

I question the use of the term "**SNIFF TEST**" as defined in the proposed changes in Gas Pipeline Safety Rule Making - Chapter 480-93 WAC.

A SNIFF TEST has been defined as an odorant level test made without the use of an odorometer. Ed Ondak, DOT Western Regional Director, in a Pipeline Safety Seminar (March 1997) described the SNIFF TEST as follows:

*with a small stream of gas venting to the atmosphere the gas is pulled by hand to one's nose. The tester would make an odorant level determination.*

This SNIFF TEST procedure as described above was approved by T. A. Bell,

WUTC representative on April 16, 1997 for Master Meter Operators. Also, WUTC recommended Form 10 for Master Meter Operators to record odorant level for quarterly test. Form 10 is titled "SNIFF TEST" and/or "ODOROMETER TEST, ODORIZATION CHECK REPORT."

Please consider reserving the term SNIFF TEST for Master Meter operations.

The proposed changes appears to require Master Meter Operators to make monthly checks with an odorometer. This would require operators to purchase an odorometer costing hundreds of dollars and maintain a trained operator or hire a trained person to make monthly odorant tests. In either case, it would cost each operator about \$500 per year.

I contend Master Meter Operators have no control over the odorant injection and additionally that the gas supplier is required by OPS to supply odorized gas. Some form of exemption is recommended for the Master Meter Operators from making their questionable test.

Submitted,

Raymond A. Allen, PE Master Meter service provider  
Natural Gas Engineering  
10705 N Fairview Rd  
Spokane, WA 99217-9726  
Phone: 509.467.3911  
Fax: 509.467.3910  
Email: [rayallen75@aol.com](mailto:rayallen75@aol.com)