



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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(360) 664-1160 • TTY (360) 586-8203

Ref. No. Docket PG-080002

**VIA CERTIFIED MAIL**

February 11, 2009

Tim Haynes  
Vice President and Mill Manager  
Weyerhaeuser Company  
PO Box 188  
Longview, WA 98632

Dear Mr. Haynes:

**RE: 2009 Pipeline Integrity Management Program Inspection**

During the week of January 27 through January 29, 2009, inspectors from the Utilities and Transportation Commission's Pipeline Safety Program conducted an inspection of Weyerhaeuser's (Weyco) Integrity Management Program (IMP) and other related records.

Because Weyco operates a small pipeline system at low stress with only one High Consequence Area (HCA), certain aspects of federal IMP rules are not applicable. In addition, Weyco has elected to consider the entire length of the pipeline as an HCA, which calls for application of monitoring requirements less stringent than otherwise.

Our review indicates the following apparent inadequacies found within Weyco's IMP or related procedures.

1. **Baseline Assessment Plan**

**49 CFR §192.921(a)(2) How is the baseline assessment to be conducted?**

(a) *Assessment methods. An operator must assess the integrity of the line pipe in each covered segment by applying one or more of the following methods depending on the threats to which the covered segment is susceptible. An operator must select the method or methods best suited to address the threats identified to the covered segment.*

(2) *Pressure test conducted in accordance with subpart J of this part. An operator must use the test pressures specified in Table 3 of section 5 of ASME/ANSI B31.8S, to justify an extended reassessment interval in accordance with §192.939.*



*ASME B31.8S, Section 6.3.4 requires that any section of pipe that fails a pressure test shall be examined in order to evaluate that the failure was due to the threat for which the test was intended to address. If the failure was due to another threat, the test failure information must be integrated with other information relative to the other threat and the segment re-assessed for risk.*

**Finding(s):**

Weyco has elected to conduct a pressure test for identifying anomalies associated with specific threats identified. However, Weyco's IMP does not contain the requirements of ASME B318S, Section 6.3.4.

**Recommended Action:**

Weyerhaeuser must add these requirements into its IMP plan.

2. **Quality Assurance Process**

**49 CFR §192.911(l) What are the elements of an integrity management program?**

*An operator's initial integrity management program begins with a framework (see § 192.907) and evolves into a more detailed and comprehensive integrity management program, as information is gained and incorporated into the program. An operator must make continual improvements to its program. The initial program framework and subsequent program must, at minimum, contain the following elements.*

*(l) A quality assurance process as outlined in ASME/ANSI B31.8S, section 12.*

*ASME B31.8S, section 12.2(c) requires that when an operator chooses to use outside resources to conduct any process, for example pigging, that affects the quality of the integrity management program, the operator shall ensure control of such processes and document them within the quality program.*

**Finding(s):**

Weyco has elected to use an outside contractor to conduct its future hydrotest. However, Weyco's IMP plan contains no process or procedure for the oversight of this contractor.

**Recommended Action:**

Weyerhaeuser must add this requirement into its IMP plan.

**Your response needed**

Please review the findings noted above and respond in writing by March 11, 2009. Your response should include how and when you will implement the changes to your IMP and related documents we note above. If you disagree with the changes recommended by UTC staff, please include a detailed description and explanation of the changes you dispute. This notice presents the position of the Pipeline Safety section; it does not constitute a finding of violation by the commission at this time.

Weyerhaeuser Company  
Docket PG-080002  
February 11, 2009  
Page 3

**What happens after you respond to this notice?**

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

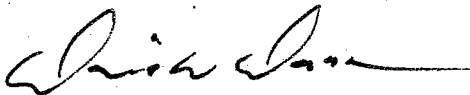
- Consider the matter resolved without further action.
- Schedule an informal mediation to try to resolve any items you dispute.
- Issue a formal complaint to resolve the matter.

We appreciate the continued cooperation and professionalism by Weyco during this inspection and look forward to working with you to resolve these matters.

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 numbers PG-080002 in any future correspondence regarding this inspection.

Thank you for your cooperation and interest in pipeline safety.

Sincerely,



David W. Danner  
Executive Director and Secretary

cc: Anne F. Soiza, Director, Pipeline Safety  
Ron Kosloski, Weyerhaeuser Company  
Robert Cosentino, Cosentino Consulting