

October 13, 2000

Carole J. Washburn  
Secretary, Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr., S. W.  
P.O. Box 47250  
Olympia, Washington 98504-7250

Re: **Hazardous Liquids Pipeline Safety Rulemaking**  
**Docket No. TO-000712**

Dear Ms. Washburn,

Western States Petroleum Association (WSPA) submits these comments in response to the Notice of Opportunity to File Written Comments on Hazardous Liquids Pipeline Safety Rulemaking (Docket No. TO-000712). WSPA is trade association whose members conduct most of the producing, refining, transporting and marketing of petroleum and petroleum products in the western United States. Our members include most of the companies that operate hazardous liquid pipelines in Washington State. Our comments specifically address improved safety and environmental protection for hazardous liquid pipelines in the State of Washington.

WSPA supports the use of 49 CFR 195 for pipeline design and construction. These regulations set specifications for new pipeline systems and for relocating, replacing or otherwise changing existing pipeline systems. Subjects covered in this regulation include, design, temperature, variations in pressure, internal design pressure, external loading, specifications for pipe, valves and fittings, branch fabrication, flange connections, and aboveground breakout tanks. Many specifications and standards from NFPA, AGA, API, ANSI, ASME, ASTM, and others are adopted by reference where applicable.

Pipeline design and construction considerations vary depending on many factors, including the operation (e.g., product characteristics, receiving and delivery requirements), the environment (e.g., terrain, hydrogeology), and technology. ~~Some of these factors differ by area, while other factors change over time.~~ Design and construction considerations do not vary by state or other political boundaries. To ensure safe, reliable performance the pipeline operator must integrate all of these operational, environmental, and technical variables into decisions related to the design and construction of the pipeline. ~~Prescriptive detailed, one-size-fits-all requirements could result in a false sense of security, since the most effective design and construction for one section of pipeline, may increase safety risks in another section of pipeline.~~ Whereas, a framework of national regulations which incorporates appropriate technical standards and is consistently enforced enables pipeline operators and state authorities to better implement and monitor safe practices.

A robust inspection and enforcement program would strengthen consistently safe design and construction practices. Well-trained inspectors are needed to ensure an effective inspection program.

Chairperson, Washington Utilities and Transportation Commission

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Pipelines designed and constructed to meet or exceed standards have a long life; however, the environment in which the pipeline resides may change due to natural or community actions over time. Ongoing pipeline integrity management programs, effective damage prevention programs, and proper community planning are necessary to maintain pipeline safety.

WSPA supports WUTC in their role as participants in the oversight of hazardous liquid pipelines. We encourage WUTC to adopt Federal regulations and support improvements to Federal regulations that will be effective in improving pipeline safety nation-wide, rather than promulgating state-specific requirements. Pipeline regulations must be applied equally to all pipelines within the state. Further, we encourage WUTC to strengthen inspection and enforcement of Federal regulations. WSPA is committed to working with WUTC in this inquiry process, rulemaking and other cooperative initiatives.

We appreciate the opportunity to comment.

Enclosure - 10 copies

bcc: WSPA members