



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 \* Olympia, Washington 98504-7250

(360) 664-1160 \* TTY (360) 586-8203

Ref. No. Docket PG-101598

**CERTIFIED MAIL**

December 15, 2010

Raeanne Tuell & Rex Bradley  
Campbell Court Apartments  
415 N 2<sup>nd</sup> Ave,  
Pasco, WA 99301

Dear Ms. Tuell and Mr. Bradley:

**RE: 2010 Natural Master Meter System Standard Inspection – Campbell Court Apartments**

On October 18, 2010 the Washington Utilities and Transportation Commission's (commission) pipeline safety staff conducted a Natural Gas Master Meter (MM) Standard inspection of the Campbell Court Apartment facility located at 415 N 2<sup>nd</sup> Ave, Pasco, WA.

Prior to 2010, the commission conducted courtesy inspections at the Campbell Court Apartments. Campbell Court 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.

Campbell Court Apartments was also informed that the 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 Campbell Court Apartments agrees to the commitments made in the attached report to come into compliance with all applicable federal (49 CFR 192) and WAC rules (480-93) and
2. A plan including timeframes, to come into compliance with all 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-101598 in any future correspondence regarding this inspection.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Lykken', with a long horizontal flourish extending to the right.

David D. Lykken  
Pipeline Safety Director

Enclosure

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**  
**2010 Natural Gas Master Meter Pipeline Safety Inspection**  
**Campbell Court Apartments, Pasco, WA**  
**Docket PG-101598**

Master Meter regulations are found in Title 49, CFR Part 192, 199, and WAC 480-93. The inspection included a review of operation and maintenance records, emergency response plan, and field inspection of the pipeline facilities. The following is a list of requirements that Campbell Court 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 written Operator Qualification Plan for training, qualifying and certificating all employees and contractors in accordance with WAC 480-93-013. Campbell Court Apartments is out of compliance and must:
  - a. Provide a written Operator Qualification Plan.
  - b. Provide Operator Qualification Certification for employees for each covered natural gas task including emergency response procedures.
  - c. Provide Operator Qualification Certification documentation for contractor employees for each task performed by contractors.

10. Provide and maintain a copy of Cascade Natural Gas's (CNG) annual Regulator Station Annual Inspection Report, performed on the master meter in accordance with CFR 192.739. Campbell Court Apartments is out of compliance and must provide a copy of the 2010 CNG Annual Regulator Station Annual Inspection Report.
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.
13. Maintain a copy of Drug and Alcohol testing for all contractor employees who work on Campbell Court 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. Develop and implement a written Emergency Management Plan. Plan should include natural gas emergency response steps in accordance with 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. The failure analysis procedures must include:
  - a. procedures for determining the cause of the failure, and
  - b. procedures to minimize the possibility of recurrence
17. Keep O&M manuals 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). The master meter operator must:
  - a. Complete documentation for all operations and maintenance requirements. Currently, Campbell Court Apartments does not have any information regarding their master meter system.
  - b. Provide detailed maps. Campbell Court Apartments does not have a map of their master meter system
  - c. Have dates construction activities were completed and mapped.
  - d. Make records available to appropriate operations personnel.
19. Maintain the MAOP of the pipeline in accordance with CFR 192.619 (3).

20. Have written verification from CNG that the natural gas has the proper concentration of odorant in accordance with CFR 192.625 (f). Campbell Court Apartments must provide documentation that the concentration of odorant meets specification. Campbell Court Apartments can use a copy of CNG Odorant Test Site Report closest to the apartments.
21. Conduct gas leak surveys in accordance with WAC 480-93-188. Campbell Court Apartments has never conducted a leak survey.
22. 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. Test and inspect each valve necessary for the safe operation of a the Campbell Court Apartments distribution system, at intervals not exceeding 15 months, but at least once each calendar year in accordance with CFR 192.747.
24. Conduct annual cathodic protection surveys in accordance with CFR 192.465. Campbell Court Apartments has pre code steel pipe. Campbell Court Apartment does not have cathodic protection on its natural gas system and must install a system and conduct surveys annually. The cathodic protection system must be installed in 2011.
25. Carry out cathodic protection responsibility with a qualified person. Design, installation, operation, and maintenance must be performed in accordance with CFR 192.453. Campbell Court Apartments currently does not have a cathodic protection qualified person, and cathodic protection requirements are not being met.
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. Conduct atmospheric corrosion inspection, at least once every 3 calendar years, but with intervals not exceeding 39 months in accordance with CFR 192.481. Campbell Court Apartments has bare steel piping which is partially buried or lying on the ground. All corrosion must be evaluated and remediated.
29. Conduct patrols in accordance with CFR 192.721.