Georgia-Pacific
CONSUMER PRODUCTS (CAMAS) LLC
401 NE Adams Street, Camas, WA 98607
Telephone: (360) 834-3021

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

August 4, 2009

Ms. Anne F. Soiza
Pipeline Safety Director
Washington Utilities & Transportation Commission
P. O. Box 47250
Olympia, WA 98504-7250

Dear Ms. Soiza:

Pursuant to Docket PG-090033 and your July 21, 2009 letter, we are responding to the July 2009 Pipeline Integrity Management Program inspection. The inspection findings and our proposed responses are presented in Table 1. These changes will be implemented pending the outcome of your review.

In the interim, if you have any questions or need additional information, please contact Steve Young at 360-834-8322 or steve.young@gapac.com.

Sincerely,

Gary W. Kaiser
Vice President

GWK/jm

Attachment

cc:
S. C. Ringquist - GP/Camas
S. R. Young - GP/Camas
R. F. Rogers - CPE/West Linn

TABLE 1. 2009 GP-CAMAS PIPELINE INTEGRITY MANAGEMENT PROGRAM (IMP) INSPECTION: FINDINGS AND PROPOSED RESPONSES

1. **Baseline Assessment Plan**

49 CFR §192.919(e) What must be in the baseline assessment plan?

An operator must include each of the following elements in its baseline assessment plan:

(e) A procedure to ensure that the baseline assessment is being conducted in a manner that minimizes environmental and safety risks.

Finding(s):

Section 2.6 of GP's IMP addresses Consideration of Environmental and Safety Risks. This language was general and did not identify or address public and employee safety issues. More detail should be provided or referenced to meet this requirement.

Proposed Response:

2.6 Consideration of Environmental and Safety Risks

Georgia-Pacific has procedures to ensure that it conducts its baseline assessments in a manner that minimizes environmental and safety risks. Steps to be taken include 1) protection of life and 2) minimizing adverse impacts to the environment (i.e. surface or atmospheric).

This section refers to current company operator qualification procedures and the Camas Mill Safety Rules, which promote safety and environmental best practices.

2.6.1 Minimizing Environmental and Safety Risks During Baseline Assessments and Reassessments

Direct Assessment

The Direct Assessment (DA) methodology was determined to be the most effective technique to identify the threats present along the GP Camas Pipeline. The Indirect Assessment process is considered to be a non invasive inspection technique that does not impact the ground surface or put the public at risk. The direct examination phase involves excavation of anomalies identified using the Indirect Assessment process. Workers associated with the excavation and inspection are required to comply with the personal protection equipment requirements specified in Section 1 of the Camas Mill Safety Rules. The Camas Mill Safety Rules also address excavation safety in attachment "A" and document the excavation safety process using the Excavation Permit located in Appendix "E". If a natural gas emergency is encountered when examining an anomaly, the emergency response procedure in Section 2 of the Natural Gas Pipeline Operations, Maintenance and Procedures Manual will govern the response.

There are no environmentally sensitive areas within the High Consequence Area and there are no liquid chemicals utilized in the daily operation of the Camas Mill Pipeline. The only exposure would be a release associated with the excavation equipment or support vehicles when performing the direct examination excavation process. In the event of a hazardous material release along the pipeline right of way, the response will be dictated by the Camas Mill Environmental Response Procedure.

2.6.2 Hydrotesting

Hydrotesting will be performed as described in the Section 7 of the Operations, Maintenance and Procedures Manual.

2. Remediation

49 CFR §192.933(d) What actions must be taken to address integrity issues?

(d) Special Requirements for scheduling remediation.-(1) Immediate repair conditions. An operator's evaluation and remediation schedule must follow ASME/ANSI B31.8S, section 7 in providing for immediate repair conditions. To maintain safety an operator must temporarily reduce operating pressure in accordance with paragraph (a) of this section or shut down the pipeline until the operator completes the repair of these conditions.

Finding(s):

Section 5.1.3 of the GP's IMP correctly states that an 80% pressure reduction or pipeline shutdown will occur when an immediate repair condition is discovered. This can be a complex process which should be described in a detailed procedure. This will help ensure that the shutdown/pressure reduction process is carried out in a systematic and safe manner.

Proposed Response:

5.1.3 Response to Immediate Repair Conditions

In the event that an integrity assessment identifies an anomaly that is classified as an immediate repair, the following process will be implemented immediately upon making the repair determination:

- Record the actual pipeline operating pressure.
- Multiply the actual pipeline operating pressure by 0.8 to determine the temporary reduced operating pressure. (See Note "A")
- Contact Williams Pipeline West Control Room in Salt Lake and request that the regulators at the Washougal Gate Station be adjusted to the temporary reduced operating pressure. NOTE: This notification shall be made by the Environmental Program Director or their designee.

Note "A": In the event that the integrity assessment has sufficient resolution to determine the anomaly size and depth, this information will be used to evaluate the revised safe operating pressure using ASME B31G or RSTRNG. This methodology will supersede the 20% pressure reduction as it is based upon field proven engineering analysis.

The GP Camas Mill reserves the right to take the pipeline out-of-service in lieu of the 20% pressure reduction. If this response is selected, the following procedure will be implemented:

- Notify the clockroom that the natural gas pipeline will be taken out of service and that residual gas will be discharged to atmosphere.
- The Clockroom will notify Camas and Washougal Emergency Services that natural gas will be discharged to atmosphere.
- Notify Williams Pipeline West that the GP Camas Lateral will be taken out-of-service.
- Notify the Steam Plant Control Room (x-3451) that the natural gas pipeline will be taken out of service and that the remaining fuel in the pipeline will need to be burned to near zero pressure.
- Dispatch a Pipeline Covered Worker to the Williams Washougal Gate Station to close the Williams custody valve, 8" Mainline valve #1 and 4" bypass valve #1B.
- When the pipeline pressure is reduced to approximately 10 psi, close 10" mainline valve #3, 4" bypass valve #3b and all 3 meter set valves.

The pipeline at this point will contain 100% natural gas at 10 psi. To blow down and evacuate the natural gas from the pipeline, follow OQ-012 Procedures #1 and 2. Once the pipeline is free of combustibles, the repair process may commence. Upon completion of the repair follow OQ-012 Procedure #3 to introduce natural gas back into the pipeline.

3. **Quality Assurance**

49 CFR §192.915(a) What knowledge and training must personnel have to carry out an integrity management program?

(a) Supervisory personnel. The integrity management program must provide that each supervisor whose responsibilities relate to the integrity management program possesses and maintains a thorough knowledge of the integrity management program and of the elements for which the supervisor is responsible. The program must provide that any person who qualifies as a supervisor for the integrity management program has appropriate training or experience in the area for which the person is responsible.

Finding(s):

Section 12.6.1 of the GP's IMP addresses supervisory qualifications. The section was general and did not define what appropriate training and experience is. Additional detail is needed to define how this requirement will be met.

Proposed Response:

12.6.1 Integrity Management Program Responsibilities and Authorities

The Reliability Leader is accountable for administration of the GP Camas Mill Integrity Management Plan. This accountability includes retaining the services of a qualified Pipeline Integrity Engineer to manage and execute the IMP Plan. A qualified Pipeline Integrity Engineer will possess the following technical and practical attributes:

- Professional Engineering certification as they will make fitness for service determinations.
- Transmission pipeline construction experience.
- Transmission pipeline maintenance and repair experience.
- Transmission pipeline anomaly field evaluation experience, fitness for service determination experience and anomaly repair and mitigation experience.
- Thorough understanding of the hydrostatic testing, inline inspection, and direct assessment methodologies. This knowledge should range from performing the evaluation to evaluating / interpreting the data generated by the inspection method.
- Thorough understanding of CFR Part 192 including Subpart "O"

The flow of authority through the organization in descending order is: Vice President, Environmental Leader, Reliability Leader, and Pipeline Integrity Engineer.