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March 25, 2002

Ms. Carole J. Washburn, Secretary
Washington Utilities & Transportation Commission
1300 South Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

Re: Docket No. UG-011073, Gas Companies-Safety, Chapter 480-93 WAC
Comments and Questions Regarding Draft Rules Posted March 15, 2002

Dear Ms. Washburn:

As an interested party which constructs and operates pipelines in the state of Washington, I have the following comments and questions regarding the draft WAC480-93 gas safety rules that were posted on the WUTC web site on March 15, 2002 (comments are italicized):

1. **Proposed Rule 480-93-015 Odorization of gas:** In Part (1) of the proposed rule, it is stated "...in accordance with CFR 49, Part 192 excluding sections (b) (1) and section (3)." *I assume that the Part 192 regulation that is referred to is in fact 192.625. If so, then the proposed rule should be revised to include ".625" after "Part 192".*
2. **Proposed Rule 480-93-018 Maps, drawings, and records of gas facilities:** In Part (1) of the proposed rule, it is stated "...must provide key sheets for ready reference as needed." *I do not know what a "key sheet" is supposed to look like, therefore I would be unable to provide such a sheet for an inspector. Either a definition is needed for "key sheet" or some other term should be used.*
3. **Proposed Rule 480-93-080 Welder qualification:** In Part (1)(b) of the proposed rule, it is stated "...must be on site..". *Please clarify what "on site" means. Does it mean "in the welder's pocket", "in the inspector's vehicle", "at the construction office", or something else?* In Part (2)(b) of the proposed rule, it is stated "...join gas pipeline facilities must be requalified ...". *I recommend that for clarity, the sentence should be changed to "join gas pipeline facilities under part (2) must be requalified..." or to "...join gas pipeline facilities by means other than welding must be requalified...".*
4. **Proposed Rule 480-93-188: Gas leak surveys:** In part (a), it is stated that a leak survey using a gas detection instrument should be

performed covering “all mains and services”. *The proposed rule appears to apply to distribution lines only. Transmission lines carrying odorized gas are not explicitly required by 49CFR192 to have a gas leak survey performed with a gas detection instrument. If you intend to require transmission lines to be surveyed with a gas detection instrument, then that intent should be stated. If you do not intend that transmission lines carrying odorized gas must be surveyed with a gas detection instrument, then the proposed rule should be clarified.*

There are a number of other typographical errors in the proposed rules but I assume that those errors will be corrected in the final edit. I appreciate the opportunity to be allowed to comment on the proposed rules. The comments are those of Industrial Gas Services, Inc. alone and of no other entity. I can be contacted at the address and telephone numbers listed at the top of this document if you or your staff need clarification of my comments.

Very Truly Yours,

INDUSTRIAL GAS SERVICES, INC.
Steven E. Oxford
Vice President, Operations

Transmitted electronically to records@wutc.wa.gov