

POST INSPECTION MEMORANDUM

Inspector: Scott Rukke- UTC
Reviewed: David Lykken-UTC
Peer Review: _____
Follow-Up Enforcement: No Violation
PCP* PCO* NOA WL LOC
Director Approval* _____

Date: 12/03/2008

Operator Inspected: Williams Gas Pipeline **OPID:** 13845

Region: Western

Unit Address:
42612 East Christy Road
P.O. Box 330
Plymouth, WA 99346

Unit Inspected: Plymouth LNG **Unit ID:** 1155

Unit Type: Liquefied Natural Gas Plant

Inspection Type: Standard

Record Location: On-site at above address

Inspection Dates: October 20 thru 23, 2008

AFOD: 4

SMART Activity Number:

Operator Contact: Lauri Duncombe
Phone: (801) 584-6509 **Fax:** (801) 584-6988 **Emergency:** (800) 972-7733

Unit Description:

Liquefied Natural Gas Plant consisting of two storage tanks with a capacity of 348,000 bbl each and 90 feet tall. The liquefaction process consists of two, 6MMCFD cold towers, each operated as an integrated cascade loop system. The facility includes four vaporizers rated at 75MMCFD. LNG 1 was placed in operation in 1975 and LNG 2 was placed in operation in 1979. Both LNG system 1 and LNG system 2 share use of the four vaporizers. The facility is located approximately 45 minutes southwest of Pasco, Washington, west of Interstate 395 and south of Highway 82, in Plymouth, Washington. The Plymouth LNG facility uses an integrated cascade loop liquefaction process to produce and store LNG gas during the summer months as a peak shaving operation. The LNG can then be vaporized and injected into the pipeline during times of higher than normal demand. LNG boil off is re-injected into the pipeline.

Facilities Inspected:

Operations and maintenance records were reviewed. A field inspection was conducted of fire eyes, gas detectors, random CP reads, rectifier maintenance, atmospheric corrosion, supports, tank foundations and walls, ESD's, fire protection equipment, backup power, control room, fencing and emergency valves.

Persons Interviewed:

Dave Otnes
Von Studer
Lauri Duncombe
Joe Frazzini
Ron Ehrstrom
Boyd Shaw
Les Edwards

Probable Violations/Concerns:

One violation was noted. Part 193.2619(c)(2) requires that control systems intended for fire protection be inspected and tested at a frequency not to exceed 6 months. Fire eye detectors are a component of control systems intended for fire protection. William's records indicate that fire detectors were inspected and tested on 6/25/2007 and again on 1/10/2008. This exceeds the maximum 6-month timeframe.

Follow up on the history of prior offenses that are still open:

Prior Offenses (for the past 5 years)		
CPF #	What type of open enforcement action(s)?	Status of the regulations(s) violated (Reoccurrence Offenses, Implement a NOA Revision, Completion of PCO or CO, and etc...)

Recommendations:

Recommend that PHMSA issue a warning letter with no penalty or further enforcement action.

Comments:

Part 193.2619(c)(2) is one of the few remaining codes that does not have a grace period. Williams was very cooperative and immediately took steps to change the scheduling frequency of the fire detectors.

Attachments:

- Williams' Plymouth facility maintenance records for fire detection system components, Williams form WGP 0023 dated 6/25/2007 and 1/10/2008.
- IOCS
- Form 4-Standard Inspection Report for an LNG
- Form 15-OQ Field Inspection Protocol
- Violation Report