



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-110043

**CERTIFIED MAIL**

March 11, 2011

James Daly  
Vice President  
Solvay Chemicals, Inc.  
3333 Richmond Ave  
Houston, TX 77098

Dear Mr. Daly:

RE: **2011 Intrastate Gas Standard Inspection – Solvay Chemicals Hydrogen Pipeline**

We conducted a hydrogen gas pipeline inspection from February 9 to February 10, 2011, of Solvay Chemicals, Inc.'s (Solvay) hydrogen pipeline facilities in Longview. The inspection included a records review and inspection of the pipeline facilities. We would like to express our appreciation to Solvay's staff and contractors for their professionalism during this inspection and willingness to take the needed steps to remain in compliance with the appropriate pipeline safety regulations.

Our inspection indicates one probable violation as noted in the enclosed report.

**Your response needed**

Please review the attached report and respond in writing by April 12, 2011. 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



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- 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 Dave Cullom at (360) 664-1141. Please refer to Docket PG-110043 in any future correspondence regarding this inspection.

Sincerely,



David D. Lykken  
Pipeline Safety Director

cc. Mike Banigan, Solvay Chemicals, Inc.

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**  
**2011 Intrastate Gas Pipeline Standard Inspection Report**  
**Solvay Chemicals, Inc. – Hydrogen Pipeline**  
**Docket No. PG-110043**

The following probable violation of WAC 480-93 was noted as a result of the inspection of the Solvay Chemicals, Inc. (Solvay) hydrogen pipeline. The inspection included a random selection of records, operation and maintenance, emergency response, inventory and field inspection of the pipeline facilities.

**PROBABLE VIOLATION**

1. **WAC 480-93-188 Gas leak surveys**

(3) *Each gas pipeline company must conduct gas leak surveys according to the following minimum frequencies:*

(e) *Unodorized gas pipelines - at least monthly.*

**Finding(s):**

Solvay is currently conducting its leak surveys at two month intervals for its unodorized hydrogen pipeline. For compliance with WAC 480-93-188 (3)(e), the leak surveys need to occur monthly.