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Raymond A. Allen, P.E.
10705 N Fairview Rd
Spokane, WA 99217-9726
Voice: 509-467-3911
Fax: 509-467-3910
Email: rayallen75@aol.com

Natural Gas System Engineering - Fax Transmission

TO: Carole Washburn Co: WUTC

Fax Number: 360,586.1150 Telephone Number:

Date: 1-19-2005 Page 1 of 2

RE: Dock No UG-011073
Proposed Rules 480-93 WAC

Message:

RECEIVED
RECORDS MANAGEMENT
05 JAN 20 PM 2:11
STATE OF WASH
UTIL AND TRANS
COMMISSION

The proposed Rulemaking (CR-102) would still impact the Master Meter Operators as I indicated in my e-mail letter dated 8-12-2004, copy attached.

I make reference to 480-93-005, items 14, 15 (c) and 21
480-93-015, item 2.

I hope that a provision will be made in the coming updating of rules for Master Meter Operators to either remove odorant level testing or OK the nose test for odorant acceptance levels.

Raymond A. Allen, P.E.

Message

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Subj: **Natural gas odorant level testing at Master Meter Installations - Chapter 480-93 WAC**
Date: **8/12/2004 8:29:42 AM Pacific Daylight Time**
From: occonnor@gonzaga.edu
To: records@wutc.wa.gov
CC: rayallen75@aol.com

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 recorded 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

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