



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-100018

CERTIFIED MAIL

August 17, 2010

Eldon N. Book
Executive Vice President
Chief Operating Officer
Cascade Natural Gas
555 South Cole Rd
P.O. Box 7608
Boise, ID 83707

Dear Mr. Book:

Subject: 2010 Natural Gas Standard Inspection of Lamb Weston/BSW

We conducted a natural gas inspection on May 25 and 26, 2010 of Lamb Weston/BSW. The inspection included a records review and a field inspection of the pipeline facilities.

Our inspection indicates five 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 September 20, 2010. 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
- 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.



Lamb Weston/BSW
Docket PG-100018
August 17, 2010
Page 2

The commission has not yet decided whether to pursue a complaint or penalty in this matter. Should the commission 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 Lex Vinsel at (360) 664-1319. Please refer to Docket PG-100018 in any future correspondence regarding this inspection.

Sincerely,



David D. Lykken
Pipeline Safety Director

Enclosure

cc. Daniel E. Meredith, MDU Utilities Group
Chanda Marek, CNG
Marvin Price, Lamb Weston/BSW

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2010 Natural Gas Pipeline Safety Inspection
Lamb Weston/BSW
Docket PG-100018

The following probable violations of Title 49, CFR Part 192 and WAC 480-93 were noted as a result of the inspection of Lamb Weston/BSW (Lamb Weston) in Warden, WA. The inspection included a records review and a field inspection of the pipeline facilities.

PROBABLE VIOLATIONS

1. **WAC 480 -93-180 Plans and Procedures.**

- (2) *The manual must be filed with the commission forty-five days prior to the operation of any gas pipeline. Each gas pipeline company must file revisions to the manual with the commission annually. The commission may, after notice and opportunity for hearing, require that a manual be revised or amended.*

Finding:

The detailed operating procedure for Basin Frozen Foods #CP 640A dated Sept. 10, 2003 (Lamb Weston) was not included in UTC's copy of the CNG Maintenance Manual. UTC requires that Basin Operating Procedures be submitted to the Commission.

2. **49 CFR §192.605 Procedural manual for operations, maintenance, and emergencies.**

- (a) *General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year.*

Finding(s):

No evidence was presented to show that the detailed operating procedure for Basin Frozen Foods #CP 640A dated Sept. 10, 2003 (Lamb Weston) was reviewed each calendar year from 2004-2009.

3. **49 CFR §192.605 Procedural manual for operations, maintenance, and emergencies.**

- (a) *General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year.*

Finding(s):

No evidence was presented to show that the detailed operating procedure for Basin Frozen Foods #CP 640A dated Sept. 10, 2003 (Lamb Weston) was updated to reflect that the point of custody change had moved upstream (year unknown) and eliminated a regulator and a meter downstream of R26. CNG no longer maintain's that regulator and the meter has been removed. Metering is now done upstream of R46.

4. **49 CFR §192.709 Transmission lines: Record keeping.**

Each operator shall maintain the following records for transmission line for the periods specified:

- (c) *A record of each patrol, survey, inspection, and test required by subparts L and M of this part must be retained for at least 5 years or until the next patrol, survey, inspection, or test is completed, whichever is longer.*

Finding(s):

No evidence was presented to show that the valve maintenance records for the valve located in the Lamb Weston parking lot were retained for at least 5 years.

5. **49 CFR §192.745 Valve maintenance: Transmission lines.**

- (a) *Each transmission line valve that might be required during any emergency must be inspected and partially operated at intervals not exceeding 15 months, but at least once each calendar year.*

Finding(s):

No evidence was presented to show that the yearly valve maintenance for the valve located in the Lamb Weston parking lot was performed yearly as required.

Area of Concern

1. During the inspection, staff reviewed a number of CNG's Controlled Procedures (CP's) and found that references to sections in many procedures were not updated when the procedures were revised.
- a) **For CP 715 – Dated June 28, 2010**
- i) Section .063 Log of instrument accuracy tests as stated in Section .07 Records (Should be .08 Records)
 - ii) Section .066 after c. states 'Section .07 provides instructions for completing forms' (Should be .08 Records)
- b) **For CP 745 – Dated June 6, 2006**
- i) References to the test tree see Section (.16) should be updated to show that the test tree is now in Section .17.
 - ii) References cite Section (.173) for where to go when a device is found to have insufficient capacity. Section .173 no longer exists in CP 745; staff believes this should refer to Section .183.