Summary of Written Comments on CR-102 Proposed Rules

Hazardous Liquids Pipeline Safety Rulemaking

Adoption

PL-061026

ISSUE	INTERESTED PERSON	COMMENTS	RESPONSE
1) WAC 480-75-450 Construction specifications.	David Knoelke, Compliance Coordinator Olympic Pipe Line Co BP Pipelines (North America), Inc.	Language should be added that exempts the requirement that the seams be located on the upper half of the pipe when constructing pipelines using boring or directional drilling techniques. It would be nearly impossible to control the orientation of the pipe seams while using these construction techniques.	BP's suggestion is appropriate. The rule has been redrafted to address this suggested change.
2) WAC 480-75-650 Annual reports.	Alan Cabodi, President McChord Pipeline Co.	McChord Pipeline Co. asserts the annual reporting requirement in WAC 480-75-650 (2) needs further clarification. McChord believes that the intent is to have the operators continue to complete a standardized form (presently Form 024-025) that is provided by the commission yearly which requires all the information listed in the WAC section as revised. McChord asserts that, as worded, this section leaves open to interpretation the definition of a "report" and the amount of detail required. McChord recommends the following language in WAC 480-75-650 (2) "A report form titled, "Hazardous Liquid Annual Report Form" which can be obtained from the Pipeline Safety Section of the commission. The annual report must include…….	McChord's suggestions are appropriate. The rule has been redrafted to reflect the suggested changes.
	David Knoelke, Compliance Coordinator Olympic Pipe Line Co BP Pipelines (North America), Inc.	BP had requested to make a change to the annual report as it related to the Federal form that they submit. After discussions with staff their request was withdrawn.	