



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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Ref. No. Docket PG-070132

CERTIFIED MAIL

January 14, 2008

Stephen Dyer
Vice President, Manufacturing
Agrium U.S. Inc.
13131 Lake Fraser Drive S.E.
Calgary, Alberta T2J7E8
Canada

Dear Mr. Dyer:

Subject: 2007 Natural Gas Standard Inspection – Agrium U.S. Inc.

We conducted a natural gas inspection from December 17, 2007 to December 18, 2007, of Agrium U.S. Inc. Natural Gas Pipeline. The inspection included a records review and inspection of the pipeline facilities.

Our inspection indicates 79 probable violations as noted in the enclosed report.

Your response needed

Please review the attached report and respond in writing by February 15, 2008. The response should include how and when you plan to bring the probable violations into full compliance.

What happens after you respond to this letter?

The attached report presents staff's decision on probable violations and does not constitute a finding of violation by the commission at this time.

After you respond in writing to this letter, there are several possible actions the commission, in its discretion, may take with respect to this matter. For example, the commission may:

- Issue an administrative penalty under RCW 81.88.040,, or



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- Institute a complaint, seeking monetary penalties, changes in the company's, practices, or other relief authorized by law, and justified by the circumstances, or
- Consider the matter resolved without further commission action.

We have not yet decided whether to pursue a complaint or penalty in this matter. Should an administrative law judge decide to pursue a complaint or penalty; your company will have an opportunity to present its position directly to the commissioners.

If you have any questions, or if we may be of any assistance, please contact Joe Subsits at (360) 664-1322. Please refer to Docket PG-070132 in any future correspondence regarding this inspection.

Sincerely,



Carole J. Washburn
Executive Secretary

cc: Don Larue, Agrium U.S. Inc.

UTILITIES AND TRANSPORTATION COMMISSION
2007 Natural Gas Pipeline Safety Inspection
Agrium US Inc.
Docket PG-070132

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 the Agrium U.S. Inc. Natural Gas Pipeline. The inspection included a random selection of records, operation and maintenance, emergency response, inventory and field inspection of the pipeline facilities.

PROBABLE VIOLATIONS

1. **49 CFR 192.605(a) Procedural manual for operations, maintenance and emergencies**

Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response....The manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year.

Finding(s):

There was no evidence that the O&M manual was reviewed annually.

2. **49 CFR 192.605(b)(8) Procedural manual for operations, maintenance and emergencies**

Each operator shall prepare and follow for each pipeline a manual of written procedures for conducting operations and maintenance activities and for emergency response.

The manual must include procedures for the following:

Periodically reviewing the work done by operator personnel to determine the effectiveness and adequacy of the procedures used in normal operations and maintenance and modifying procedures when deficiencies are found.

Finding(s):

There was no evidence that periodic review of personnel work had been done.

3. **49 CFR 192.481 Atmospheric corrosion control: monitoring**

Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion at least once every three calendar years, but with intervals not exceeding 39 months.

Finding(s):

There was no evidence that atmospheric monitoring had been done.

4. **WAC 480-93-180(1)Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan must comply with the provisions of the "Pipeline Safety Improvement Act of 2002." Then 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.

WAC 480-93-200(2)(a-d) requires a 24 hour notification for the conditions defined in section a-d.

Finding(s):

This requirement was not in Agrium's procedures manual.

5. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC480-93-200(6) requires that operators provide a written report to the commission within five days of receiving a failure analysis of any incident or hazardous condition that was due to construction defects or material failures.

Finding(s):

This requirement was not found in Agrium's procedure manual.

6. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-93-200(7)(b)(iii) requires that the operator submit damage prevention statistics to the commission annually.

Finding(s):

This requirement was not found in Agrium's procedure manual.

7. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-93-200(7)(c) requires the submission of an annual report detailing construction defects and material failures resulting in leakage.

Finding(s):

This requirement was not found in Agrium's procedure manual.

8. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC480-93-200(8) requires that the operator file with the commission and appropriate municipalities contact information for responsible officials of the operator who may be contacted in the event of an emergency.

Finding(s):

This requirement was not found in Agrium's procedure manual.

9. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-93-200(9) requires that the operator send daily reports of construction and repair activity to the commission.

Finding(s):

This requirement was not found in Agrium's procedure manual.

10. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-93-200(10) requires that when the operator submits Drug and Alcohol testing information to the Office of Pipeline Safety, the form needs to also be sent to the commission.

Finding(s):

This requirement was not found in Agrium's procedure manual.

11. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.55 addresses steel pipe manufacturing.

Finding(s):

This requirement was not found in Agrium's procedure manual.

12. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.63 addresses marking of materials.

Finding(s):

This requirement was not found in Agrium's procedure manual.

13. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.143 addresses general design requirements.

Finding(s):

This requirement was not found in Agrium's procedure manual.

14. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.144 (a-b) addresses the qualification of components.

Finding(s):

This requirement was not found in Agrium's procedure manual.

15. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.145(a-e) addresses valve design requirements.

Finding(s):

This requirement was not found in Agrium's procedure manual.

16. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.147(a-c) addresses flange design requirements.

Finding(s):

This requirement was not found in Agrium's procedure manual.

17. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**
Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.150 (a-c) addresses the passage of internal inspection devices.

Finding(s):

This requirement was not found in Agrium's procedure manual.

18. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**
Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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

49 CFR 192.153(a-d) addresses components fabricated by welding requirements.

Finding(s):

This requirement was not found in Agrium's procedure manual.

19. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**
Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.155 addresses welded branch connection design.

Finding(s):

This requirement was not found in Agrium's procedure manual.

20. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**
Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.159 addresses pipeline flexibility design.

Finding(s):

This requirement was not found in Agrium's procedure manual.

21. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.161 (a-f) addresses pipeline support and anchor design.

Finding(s):

This requirement was not found in Agrium's procedure manual.

22. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.179(a-d) addresses transmission valve design. 49 CFR 192.181(a-c) addresses distribution valve design.

Finding(s):

These requirements were not found in Agrium's procedure manual.

23. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.195 addresses protection against accidental overpressure design.

Finding(s):

This requirement was not found in Agrium's procedure manual.

24. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.199(a-h) addresses requirements for the design of pressure relief and limiting devices.

Finding(s):

This requirement was not found in Agrium's procedure manual.

25. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.201 addresses the required capacity of pressure relieving and limiting stations.

Finding(s):

This requirement was not found in Agrium's procedure manual.

26. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.225(a) requires that weld procedures be qualified under Section 5 of API 1104 (19th edition) of section IX of ASME Boiler and Pressure Code.

Finding(s):

This requirement was not found in Agrium's procedure manual.

27. **WAC 480-93-180(1) Plan of Operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.225 addresses compliance with welding procedures, retention of tests and procedures.

Finding(s):

This requirement was not found in Agrium's procedure manual.

28. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.227 addresses qualification of welders.

Finding(s):

This requirement was not found in Agrium's procedure manual.

29. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-93-080 (1)(b) addresses qualification of testing and welder, measurement of essential variables and documentation of results.

Finding(s):

This requirement was not found in Agrium's procedure manual.

30. **WAC 480-93-080(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-93-080(1)(d) addresses the requirement for having weld procedures on-site when welding.

Finding(s):

This requirement was not found in Agrium's procedure manual.

31. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-93-080(3) addresses need for welders to carry identification and qualification card.

Finding(s):

This requirement was not found in Agrium's procedure manual.

32. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.229(b) requires that a welder may not weld on a particular process unless he has welded on that process within the previous six months.

Finding(s):

This requirement was not found in Agrium's procedure manual.

33. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.229(c) addresses welder qualification and associated testing.

Finding(s):

This requirement was not found in Agrium's procedure manual.

34. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.231 addresses welding protection from weather.

Finding(s):

This requirement was not found in Agrium's procedure manual.

35. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.233 addresses miter joints.

Finding(s):

This requirement was not found in Agrium's procedure manual.

36. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.235 addresses preparation for welding.

Finding(s):

This requirement was not found in Agrium's procedure manual.

37. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.241(a-c) addresses inspection and testing of welds.

Finding(s):

This requirement was not found in Agrium's procedure manual.

38. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.243(a-f) address nondestructive testing of welds.

Finding(s):

This requirement was not found in Agrium's procedure manual.

39. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.245 addresses the repair and removal of weld defects.

Finding(s):

This requirement was not found in Agrium's procedure manual.

40. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.303 addresses compliance with specifications and standards.

Finding(s):

This requirement was not found in Agrium's procedure manual.

41. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.307 addresses construction inspections.

Finding(s):

This requirement was not found in Agrium's procedure manual.

42. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.307 addresses inspection of materials during construction.

Finding(s):

This requirement was not found in Agrium's procedure manual.

43. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.309(a-e) addresses repair of steel pipe.

Finding(s):

This requirement was not found in Agrium's procedure manual.

44. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.313(a-c) addresses bends and elbows.

Finding(s):

This requirement was not found in Agrium's procedure manual.

45. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.315(a-b) addresses wrinkle bends in steel pipe.

Finding(s):

This requirement was not found in Agrium's procedure manual.

46. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.317(a-c) addresses protection from hazards.

Finding(s):

This requirement was not found in Agrium's procedure manual.

47. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.319(a-b) addresses installation of pipe in a ditch.

Finding(s):

This requirement was not found in Agrium's procedure manual.

48. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.323(a-d) and WAC 480-93-115(1-4) addresses casings.

Finding(s):

These requirements were not found in Agrium's procedure manual.

49. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.325(a-d) addresses underground clearance.

Finding(s):

This requirement was not found in Agrium's procedure manual.

50. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.327(a-e) addresses pipeline cover.

Finding(s):

This requirement was not found in Agrium's procedure manual.

51. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.453 addresses qualification of corrosion personnel.

Finding(s):

This requirement was not found in Agrium's procedure manual.

52. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.455(e) addresses aluminum installations near pipelines.

Finding(s):

This requirement was not found in Agrium's procedure manual.

53. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-93-110(4) addresses cathodic protection evaluation procedures.

Finding(s):

This requirement was not found in Agrium's procedure manual.

54. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-93-110(8) addresses the requirement to take pipe-to-soil readings when a buried pipe has been exposed and the coating removed.

Finding(s):

This requirement was not found in Agrium's procedure manual.

55. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.479(a-c) addresses atmospheric corrosion control.

Finding(s):

This requirement was not found in Agrium's procedure manual.

56. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-93-110(5)(a-d) address casing monitoring and response to shorted conditions.

Finding(s):

This requirement was not found in Agrium's procedure manual.

57. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-903-110(3) addresses calibration of cathodic protection instrumentation.

Finding(s):

This requirement was not found in Agrium's procedure manual.

58. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**
Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.515 addresses environmental protection and safety during pressure testing.

Finding(s):

This requirement was not found in Agrium's procedure manual.

59. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**
Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-93-170(1-10) addresses state pressure testing requirements.

Finding(s):

This requirement was not found in Agrium's procedure manual.

60. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**
Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-93-155(1-2) addresses state uprating requirements.

Finding(s):

This requirement was not found in Agrium's procedure manual.

61. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**
Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.605(a) addresses the annual procedure manual review.

Finding(s):

This requirement was not found in Agrium's procedure manual.

62. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 605(b)(5) addresses the periodic review of personnel work to determine effectiveness of procedures.

Finding(s):

This requirement was not found in Agrium's procedure manual.

63. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.605(b)(11) require procedure for prompt response to reports of gas odors inside or near buildings.

Finding(s):

This requirement was not found in Agrium's procedure manual.

64. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.613(b) requires that pipe pressure be reduced if pipe condition determined to be unsatisfactory.

Finding(s):

This requirement was not found in Agrium's procedure manual.

65. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.615 addresses emergency plans.

Finding(s):

This requirement was not found in Agrium's procedure manual.

66. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.616(a) requires a public education program consistent with API RP 1162.

Finding(s):

This requirement was not found in Agrium's procedure manual.

67. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.619 addresses MAOP requirements.

Finding(s):

This requirement was not found in Agrium's procedure manual.

68. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-93-015(1-4) addresses State odorization requirements.

Finding(s):

This requirement was not found in Agrium's procedure manual.

69. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-93-185(1-3) addresses gas leak investigations.

Finding(s):

This requirement was not found in Agrium's procedure manual.

70. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-93-186(1-4) addresses leak evaluation requirements.

Finding(s):

This requirement was not found in Agrium's procedure manual.

71. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-93-187(1-13) addresses gas leak records.

Finding(s):

This requirement was not found in Agrium's procedure manual.

72. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-93-188 addresses gas leak surveys.

Finding(s):

This requirement was not found in Agrium's procedure manual.

73. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-93-124 addresses pipeline markers.

Finding(s):

This requirement was not found in Agrium's procedure manual.

74. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.745(b) and 49 CFR 192.747(b) address the requirement for prompt remedial action to correct inoperable valves.

Finding(s):

This requirement was not found in Agrium's procedure manual.

75. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

49 CFR 192.751(a-c) addresses requirements for prevention of accidental ignition.

Finding(s):

This requirement was not found in Agrium's procedure manual.

76. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-93-013 addresses requirement to require that new construction be identified as a covered task.

Finding(s):

This requirement was not found in Agrium's procedure manual.

77. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-93-017(1-2) addresses requirements to file design, construction and construction procedures with the commission.

Finding(s):

This requirement was not found in Agrium's procedure manual.

78. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-93-018 addresses requirements to update records resulting from construction activity within six months.

Finding(s):

This requirement was not found in Agrium's procedure manual.

79. **WAC 480-93-180(1) Plan of operations and maintenance procedures: emergency policy; reporting requirements**

Each operator must have a plan and procedure manual for operation, maintenance, inspection and emergency response activities. The plan 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.

WAC 480-93-020 addresses requirements for proximity consideration.

Finding(s):

This requirement was not found in Agrium's procedure manual.