



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 PL-091410

**CERTIFIED MAIL**

September 3, 2009

Alan J. Cabodi, President  
McChord Pipeline Company  
3001 Marshall Avenue  
Tacoma, Washington 98421

Dear Mr. Cabodi:

**Subject: Integrity Management Field Inspection**

We conducted a field inspection of McChord Pipeline (McChord) during the extraction of an in-line inspection tool on August 5-7, 2009. The tool was located at the intersection of East 72<sup>nd</sup> and Waller Road in Tacoma, WA. A pipe section approximately 18.5 linear feet was removed and a new section welded to the existing pipeline. The removed section of pipe was previously repaired in 2004 with a clock spring wrap at a dent/gouge located on the bottom section of the pipeline where it crossed over a 52-inch diameter water main. Our inspection indicates two probable violations and one area of concern as noted in the enclosed report.

**Your response needed**

Please review the attached report and respond in writing by October 2, 2009. The response should include how and when you plan to bring the probable violations into full compliance. We also request your response to our area of concern.

**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.



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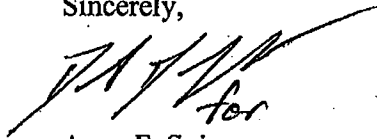
After you respond in writing to this letter, there are several possible actions the commission, in its discretion, may take with respect to this matter. For example, the commission may:

- Issue an administrative penalty under RCW 81.88.040, or
- 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 Al Jones at (360) 664-1321.

Sincerely,



Anne F. Soiza  
Pipeline Safety Director

cc: Cory Herrick, McChord Pipeline

**UTILITIES AND TRANSPORTATION COMMISSION**  
**2009 Hazardous Liquid Pipeline Field Safety Inspection**  
**McChord Pipeline Company**

The following probable violations of Title 49, CFR Part 195 were noted as a result of the field inspection of the McChord Pipeline during the extraction of an in-line inspection tool on August 5-7, 2009 at the intersection of East 72<sup>nd</sup> and Waller Road in Tacoma, WA.

**PROBABLE VIOLATIONS**

1. **49 CFR §195.402 Procedural manual for operations, maintenance and emergencies.**  
(a) *General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies.*

**Charge(s):**

McChord did not prepare and follow a qualified welding procedure.

**Finding(s):**

During the field inspection no company welding procedure was available. There was no evidence that the McChord's manuals contain a qualified welding procedure for maintenance activities.

2. **49 CFR §195.507 Recordkeeping**

*Each operator shall maintain records that demonstrate compliance with this subpart.*

(a) *Qualification records shall include:*

- (1) *Identification of qualified individual(s);*
- (2) *Identification of the covered tasks the individual is qualified to perform;*
- (3) *Date(s) of current qualification; and*
- (4) *Qualification method(s).*

(b) *Records supporting an individual's current qualification shall be maintained while the individual is performing the covered task. Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five years.*

**Charge(s):**

McChord did not maintain qualification records as required by this rule

**Finding(s):**

The McChord O&M Manual states, "The Company uses outside contractors to conduct nondestructive radiographic work. Contractor technicians must be certified in accordance with the recommendations of ASNT Recommended Practice SNT-TC-1A for the test method used". During the field inspection the radiographic technician did not have on-site

documentation of his certification. An electronic copy of the technician's certificate was made available to the commission, but the certificate was expired.

### AREAS OF CONCERN

#### CFR §195.250 Clearance between pipe and underground structures.

*Any pipe installed underground must have at least 12 inches of clearance between the outside of the pipe and the extremity on any other underground structure, ... However, where 12 inches of clearance is impracticable, the clearance may be reduced if adequate provisions are made for corrosion control.*

#### Findings:

The McChord's pipeline crosses over a 52-inch water main at the East 72<sup>nd</sup> and Waller Road intersection with less than 2-inches of clearance. During the field inspection, staff was told no cathodic protection or monitoring devices were installed in proximity to the pipelines to mitigate potential interference between the two pipelines.

Please provide in your response how McChord will provide adequate assurance for corrosion control at this location and how it will monitor in the future.