



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-090033

VIA CERTIFIED MAIL

July 21, 2009

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

Dear Mr. Kaiser:

RE: 2009 Pipeline Integrity Management Program Inspection

On July 7 through July 8, 2009, an inspector from the Washington Utilities and Transportation Commission's Pipeline Safety Program conducted an inspection of Georgia Pacific's (GP) Pipeline Integrity Management Program (IMP) and other related records.

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

1. **Baseline Assessment Plan**

49 CFR §192.919 (e) What must be in the baseline assessment plan?

An operator must include each of the following elements in its baseline assessment plan:

- (e) *A procedure to ensure that the baseline assessment is being conducted in a manner that minimizes environmental and safety risks.*

Finding(s):

Section 2.6 of GP's IMP addresses Consideration of Environmental and Safety Risks. This language was general and did not identify or address public and employee safety issues. More detail should be provided or referenced to meet this requirement.



2. **Remediation**

49 CFR §192.933 (d) What actions must be taken to address integrity issues?

(d) Special Requirements for scheduling remediation.-(1) Immediate repair conditions. An operator's evaluation and remediation schedule must follow ASME/ANSI B31.8S, section 7 in providing for immediate repair conditions. To maintain safety an operator must temporarily reduce operating pressure in accordance with paragraph (a) of this section or shut down the pipeline until the operator completes the repair of these conditions.

Finding(s):

Section 5.1.3 of the GP's IMP correctly states that an 80% pressure reduction or pipeline shutdown will occur when an immediate repair condition is discovered. This can be a complex process which should be described in a detailed procedure. This will help ensure that the shutdown/ pressure reduction process is carried out in a systematic and safe manner.

3. **Quality Assurance**

49 CFR §192.915(a) What knowledge and training must personnel have to carry out an integrity management program?

(a) Supervisory personnel. The integrity management program must provide that each supervisor whose responsibilities relate to the integrity management program possesses and maintains a thorough knowledge of the integrity management program and of the elements for which the supervisor is responsible. The program must provide that any person who qualifies as a supervisor for the integrity management program has appropriate training or experience in the area for which the person is responsible.

Finding(s):

Section 12.6.1 of the GP's IMP addresses supervisory qualifications. The section was general and did not define what appropriate training and experience is. Additional detail is needed to define how this requirement will be met.

Your response needed

Please review the findings noted above and respond in writing by August 24, 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.

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What happens after you respond to this notice?

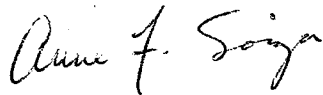
After you respond in writing, there are several possible actions we may take with respect to this matter. For example, the commission may:

- 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 GP 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 assistance, please contact Joe Subsits at (360) 664-1322. Please refer to docket numbers PG-090033 in any future correspondence regarding this inspection.

Sincerely,



Anne F. Soiza
Pipeline Safety Director

cc: Steve Ringquist, Georgia Pacific Company
Roy Rogers, Cathodic Protection Engineering Inc. Consulting