the:
    a. System map.
    b. Emergency Response Valve.
5. Review method of calling for assistance.
6. Update call list.
7. Properties of natural gas.
    a. Natural gas is **colorless and odorless** unless a distinctive odorant is added.
    b. Natural gas is **lighter than air** and will diffuse rapidly.
    c. Natural gas is **neither toxic nor poisonous**, but can cause suffocation in a confined space due to lack of oxygen.
    d. Natural gas **will burn when mixed with air** and ignited. Escaping gas can be ignited by open flames or sparks from electrical switches and motors, ignition systems, mechanical equipment and flying rocks.
8. Odorization requirement.
9. Record keeping (documentation).

Record shall be kept on file of attendance and items discussed at each meeting.

PUBLIC EDUCATION

Our continuing education program to enable the public, occupants, and excavators in recognizing a natural gas pipeline emergency for the purpose of reporting it to the master meter operator, Fire Department, or Avista Corp.

The program shall include, but may not be limited to the following:
Before any excavations on Mt. Vernon Apts. property are started the following has been done:

1. A call to ONE-CALLCENTER 811 has been made.
2. The Plant Manager/Assistant has reviewed with the excavator his scope of work.
3. The excavator is made familiar with:
    a. The underground gas system
    b. Recognition of gas odors
    c. Information about gas properties
    d. Report an emergency to the Plant Manager/Assistant
    e. What to do and not to do when there is a strong gas odor
4. A record made of the above activities.

LIAISON WITH PUBLIC OFFICIALS

Liaison shall be established with fire, police, and WUTC Pipeline Safety Section.

Notification shall be sent to the appropriate officials to acquaint them with the master meter emergency capabilities and procedures concerning pipeline gas emergencies. The operator or responsible person will learn the capability and responsibility of each government organization that may respond to a natural gas emergency.

The Fire Department will be advised of the location of all emergency valves and the location of the gas pipeline. The operator or responsible person will participate in fire, police, and WUTC Pipeline Safety Section meeting where appropriate.

The operator or responsible person will implement and coordinate this program.

A record shall be maintained of all meetings, training sessions, and other related activities.

TELEPHONIC REPORTS TO THE WASHINGTON UTILITIES & TRANSPORTATION COMMISSION

Gas pipeline incidents that occur must be reported to the office of Pipeline Safety by the person in charge, or whosoever the operator designates, provided that the incident meets one of the requirement listed below:

Federal Requirements

1. An event that involves a release of gas from a pipeline and:
    a. Results in a death, or personal injury necessitating in-patient hospitalization; or
    b. Causes estimated property damage, or $50,000 or more.
2. An event that is significant, in the judgment of the operator, even though it did not meet the criteria above.

WUTC Requirements

1. Release of natural gas which:
    a. Caused a death or a personal injury requiring hospitalization.
    b. Resulted in gas ignition, explosion, or fire.
    c. Causes estimated total damage in excess of $5,000 (total of operators damage, damage to others, and cost of gas loss).
2. Any news media inquiry.
3. A significant incident, in the judgment of the operator, even though it does not meet the above criteria.

The telephone report to WUTC should contain:

1. Name of operator and reporting party.
2. Reporting party's title and telephone number.
3. The location, time, and date of incident,
4. Fatalities and personal injuries.

5. All other significant known facts that are relevant to the cause of the leak or extent of the damages. (Describe accident)
6. Who in management should be contacted upon arrival at incident site.

The telephonic report, if required, should be made within 2 hours of occurrence but in no case later than six hours after the discovery. It must be reported to WUTC (See Attached List)

A written report shall be filed with WUTC.

EMERGENCY CALL LIST

Fire Department - 911
Police Department - 911
Avista Corp. - 800-227-9187
Washington Utilities & Transportation Commission -888-321-9146
Ray Allen, Gas Engineer - 509 467-3911

EMERGENCY EQUIPMENT

We are responsible for the adequacy, availability and condition of emergency equipment.

Inspection of emergency equipment will be conducted quarterly or as often as may be necessary, and records of these inspections will be kept on file.

The emergency equipment will include, but is not limited to, valve wrenches, shoves, and fire extinguishers (20 lb.).

All emergency equipment is listed and located as follows:

CONTRACTOR EMERGENCY CALL LIST

Contractor's name: Avista Corp.
Address: 1411 E Mission, Spokane, WA 99202
24 hour telephone number: 509-489-6104

INSERT MAP OF DISTRIBUTION SYSTEM

Include location of:

- Gas main lines
- Gas service lines
- Emergency Valves
- Master meter
- Buildings and reference points

INVESTIGATION OF FAILURES

1. Report incidents or failures to WUTC by telephone within six hours of occurrence.
2. Management will minimize failures by conducting audits on maintenance and installation procedures. Management will also conduct an investigation to determine cause of failure and to minimize the possibility of recurrence.

Raymond A. Allen
Master Meter Service Operator
Raymond A. Allen, P.E.

Mt. Vernon Apartments Manager

9-21-10

(2) (1) b,c

3. Review the location and use of emergency equipment.
4. Review the locations and use of the:
   A. System maps.
   B. Emergency valves.
5. Review method of calling for assistance.
6. Update call list.
7. Properties of natural gas.
8. Record keeping (documentation). Record shall be kept on file of attendance and items discussed at each meeting.

LIAISON WITH PUBLIC OFFICIALS

Liaison shall be established with local gas Distribution Company, Fire, Police, and UTC Pipeline Safety Program.

Notification shall be sent to the appropriate officials to acquaint them with the Master Meter System emergency capabilities and procedures concerning pipeline gas emergencies. The operator or responsible person will learn the capability and responsibility of each government organization that may respond to a natural gas emergency. The responsible person for this Master Meter System is Dina Robeson

The Fire Department will be advised of the location of all emergency valves and the location of the gas pipeline map. The operator or responsible person will participate in fire, police, and UTC Pipeline Safety Program meeting where appropriate.

The operator or responsible person will implement and coordinate this program.

A record shall be maintained of all meetings, training sessions, and other related activities.

TELEPHONIC REPORTS TO THE WASHINGTON UTILITIES & TRANSPORTATION COMMISSION

Gas pipeline incidents that occur must be reported to the office of Pipeline Safety by the person in charge, or whosoever the operator designates, provided that the incident meets one of the requirements listed below:

Federal Requirements:

A. An event that involves a release of gas from a pipeline and

   1. Results in a death, or personal injury necessitating in-patient hospitalization; or
   2. Causes estimated property damage, of $50,000 or more.
   3. An event that is significant, in the judgment of the operator, even though it did not meet the criteria above.

For all Federal Reportable incidents telephonic notice is required to the National Response Center **(800-424-8802)**

UTC Requirements:
A telephonic report should be made within 2 hours of occurrence for the following . It must be reported to WUTC (See Attached Emergency Call List). **1-888-321-9146**

A. Release of natural gas which:
   1. Caused a death or a personal injury requiring overnight hospitalization.
   2. Resulted in gas ignition, explosion, or fire.
   3. Causes estimated total damage in excess of $50,000 (total of operators damage, damage to others, and cost of gas loss).
   4. The evacuation of a building, or a high occupancy structure or area;
   5. The unintentional ignition of gas;
   6. The unscheduled interruption of service furnished by any Master Meter System to twenty-five or more distribution customers;
   7. 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; or if the MAOP is 12 p.s.i. gage, but less than 60 p.s.i.gage, the pressure may not exceed the MAOP plus 6 p.s.i. gage;
   8. A significant occurrence, in the judgment of the Master Meter System, even though it does not meet the criteria of (a) through (g) of this subsection.

A telephonic report should be made within 24 hours of occurrence for the following . It must be reported to WUTC **1-888-321-9146**

A. The uncontrolled release of gas for more than two hours;

B. The taking of a high pressure supply or transmission pipeline or a major distribution supply gas pipeline out of service;

C. A gas pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or

D. A gas pipeline pressure exceeding the MAOP.

The telephone report to WUTC should contain:
1. Name of operator and reporting party.
2. Reporting party's title and telephone number.'
3. The location, time, and date of incident.
4. Fatalities and personal injuries.
5. All other significant known facts that are relevant to the cause of the leak or extent of the damages. (Describe accident)
6. Who in management should be contacted upon arrival at incident site.

A written report shall be filed with WUTC written report within thirty days of the initial telephonic report. The written report shall include the following
1. Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged;

2. The extent of such injuries and damage;
3. A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report;
4. A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved;
5. The date and time the Master Meter System was first notified of the incident;
6. The date and time the Master Meter System's first responders arrived on'site;
7. The date and time the Master Meter System was made safe;
8. The date, time, and type of any temporary or permanent repair that was made;
9. The cost of the incident to the Master Meter System;
10. Line type;
11. City and county of incident; and
12. Any other information deemed necessary by the commission.

EMERGENCY CALL LIST

Fire Department:	911
Police Department:	911
Gas supply company: Avista	1800-227-9187
Operator personnel:	
Washington Utilities & Transportation Commission	(888) 321-9146
National Response Center	(800) 424-8802

MASTER METER SYSTEM EMERGENCY CALL LIST

Contractor's name: Avista
Address: 1411 E Mission Ave Spokane, WA 99252-0001
24 hour telephone number: 1800-227-9187

INVESTIGATION OF FAILURES

1. Report incidents or failures to WUTC by telephone within two hours of occurrence.

2. Management will minimize failures by conducting audits on maintenance and installation procedures. Management will also conduct an investigation to determine cause of failure and to minimize the possibility of recurrence.

March 16, 2011

To: Ms. Robison, Mt. Vernon Terrace Apartments
Fax 509-[illegible]

From: Kris Busko, Gas Engineer
509-495-8767

2 Pages:

This Fax Cover Sheet
Regulator Station Inspection and Maintenance Record

Ms. Robison,

Attached please find a copy of the maintenance record for the meter set (we last visited September 28, 2010 and found the meter in good working order).

I have asked our technician for a copy of the odorant reads for Spokane and will fax that record as soon as I get it. I provided both the odor reads the maintenance record last fall to Ray Allen. These latest records are the updated versions showing the status of things since that time.

I am e-mailing Patricia Johnson of the WUTC to let her know I am providing these records to you and will ask her to be in touch with you about the confusion on the audit report, especially regarding the drug and alcohol requirements you see there.

Thank you,

Kris Busko

Station # MS 4 27E

REGULATOR STATION INSPECTION AND MAINTENANCE RECORD

Location: [illegible] MT VERNON TERRACE City SPOKANE

Station type: [illegible] Map # _____ EOP Zone _____ Worker Monitor: ☐ Yes ☒ No

#1: Max Regulator Set Point 2# PSIG — BYPASS - YES — INLET: MAOP 60 PSIG
Max Relief Set Point 4# PSIG — 5 YR REPAIR - 2008 — MOP _____ PSIG
#2: Max Regulator Set Point _____ PSIG — OUTLET: MAOP 5 PSIG
Max Relief Set Point _____ PSIG — AL5000TC #555200 B (RR) — MOP _____ PSIG

REGULATORS

Reg. No	Size & Make	Type	Body	Orifice Size	Type of Inner Valve	Pilot Type	Loading Spring
1	2" FISHER	289H	2"x2"	1/2"	Reg 2009		

RELIEF VALVE

Size & Make	Type
2" FISHER	289H

Station

Date	By	Clean Sign Prot	Paint OK	Sta' Flt'	Leaks	Inlet Press	Reg #	Press Set Found	Press Set Left	Lock-up Pressure	Seats	Orifice	Pilot	Pilot Flt'	Sta'nd Head	Leak Test
10-6-06	FJV	OK	T	NA	OK	53.7#	1	2.05#	2.0#	2.1#	—	—	NA	NA	—	TIF
2-6-07	JSS	OK	T	NA	OK	54#	1	2#	2-#	2.1#	—	—	NA	NA	—	TIF
8-30-08	JSS	OK	P	NA	OK	55#	1	2#	2#	2#	Good	Good	NA	NA	—	TIF
9-18-09	JSS	OK	Painted	NA	OK	55#	1	2.2#	2#	2.05#	Good	Good	NA	NA	OK	TIF
12-6-10	JSS	OK	OK	NA	OK	54#	1	2#	2#	NA						

Relief Or Auto Shutoff Valves					
Press to Open		Leak Test	Serviced	Vent Cap	Free	Pos. OK
Found	Left					
6#	4#	TIF	—	OK	OK	OK
4#	5#	TIF	—	OK	OK	OK
5#	5#	TIF	—	OK	OK	OK
5#	5#	TIF		OK	OK	OK

Indicate all pressures found and left as indicated. Remarks can be entered horizontally across form beneath last inspection entry
See reverse side for Filter/Strainer Inspection Record complete filter record as applicable to station maintenance.
MOP indicates Maximum Operating Pressure. This is the maximum pressure at which the system may be operated as specified by Gas engineering DO NOT EXCEED MAXIMUM OPERATING PRESSURE

ABBREVIATIONS:
OK Found or Left OK
S Soap Tested for Leaks
T Touched Up Paint
C Cleaned
D Drained
I Disassembled & Inspected
R Replaced
G Greased Plug Valve
A Adjusted
Fltr Filter or Strainer

5 Year Maintenance _____
10 Year Maintenance _____

IRS, must obtain your correct taxpayer identification number (TIN) to report, for example, income paid to you, real estate transactions, mortgage interest you paid, acquisition or abandonment of secured property, contributions you made to

U.S. person

• A partnership, corporation

AVISTA

March 17, 2011

To: Ms. Robison, Mt. Vernon Terrace Apartments
Fax 509-532-1047

From: Kris Busko, Gas Engineer
509-495-8767

2 Pages:

This Fax Cover Sheet
Odorant Levels

Ms. Robison,

Attached please find a copy of the odorant reads for various sites around the county. We are required to odorize the gas so that it is readily detectible at 0.40% gas in air. All of the reads on this list are well below that, meaning that the odor is detectible at much smaller quantities of gas.

Yesterday I spoke with Mark Hansen, a customer project coordinator for Avista, about what it might take to convert your apartment complex out of a master meter set up. Generally, it would involve Avista setting meters at other sites around the complex so that we would be responsible for the maintenance of the underground system up to those new meters. If a full conversion was possible it would relieve you of the requirements associated with being a master meter operator and you would no longer have to deal with the state regulations, or have to pay a contractor to do cathodic protection or leak survey. Other master meter customers in town have been able to go that route and avoid the ongoing hassle of being audited.

I passed along your phone number so he may be in touch to talk with you about it. His number is 495-4285 if you wish to reach him first to discuss things.

Thank you

Kris Busko

O[illegible] Readings at various locat[illegible] d Spokane and Spokane County. All reads are well under the maximum 0.40 detectable level as requi[illegible] by Avista standards.

(This information provided 3/17/1[illegible] obison at Mt. Vernon Terrace Apartments)

Kris Busko, Avista Gas Engineer