

#### STATE OF WASHINGTON

## WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250
(360) 664-1160 • TTY (360) 586-8203 Ref. No. Docket PG-080098

### **CERTIFIED MAIL**

November 17, 2008

Gary W. Kaiser Vice President, Camas Mill Operations Georgia Pacific Consumer Products (Camas) LLC 401 NE Adams Street Camas, WA 98607

Dear Mr. Kaiser:

Subject: 2008 Natural Gas Standard Inspection - Georgia-Pacific Camas Mill

The Washington Utilities and Transportation Commission conducted a natural gas inspection of the Georgia Pacific Consumer Products (Camas) LLC in September, 2008. The inspection included a records review and inspection of the pipeline facilities, the GP Camas Mill Drug/Alcohol manual, and the Koch Industries 2008 corporate Drug/Alcohol manual. It is our understanding that the Koch manual has been customized, adopted, and implemented by the GP Camas Mill with employee training to be completed by the end of November 2008.

Our inspection indicates an area of concern regarding the qualification of welders. Unless corrected, this could potentially lead to future violation of state and/or federal pipeline safety rules. Please review the attached report and respond in writing by December 19, 2008. The response should include how you plan to address this concern.

If you have any questions, please contact Patti Johnson at (360) 664-1266. Please refer to Docket PG-080098 in any future correspondence regarding this inspection.

Sincerely,

David W. Danner

**Executive Director and Secretary** 

Enclosure

cc: Anne F. Soiza, Pipeline Safety Director

Steve Young, Environmental Program Director, GP Camas Mill

Greg Collins, Power and Recover Production Leader, GP Camas Mill

# WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION 2008 Standard and Drug & Alcohol Inspection Georgia Pacific-Inspection Report Docket PG-080098

### AREA OF CONCERN

### 1. 49 CFR §192.227 Qualification of Welders

(a) Except as provided in paragraph (b) of this section, each welder must be qualified in accordance with section 6 of API 1104 (incorporated by reference, see §192.7) or section IX of the ASME Boiler and Pressure Vessel Code (incorporated by reference, see §192.7). However, a welder qualified under an earlier edition than listed in §192.7 of this part may weld but may not requalify under that earlier edition.

### Finding(s):

Georgia Pacific qualified three welders utilizing API 1104 Section 6, the 18<sup>th</sup> edition instead of the 19<sup>th</sup> edition:

- 1. Ron Higdon, tested 4-4-2008
- 2. Mark Woolridge, tested 8-12-2008
- 3. Randy Howe, tested 8-12-2008

It is our understanding that no welding has been performed on this pipeline since its completion. It is the responsibility of the company to ensure that company welding procedures and welders are qualified to the most current referenced standard before performing welding activities on the GP Camas Mill pipeline.