



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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Ref. No. Docket PG-101575 & PG-101576

CERTIFIED MAIL

December 15, 2010

Dennis Durham
District Director
Community Colleges of Spokane
1810 N Green
Spokane, WA 99217

Dear Mr. Durham:

RE: 2010 Master Meter System Standard Inspection-Community Colleges of Spokane and Spokane Falls Community College

On September 22, 2010 the Washington Utilities and Transportation Commission's (commission) pipeline safety staff conducted a Natural Gas Master Meter Standard inspection of the natural gas master meter systems for the Community Colleges of Spokane (CCS) at the Spokane Community College (SCC) facility located at 1810 N Green in Spokane, WA and at their Spokane Falls Community College (SFCC) facility located at 3410 Fort George Wright Drive in Spokane, WA.

Prior to 2010, the commission conducted technical assistance inspections at the CCS campuses. CCS committed to complying with all federal and state regulations found in the attached report and to remediate these areas of concern. These items need to be corrected in a timely manner or they could lead to future probable violation of federal and state pipeline safety regulations.

The CCS was also informed that the Master Meter Integrity Management program must be developed and implemented no later than August 2, 2011 in accordance with 49 CFR 192.1015.

Your response needed

Please review the attached report and respond in writing by January 18, 2011. The letter of intent should include:

1. A statement that CCS agrees to comply with applicable Federal (49 CFR 192) and State WAC (480-93) rules and to remedy the out of compliance items identified in the attached report; and,
2. A plan, including timeframes, to complete all out of compliance items.



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A follow up inspection(s) will be conducted at a future date to confirm the completion of the proposed work.

If you have any questions, or if we may be of any assistance, please contact Patti Johnson at (360) 870-4915 or (360) 664-1266. Please refer to Dockets PG-101575 & PG-101576 in any future correspondence regarding this inspection.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Lykken', with a long horizontal flourish extending to the right.

David D. Lykken
Pipeline Safety Director

Enclosure

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2010 Natural Gas Master Meter Pipeline Safety Inspection
Community Colleges of Spokane, Spokane, WA
Docket PG-101575 & PG-101576

Master Meter regulations are found in Title 49, CFR Part 192, 199, and WAC 480-93. The inspection included a review of operation and maintenance records, emergency response plan, and field inspection of the pipeline facilities. The following is a list of requirements that the Community Colleges of Spokane (CCS) must comply with. The operator of the master meter system must:

1. Submit annual reports in accordance with CFR 191.5.
2. Provide Telephonic Reports to UTC Pipeline Safety Incident Notification (Within 2 hours) in accordance with WAC 480-93-200(1).
3. Provide Telephonic Reports to UTC Pipeline Safety Incident Notification (Within 24 hours) in accordance with WAC 480-93-200(2).
4. Provide a 30 day written incident report for each telephonic report in accordance with WAC 480-93-200(4).
5. Provide a copy of every Pipeline and Hazardous Materials Safety Administration (PHMSA) annual report required by U.S. Department of Transportation, Office of Pipeline Safety with the commission no later than March 15 for the proceeding calendar year in accordance with WAC 480-93-200(7).
6. Submit a "Damage Prevention Statistics" Report annually in accordance WAC 480-93-200(7)(b).
7. Submit a Construction Defects and Material Failures Report annually in accordance with WAC 480-93-200(7)(c).
8. Submit emergency contact information to appropriate agencies in accordance with WAC 480-93-200(8).
9. Provide a written Operator Qualification Plan for training, qualifying and certifying all employees and contractors in accordance with WAC 480-93-013. CCS currently is out of compliance and must:
 - a. Provide a written Operator Qualification Plan.
 - b. Provide Operator Qualification Certification for employees for each covered natural gas task including emergency response procedures.

During the inspection, neither Spokane Community College or Spokane Falls Community College had 49 CFR 192 qualified operators. Although, employees

have city and state licenses that include safety and emergency training, operator qualification certification is required in accordance with 49 CFR 192.805.

- c. Provide Operator Qualification Certification documentation for contractor employees for each covered task performed by contractors.
10. Provide and maintain a copy of Avista's Regulator Station annual inspection performed on the master meter in accordance with CFR 192.739. CCS is currently out of compliance and must provide copies of the Avista Regulator Station Annual Inspection Report for each campus.
11. Operate and maintain service regulators per manufacturer's recommendations in accordance WAC 480-93-140 and CFR 192.355. CCS is currently out of compliance and must ensure:
 - i. The vents at Spokane Falls Community College; buildings 1, 9, 11 and 13 are installed in a safe manner according to code.
 - ii. The missing regulator vent screens at the Spokane Community College at buildings 18 and 19 are replaced.
12. Develop and implement a written procedure to provide its customers Public Awareness messages twice annually in accordance with CFR 192.616 (h) and (j). CCS is currently out of compliance and must add detail to their written procedure in the O&M manual and continue to post the "Emergency Management Plan" in multiply locations in every building to satisfy the Public Awareness Program requirement.
13. Maintain a copy of Drug and Alcohol testing for all contractor employees who work on SFCC and SCC facilities in accordance with CFR 199.2.
14. Commit to annually review and update the O&M Manual in accordance with CFR 192.605(a).
15. Continue to maintain College's Emergency Management Plan in accordance with 192.615. CCS is currently out of compliance and must write detailed natural gas emergency response steps in the Emergency Plan.
16. Write detailed failure analysis procedure and establish procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination in accordance CFR 192.617. CCS is out of compliance and must write failure analysis procedures to include:
 - i. Determining the cause of the failure.
 - ii. Minimizing the possibility of recurrence.
17. Keep O&M manuals at locations where O&M activities are conducted in accordance with CFR 192.605(a)

18. Update records, maps and drawings within 6 months of completion of construction activity in accordance with WAC 480-93-018(3). CCS is out of compliance and must:
 - a. Provide updated maps, it is our understanding that CCS does not have the original maps or as built drawings of the main and service line locations, material, etc.,
 - b. provide the dates construction activities were completed and mapped, and
 - c. make updated records available to appropriate operations personnel.
19. Maintain the MAOP of the pipeline in accordance with CFR 192.619 (3), unless the original historical records are not found.
20. Conduct periodic sampling of combustible gases using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable in accordance with CFR 192.625(f). CCS is out of compliance and must provide written verification. Verification can be copies of Avista's odorant test site reading closest to each community college.
21. Conduct gas leak surveys in accordance with WAC 480-93-188. CCS is out of compliance and has committed to come into compliance by purchasing gas leak equipment and performing all annual surveys.
 - i. Leak surveys were conducted until two years ago.
 - ii. Community College of Spokane employees must be qualified to perform the leak survey task.
22. Must test gas detection instruments for accuracy at prescribed intervals (Mfct recommended interval or monthly not to exceed 45 days) in accordance with WAC 480-93-188(2)
23. Inspect and test each valve necessary for the safe operation of a the Spokane Falls Community College distribution system, (Spokane Community College does not have isolation valves) at intervals not exceeding 15 months, but at least once each calendar year in accordance with CFR 192.747.
24. Conduct annual cathodic protection surveys in accordance with CFR 192.465. CCS is out of compliance and must :
 - a. Conduct annual Cathodic Protection Surveys
 - i. Community Colleges of Spokane has not conducted a cathodic protection survey since 2008, at that time they had low readings at Spokane Falls Community College and adequate cathodic protection at Spokane Community College.
 - b. Remediate the low readings found during the 2010 inspection. Staff conducted field inspections at four buildings on each campus.
 - i. Remediation must be completed within 90 days in accordance with WAC 480-93-110 (2) at the following locations.

1. SFCC's cathodic protection system readings were low at all 4 buildings where pipe to soil reads were taken during the inspection. This indicates that the cathodic protection system at SFCC is below the required -.850 volts (V).
 - Bldg 9, -.630 V
 - Bldg 1, -.380 V
 - Bldg 11, -.365 Von both risers
 - Bldg 13, -.390 V
 2. SCC's cathodic protection system readings were low at the 2 buildings where pipe to soil reads were taken during the inspection. This indicates that the cathodic protection system at SCC that is below the required -.850 V.
 - Bldg 1, -.355 V
 - Bldg 18, -.713 V
- ii. Perform a 2010 cathodic protection survey at both campuses
 - iii. Remediate all low readings within ninety days.
25. Carry out corrosion control responsibilities with qualified personnel for the design, installation, operation, and maintenance activities in accordance with CFR 192.453. CCS is currently out of compliance and must have cathodic protection activities carried out by qualified personnel.
 26. Conduct cathodic protection pipe to soil readings each time a pipe is exposed and the wrap removed in accordance with WAC 480-93-110(8).
 27. Calibrate and test for accuracy all cathodic protection equipment and instrumentation in accordance with WAC 480-93-110(3).
 28. Conduct atmospheric corrosion inspection, at least once every 3 calendar years, but with intervals not exceeding 39 months in accordance with CFR 192.481.
 29. Conduct patrols in accordance with CFR 192.721.