



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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(360) 664-1160 • TTY (360) 586-8203

Ref. No. Docket PG-101397

**CERTIFIED MAIL**

December 15, 2010

Irina Robinson  
Mount Vernon Terrace Apartments  
3118 S Mount Vernon  
Spokane, WA 99207

Dear Ms. Robinson:

**RE: 2010 Master Meter System Standard Inspection – Mount Vernon Terrace Apartments**

On September 20, 2010 the Washington Utilities and Transportation Commission's (commission) pipeline safety staff conducted a Natural Gas Master Meter (MM) Standard inspection of the Mount Vernon Terrace Apartments located at 3118 S Mount Vernon, Spokane, WA.

Prior to 2010, the commission conducted courtesy inspections at the Mount Vernon Terrace apartments. Mount Vernon Terrace Apartments committed to come into compliance with all federal and state regulations found on the attached report and to remediate the out of compliance items. The out of compliance items need to be corrected in a timely manner.

Mount Vernon Terrace Apartment was also informed that a MM Integrity Management program must be developed and implemented no later than August 2, 2011 in accordance with CFR 192.1015.

**Your response needed**

Please review the attached report and respond in writing no later than January 18, 2011. The letter of intent should include:

1. A statement that Mount Vernon Terrace Apartments agrees to comply with applicable Federal (49 CFR 192) and State WAC (480-93) rules and to remedy the out of compliance items identified in the attached report; and,
2. A plan, including timeframes, to complete all out of compliance items.



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If you have any questions, or if we may be of any assistance, please contact Patti Johnson at (360) 870-4915 or (360) 664-1266. Please refer to Dockets PG-101397 in any future correspondence regarding this inspection.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Lykken', written over a horizontal line.

David D. Lykken  
Pipeline Safety Director

cc. Ray Allen

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**  
**2010 Natural Gas Master Meter Pipeline Safety Inspection**  
**Mount Vernon Terrace Apartments, Spokane, WA**  
**Docket PG-101397**

Master Meter regulations are found in Title 49, CFR Part 192, 199, and WAC 480-93. The inspection included an inspection of operation and maintenance records, emergency response plan, and field inspection of the pipeline facilities. The following is a list of requirements that the Mount Vernon Terrace Apartments must comply with.

1. Submit annual reports in accordance with CFR 191.5.
2. Provide Telephonic Reports to UTC Pipeline Safety Incident Notification (Within 2 hours) in accordance with WAC 480-93-200(1).
3. Provide Telephonic Reports to UTC Pipeline Safety Incident Notification (Within 24 hours) in accordance with WAC 480-93-200(2).
4. Provide a 30 day written incident report for each telephonic report in accordance with WAC 480-93-200(4).
5. Provide a copy of every Pipeline and Hazardous Materials Safety Administration (PHMSA) annual report required by U.S. Department of Transportation, Office of Pipeline Safety with the commission no later than March 15 for the proceeding calendar year in accordance with WAC 480-93-200(7).
6. Submit a "Damage Prevention Statistics" Report annually in accordance WAC 480-93-200(7)(b).
7. Submit a Construction Defects and Material Failures Report annually in accordance with WAC 480-93-200(7)(c).
8. Submit emergency contact information to appropriate agencies in accordance with WAC 480-93-200(8).
9. Develop a written Operator Qualification Plan for training, qualifying and certifying all employees and contractors in accordance with WAC 480-93-013. Mount Vernon Terrace Apartments currently is out of compliance and must:
  - a. Provide a written Operator Qualification Plan.
  - b. Provide Operator Qualification Certification for employees for each natural gas task including emergency response procedures.
  - c. Provide Operator Qualification Certification documentation for contractor employees for each tasks performed by contractors in the future.

10. Provide and maintain a copy of Avista's Regulator Station annual inspection, performed on the master meter in accordance with CFR 192.739. Mount Vernon Terrace Apartments is out of compliance and must provide copies of the Avista Regulator Station Annual Inspection Report for each Mount Vernon Terrace Apartments.
11. Operate and maintain service regulators per manufacturer's recommendations in accordance WAC 480-93-140 and CFR 192.355.
12. Develop and implement a written procedure to provide its customers Public Awareness messages twice annually in accordance with CFR 192.616. Mount Vernon Terrace Apartments is not in compliance and must:
  - a. Develop a Public Awareness Plan. Currently Mount Vernon Terrace Apartments does not have one.
  - b. Add a written Public Awareness Procedure in the O&M manual.
13. Maintain a copy of Drug and Alcohol testing for all contractor employees who work on Mount Vernon Terrace Apartments facilities in accordance with CFR 199.2.
14. Commit to annually review and update the O&M Manual in accordance with CFR 192.605(a).
15. Maintain written Emergency Management Plan. Mount Vernon Terrace Apartments is out of compliance and must include natural gas emergency response steps in the O&M Emergency Plan CFR 192.615.
16. Write detailed failure analysis procedure and establish procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination in accordance CFR 192.617. Mount Vernon Terrace Apartments is not in compliance and must include failure analysis procedures in the O&M which address:
  - a. Determining the cause of the failure.
  - b. Minimizing the possibility of recurrence.
17. Continue to keep O&M manual at locations where O&M activities are conducted in accordance with CFR 192.605(a)
18. Update records, maps and drawings **within** 6 months of completion of construction activity in accordance with WAC 480-93-018(3). Mount Vernon Terrace Apartments must:
  - a. Complete documentation for all operations and maintenance requirements required by these regulations.
  - b. Provide detailed maps.
  - c. Provide the dates construction activities were completed and mapped, and
  - d. Make records available to appropriate operations personnel.

19. Maintain the MAOP of the pipeline in accordance with CFR 192.619 (3). If the original historical records are not found, Mount Vernon Terrace Apartments MAOP is 2 psig.
20. Conduct periodic sampling of combustible gases using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable in accordance with CFR 192.625 (f). Mount Vernon Terrace Apartments is out of compliance and must provide written verification. Verification can be copies of Avista's odorant test site reading closest to Mount Vernon Terrace Apartments.
21. Continue to conduct gas leak surveys in accordance with WAC 480-93-188.
22. Continue to test gas detection instruments for accuracy at prescribed intervals (Mfct recommended interval or monthly not to exceed 45 days) in accordance with WAC 480-93-188(2).
23. Inspect and test each valve necessary for the safe operation of the Mount Vernon Terrace Apartments distribution system at intervals not exceeding 15 months, but at least once each calendar year in accordance with CFR 192.747. Mount Vernon Terrace Apartments has the shut off on the master meter and service valves on all risers. There are no distribution isolation valves.
24. Continue to conduct annual cathodic protection surveys in accordance with CFR 192.465.
25. Continue to carry out cathodic protection responsibility with a qualified person. Design, installation, operation, and maintenance activities must be performed in accordance with CFR 192.453.
26. Conduct cathodic protection pipe to soil readings each time a pipe is exposed and the wrap removed in accordance with WAC 480-93-110(8).
27. Calibrate and test for accuracy all cathodic protection equipment and instrumentation in accordance with WAC 480-93-110(3).
28. Continue to conduct atmospheric corrosion inspection, at least once every 3 calendar years, but with intervals not exceeding 39 months in accordance with CFR 192.481.
29. Conduct patrols in accordance with CFR 192.721.