

Summary of Written Comments Draft Rules
Gas Safety Rulemaking - PG-061027
June 1, 2007

ISSUE	INTERESTED PERSON	COMMENTS	
<p>1) WAC 480-93-100 Valves</p>	<p><u>Northwest Gas Association (NWGA)</u> Dan Kirschner representing Avista Utilities, Cascade Natural Gas Corp., and Puget Sound Energy.</p>	<p>1.) NWGA members appreciate Staff’s desire to clarify the intent of the rule and suggest dividing subsection (4) into two subsections. In addition, NWGA members propose edits to new subsection (5) in order to clarify the language to ensure operators can achieve compliance with the regulation and to minimize the need for rule interpretations.</p> <p>5) The Each operator must install and maintain valves for the purpose of minimizing the hazards resulting from a gas pipeline emergency and to aid in the timely control of an uncontrolled release of gas. When an operator determines In determining the minimum number and spacing of valves, the operator's primary objective shall be the protection of life and property by reducing the amount of time that a pipeline has an uncontrolled release of gas.</p> <p>(a) The operator must consider this objective in conjunction with the criteria listed in subsections (1) and (2) of this section.</p> <p>(b) Operators must also incorporate their valve programs established in subsections (1) and (2) of this section in their emergency response plan and other plans and procedures designed to protect life and property in the event of an emergency.</p> <p>(56) Operators must fully implement the requirements of subsections (2) and (3) of this section within one year of the adoption date of this rule.</p>	

2) WAC 480-93-124 Pipeline Markers	NWGA	<p>1.) NWGA members believe that further clarification of this rule is needed. Specifically, for the various crossing locations where a marker is required, the type of pipeline (i.e. service, main, transmission line) is not consistently identified. The following revisions to sections (1) (b), (c), (d), (h), and (i) are suggested based on our understanding of Staff’s intent from the rulemaking process. If these proposed edits are not consistent with Staff’s intent, NWGA members request the opportunity to discuss any differences.</p> <p>2.) For clarity, proposed edits are included for section (5) to maintain consistent language with subsection (3).</p> <p>3.) In addition, a new section (7) is proposed to specify that the marker design shall comply with 49 CFR part 192 except marker required for above ground service lines. This language was added due to the concern that the size of the pipe may prevent compliance with the lettering size and information requirements specified in part 192.</p> <p>(a) Where practical, on-over ((all mains)) <u>pipelines</u> operating above two hundred fifty psig;</p> <p>((+ii)) (b) On-Over mains and transmission lines at both sides of crossings of navigable waterways <u>(custom signage may be required to ensure visibility)</u>;</p> <p>((+iii))</p> <p>(c) On-Over mains and transmission lines at both sides of</p>	

river, creek, drainage ditch, or irrigation canal crossings where hydraulic scouring, dredging, or other activity could pose a risk to the pipeline (custom signage may be required to ensure visibility); ~~((and~~

~~(iv))~~) (d) On Over mains and transmission lines at both sides of railroad crossings;

(e) On above ground pipelines and pipeline facilities. Service risers and meter set assemblies, and operator owned piping downstream of the meter set assembly are exempt from this requirement;

(f) Over mains located in Class 1 and 2 locations;

(g) Over transmission lines in Class 1 and 2 locations, and where feasible, over transmission lines in Class 3 and 4 locations;

(h) At fence lines eOver mains in Class 1 and 2 locations and over transmission lines in Class 1 and 2 locations and where feasible in Class 3 or 4 locations at fence lines crossing private property; and

(i) Over mains in Class 1 and 2 locations and over transmission lines in Class 1 and 2 locations and where feasible in Class 3 or 4 locations at~~On~~ both sides of interstate, U.S. and state route crossings.

(2) Where markers are required on buried pipelines, operators must, if practical, place them approximately five hundred yards apart and at points of horizontal deflection of the pipeline.

(3) Where gas pipelines are attached to bridges or otherwise span an area, operators must place pipeline markers at both ends of the suspended pipeline. ~~((Each))~~ (a) Operators must conduct inspections at least annually, but not to exceed fifteen months between inspections, ~~((and maintain the markers))~~ to ensure that ~~((they))~~ markers are visible and legible.

(4) Operators must replace markers that are reported damaged or missing within forty-five days.

(5) Surveys-Inspections of pipeline markers not associated with subsection (3) of this section must be conducted ~~((as frequently as necessary))~~ at least every five calendar years but not to exceed sixty-three months, to maintain the markers ~~to~~ ensure that they markers are visible and legible ~~((, but at intervals not to exceed five years. The survey records must be kept for a minimum of ten years))~~.

(a) The operator must keep on file the last two surveys, or all surveys for the past five years, whichever number of surveys is greater.

(b) Survey records must include a description of the system and area surveyed.

(6) Operators must have maps, drawings or other sufficient records indicating class locations and other areas where pipeline markers are required.

(7) The design of pipeline markers required by this section shall conform to the requirements set forth in 192.707(d) except that pipeline markers on above ground service lines required under subsection(1)(e) of this section are

exempt from the lettering specifications in 192.707(d)(1) and from 192.707(d)(2).

[Statutory Authority: RCW 80.04.160, 80.28.210, and 80.01.040. 05-10-055 (Docket No. UG-011073, General Order No. R-520), § 480-93-124, filed 5/2/05, effective 6/2/05. Statutory Authority: RCW 80.01.040, 80.04.160, 81.04.160, and 34.05.310. 01-20-061 (Docket No. A-010827, General Order No. R-491), § 480-93-124, filed 9/28/01, effective 10/29/01. Statutory Authority: RCW 80.01.040. 92-16-100 (Order R-375, Docket No. UG-911261), § 480-93-124, filed 8/5/92, effective 9/5/92.]

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