



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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Ref. No. Docket PG-070013

**CERTIFIED MAIL**

July 12, 2007

Michael Faulkenberry, P.E.  
Chief Gas Engineer  
Avista Utilities Corporation  
East 1411 Mission  
Spokane, Washington 99220

Dear Mr. Faulkenberry:

**Subject: 2007 Standard Natural Gas Inspection – Spokane/Ritzville**

We conducted a natural gas inspection from May 14, 2007 through May 24, 2007, of Avista Utilities (Avista) Spokane and Ritzville districts. The inspection included a procedures manual review, records review and inspection of pipeline facilities.

Our inspection indicates a series of four probable violations, as noted in the enclosed report. You have indicated that Avista has taken the initial steps to correct the noted probable violations so we are proposing the following:

**Our decision on next steps**

We have decided to seek an agreed order that will include conditions necessary to resolve the probable violations noted in our inspection. For us to take this action, the terms and conditions of the agreement must be agreed to by Avista. Your company will have the opportunity to work with us in drafting the agreement. The commission must approve any agreement between staff and Avista which may be done as a consent item at an open public meeting. If Avista does not agree to this course of action, we will pursue a complaint with penalty.

We have attached an outline of the terms and conditions which contains language for each probable violation and area of concern identified in our inspection report. Once we reach agreement on the wording of the conditions, we can begin drafting a proposed order.



**Your response is needed.**

Please review this letter carefully and respond in writing by August 16, 2007 as to whether Avista agrees to enter an agreement to close this docket. Such an agreement will resolve all of the probable violations, areas of concern, and the additional conditions listed below.


**DRAFT AGREEMENT CONDITIONS**

(Numbers coincide to the probable violations noted in the enclosed findings report.).

1. Avista will implement a system wide survey and remediation program to identify and remediate any similar regulator vent installations.
2. Avista will either begin to track production joints to the extent necessary to demonstrate compliance, or implement procedures ensuring that personnel are requalified at a timeframe not to exceed 12 months.
3. Avista will provide their contractors with combustible gas indicators to use when purging pipelines. We also understand that Avista may revise certain procedures that pertain to the purging of service lines.
4. Avista will conduct training for personnel responsible for conducting pressure tests to ensure all required information is recorded. Avista may also need to revise as-built records to better document the required information.

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-070013 in any future correspondence regarding this inspection.

Sincerely,



Alan E. Rathbun  
Pipeline Safety Director

Enclosure

## UTILITIES AND TRANSPORTATION COMMISSION

### 2007 Natural Gas Pipeline Safety Inspection Avista Utilities – Spokane/Ritzville District Docket PG-070013

#### Probable Violations

The following probable violation(s) of Title 49 CFR Part 192 and Washington Administrative Code 480-93 were noted as a result of the inspection of Avista Utilities' Spokane and Ritzville districts. The inspection included a random selection of records, operation and maintenance, emergency response and field inspection of certain pipeline facilities.

1. **49 CFR §192.355(b)(1) Customer meters and regulators: Protection from damage.**

*b) Service regulator vents and relief vents. Service regulator vents and relief vents must terminate outdoors, and the outdoor terminal must:*  
*(1) Be rain and insect resistant;*

**Findings:**

At the time of this inspection, the following service regulators had relief vents which were installed in a manner that could potentially allow rain and moisture accumulation inside the regulator which may affect the proper operation of the device.

- a. Meter #125420 at Mission and Pines.
- b. Meter #942575 at Spokane Valley Mall off E Indiana behind TJ Maxx.
- c. Meter #106423 off N Division
- d. Meter #110105 at N Division behind Wal Mart.
- e. Meter #67666 at N Division behind Wal Mart.
- f. Meter #300063 at Mission and Argonne, Perkins restaurant.

2. **WAC 480-93-080(2)(c) Welder and plastic joiner identification and qualification.**

*(c) In order to ensure compliance with (b) of this subsection and Title 49 CFR Part 192.285(c), each operator must have a method of tracking production joints. This method must be outlined in the operator's procedures manual. Production joints need to be tracked only to the extent that shows compliance with this requirement. Operators may elect not to track production joints, in which case personnel qualified to join plastic pipe must be requalified at a frequency not to exceed twelve months.*

**Findings:**

Avista has elected to not track production joints and to re-qualify plastic pipe joiners on a frequency not to exceed 12 months. The following plastic pipe joiners qualified on the dates listed which exceeded 12 months.

Avista was unable to verify whether these employees were or were not joining plastic pipe after their qualifications had expired.

- a. James Aragon – 1/13/2006 to 2/6/2007
- b. Jeff Hobbs – 1/13/2006 to 2/6/2007
- c. Dale Smith – 1/12/2006 to 1/24/2007
- d. Jushua Smith – 1/12/2006 to 1/24/2007
- e. Ken Wuesthoff – 1/12/2006 to 2/6/2007

3. **WAC 480-93-180(1) and 49 CFR §192.13(c) Plan of operations and maintenance procedures - emergency policy - reporting requirements.**

*WAC - (1) Each operator must have a plan and procedure manual for operation, maintenance, inspection, and emergency response activities. The manual must comply with the provisions of the "Pipeline Safety Improvement Act of 2002." The manual must include plans and procedures for all requirements of 49 CFR § 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors.*

*CFR - (c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.*

**Findings:**

Avista procedure GSM 3.17 requires that a combustible gas indicator (CGI) be used when purging air from mains and services. On May 1<sup>st</sup> and 2<sup>nd</sup> we conducted field inspections of Avista contractor M&L Construction Inc. When asked to see their CGI used for purging lines into service the contractor explained that they do not use CGI's and that they use the 100 lineal feet per minute method instead.

4. **WAC 480-93-170(7)&(9)**

*(7) Operators must keep records of all pressure tests performed for the life of the pipeline and must document the following information:*

- (a) Operator's name;*
- (b) Employee's name;*
- (c) Test medium used;*
- (d) Test pressure;*
- (e) Test duration;*
- (f) Pipe size and length;*
- (g) Dates and times; and*
- (h) Test results.*

*(9) Where multiple pressure tests are performed on a single installation, operators must maintain a record of each test. An example of a single installation with multiple tests would be any continuous on-going job or installation such as a new plat or long main installation where more than one pressure test was conducted during construction.*

**Findings:**

We reviewed pressure test records for several new construction plats. Records were incomplete and did not have all of the required test data. Missing information included pipeline length and in some cases the entire test data where multiple tests were conducted. The following records have incomplete test data:

- a. Valleyway and Riley. We were unable to determine if multiple tests were performed and the length and duration of the individual tests.
- b. Wabash and Willow. We were unable to determine the length and if a single or multiple test was performed.
- c. Flora and Mission. We were unable to determine length, size and if multiple tests were performed.