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Olympia, WA 98516-2154
30 September 2000

Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

The Washington Utilities and Transportation Commission (WUTC) is soliciting written comments regarding Docket Nº TO-000712: Hazardous Liquids Pipeline Safety Rulemaking. The comments are solicited in two specific areas:

- What are the appropriate design considerations to ensure safe and efficient hazardous liquid pipeline facilities?
- What are the appropriate construction considerations to ensure safe and efficient hazardous liquid pipeline facilities?

The American Society of Mechanical Engineers (ASME) is a worldwide non-profit engineering society focused on technical, educational, and research issues. ASME has long had an active interest and involvement in pipeline safety issues, and has written and maintained the American National Standards that cover the design, fabrication, assembly, and placement into service of both hazardous liquid as well as natural gas pipelines. ASME B31.4 covers hazardous liquid pipelines, and ASME B31.8 covers natural gas pipelines. The committees that write and maintain these standards are composed of experts in the field, and represent the interests of the general public, regulators, fabricators, and owners of pipeline systems in reaching consensus on the rules contained in B31.4 and B31.8.

Parts of ASME Standards B31.4 and B31.8 are referenced in Federal pipeline regulations 49 CFR 192 and 49 CFR 195. ASME B31.4 and B31.8 are regularly revised to reflect the latest technologies to ensure the safe and reliable operation of pipeline systems to the greatest extent possible. The WUTC should consider the latest versions of B31.4 and B31.8 when drafting rules regarding the design and construction of both hazardous liquid and natural gas pipelines. ASME is prepared to meet with the WUTC to provide detailed information on its pipeline standards and consensus committee process.

The ASME looks forward to helping the WUTC ensure that effective rules are adopted that provide the greatest possible level of pipeline safety consistent with the existing technology.

Sincerely,

Lee A. James, P.E.
Washington State Government Coordinator
American Society of Mechanical Engineers