

**Summary of Written Comments  
Gas Pipeline Safety Rulemaking  
Operation and Maintenance  
For April 5, 2002 Comments  
UG-011073**

**Revised: September 11, 2002**

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
<p>1) WAC 480-93-015 Odorization of Gas</p>	<p>Northwest Industrial Gas Users Energy Advocates, LLP</p>	<p>NWIGU is in general agreement with the concerns raised by Industrial Gas Services, Inc. in its March 25, 2002 comments on this draft section concerning Operation and Maintenance.</p> <p>In proposed WAC 480-93-015, NWIGU is unclear as to what sections of 49 CFR Part 192.625 are being excluded by “excluding sections (b) (1) and section (3)”. Would staff please clarify what is being proposed for an odorization requirement that is different than federal standards? Is it b(1) and b(3) of 49 CFR Part 192.625? NWIGU would generally prefer that the state rules be consistent with the federal requirements whenever possible, but if the final rules include a different standard than the federal requirements, it would also be beneficial to spell that difference out in substance.</p>	<p>Staff proposes to clarify this existing rule by removing the exclusionary sections of 49 CFR Part 192.625. The intent of WAC 480-93-015 is to require all gas to be odorized.</p> <p>Yes, (b)(1) &amp; (b)(3) are intended to be excluded.</p>

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2) WAC 480-93-018 Maps, Drawings, and Records of Gas Facilities.	NW Natural, Avista Utilities & Cascade Natural Gas	(2) CNG would like to know why sniff tests must be performed at least monthly.	(2) To clarify the term “Periodic Sampling” and to provide some uniformity.
		(4) CNG would like to know why five years of record storage is deemed necessary.	(4) Staff would like to discuss at stakeholder meeting.
	Puget Sound Energy	(1) Paragraphs (b)(1) and (b)(3) are used by DOT to exclude pipeline sections. PSE recommends the above changes to make clear that the UTC does not allow the exclusions granted by DOT in paragraphs (b)(1) and (b)(3).	(1) Staff would like to discuss at stakeholder meeting.
	Steven E. Oxford, Vice President, Operations Industrial Gas Services, Inc.	<i>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”.</i>	Staff concurs.
	Northwest Industrial Gas Users Energy Advocates, LLP	(3) Is proposed WAC 480-93-018 (3) intended to be a record update requirement or a filing requirement with the Commission? NWIGU recommends a record update requirement open for Staff inspection during audit.	(3) WAC 480-93-018 is intended to ensure records, maps & drawings are updated, so that pipeline personnel have the most current information. Filing requirement is applicable to providing the commission with

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	<p data-bbox="426 472 695 574">NW Natural, Avista Utilities &amp; Cascade Natural Gas</p> <p data-bbox="426 1057 688 1089">Puget Sound Energy</p>	<p data-bbox="831 472 1587 721">(1) In order to support the industry’s heightened security efforts subsequent to September 11, 2001, NW Natural strongly suggests that all documents pertaining to the exact location of pipeline facilities must not be provided to the public or any public agency. These documents are, however, available for review by Staff.</p> <p data-bbox="831 764 1587 1013">(3) NW Natural, CNG and Avista Utilities suggest deleting this requirement or limiting it to transmission lines and mains. Updating all the documentation for the thousands of services added within the 6-month time frame would be excessively burdensome particularly if there have been no charges to the records.</p> <p data-bbox="831 1057 1587 1273">(1) In order to support the industry’s heightened security efforts subsequent to September 11, 2001, all documents pertaining to the exact location of pipeline facilities must not be provided to the public or any public agency. We recommend the above changes for clarity.</p>	<p data-bbox="1675 253 1986 428">maps per statute. Staff will discuss this proposed rule and its intent at the stakeholder meeting.</p> <p data-bbox="1619 472 1961 574">(1) Staff would like to discuss at stakeholder meeting.</p> <p data-bbox="1619 764 1997 1013">(3) Staff feels that 6 months to update records is reasonable. Staff disagrees that this requirement be limited to transmission lines &amp; mains.</p> <p data-bbox="1619 1057 1961 1159">(1) Staff would like to discuss at stakeholder meeting.</p>

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3) WAC 480-93-080 Welder Identification and Qualification Certificates.	Steven E. Oxford, Vice President, Operations Industrial Gas Services, Inc.	<p>(2) PSE would like to discuss how paragraphs (2) relates to this section (480-93-018) on maps, drawings, and records. It appears to have come out of rule 480-93-180. We recommend deleting this section here and making it a separate rule.</p> <p>(3) PSE would like to discuss this with UTC Staff.</p> <p><i>In Part (1) of the proposed rule, it is stated "... must provide key sheets for ready reference as needed."</i> 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.</p>	<p>(2) Staff will take this into consideration. Rule to be reviewed.</p> <p>(3) Staff agrees.</p> <p>It is in the original rule. Staff will take into consideration, and review the rule.</p>
	NW Natural, Avista Utilities & Cascade Natural Gas	<p>(1) Avista Utilities suggests that Appendix C of Part 192 be included in this proposed rule since it is an acceptable procedure under federal pipeline safety code. CNG requests that Staff elaborate why the 49 CFR 192 Appendix C requirements are not acceptable for pipelines operating with a hoop stress under 20% SMYS.</p> <p>(1a) CNG requests that Staff defines "essential variables".</p> <p>(2a) Please define joining procedures. Are they limited to fusing or do they include mechanical joining techniques?</p>	<p>(1) Staff would like to discuss at stakeholder meeting.</p> <p>(1a) Staff will define.</p> <p>(2a) Staff considers mechanical joining techniques as part of joining procedures. Staff would like to further discuss at stakeholder meeting.</p>

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	Puget Sound Energy	<p>(1) <del>All welding procedures and welders must be qualified to API Standard 1104 or section IX of the ASME Boiler and Pressure Vessel Code.</del> Each welder qualification test result must be recorded and kept for a period of 5 years.  <b>Comments:</b> If the intent is to disallow Appendix C of Part 192, PSE strongly disagrees and would like to discuss with the Commission Staff. There is no value added by the proposed language of the first sentence since DOT 192.227 stipulates welder qualification requirements and welding procedures are covered in 192.225. Qualifying a welder under 192.227 requires a qualified welding procedures as explicitly stated in API 1104 Section 2 and Article II of section IX of the ASME Boiler and Pressure Vessel Code.</p> <p>(2)(a) Operator must use <u>appropriate</u> testing equipment <del>necessary</del> to measure the essential variables during welder qualification or requalification, and also for procedure qualification or requalification. All essential variables must be recorded <del>as performed</del> during <del>the welding qualification</del> <u>these processes</u>.  <b>Comments:</b> PSE recommends the above changes for clarity.</p> <p>(2) Duplicate of DOT 192.273(b). No value added.</p> <p>(2a) Please define joining. Does this include everything covered under 192 Subpart F – <i>Joining Of Materials Other Than by Welding</i>, just plastic pipe (all joining methods), or just plastic pipe heat fusion method?</p>	<p>(1) Staff would like to discuss at stakeholder meeting.</p> <p>Staff would like to discuss at stakeholder meeting.</p>

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4) WAC 480-93-120 Exposed Pipelines.	<p data-bbox="426 545 730 683">Steven E. Oxford, Vice President, Operations Industrial Gas Services, Inc.</p> <p data-bbox="426 984 695 1084">NW Natural, Avista Utilities &amp; Cascade Natural Gas</p> <p data-bbox="426 1166 688 1198">Puget Sound Energy</p>	<p data-bbox="806 253 1562 505">(2b) (DOT 192.285(c) covers requalification for plastic pipe joining and the operator qualification requirements specified in 192.805(b) cover requalification for all non-welded pipe joining. The proposed language would disallow performance history review for plastic pipe joining, as allowed by the federal rule in 192.285(c).</p> <p data-bbox="806 545 1587 683"><i>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?</i></p> <p data-bbox="806 724 1587 943"><i>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..."</i></p> <p data-bbox="806 984 1577 1089">(1) The term "protective measures" is unclear. The issue of marking pipelines is included in WAC 480-93-124. Suggest deleting this rule.</p> <p data-bbox="806 1166 1556 1271">We would like to discuss the intent paragraph (1) of the proposed rule. We believe paragraph (2) should be part of this rule not 480-93-124 for clarity.</p>	<p data-bbox="1619 253 1955 358">(2b) Staff would like to discuss at stakeholder meeting.</p> <p data-bbox="1619 545 1990 683">The intent is to have the procedures at the location where the procedure is being performed.</p> <p data-bbox="1619 724 1885 797">Staff to discuss at stakeholder meeting.</p> <p data-bbox="1619 984 1965 1122">(1) The intent is that aboveground facilities be protected from physical damage.</p> <p data-bbox="1619 1166 1961 1198">Staff will review proposal.</p>

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<p>5) WAC 480-93-124 Pipeline Markers.</p>	<p>NW Natural, Avista Utilities &amp; Cascade Natural Gas</p>	<p>Line markers for mains and transmission lines is the title of 49 CFR Part 192 section 707. This is referenced in paragraph (1) of the proposed rule.</p> <p>(1) The term “deflection” infers unsatisfactory loading of the pipe to cause direction away from its normal course. Application of this rule to all fence lines would be disruptive, impractical and expensive.</p> <p>(2) NW Natural and Avista Utilities suggest revising the timeframe for replacing line markers to 45 days. Consistency throughout the proposed rules would be beneficial. CNG requests Staff to comment on why a prescribed replacement schedule is deemed necessary. Avista Utilities and CNG would like to know what the basis is for proposing a separate annual marker survey program.</p> <p>(3) CFR Part 192 section (709(c) requires that similar records be kept for a minimum of 5 years. Six years could cause a duplication of efforts by staff inspecting records in two cycles. Suggest keeping records for 5 years for consistency and inspection efficiency.</p>	<p>(1) Staff feels the definition for the term “deflection” is appropriate.</p> <p>(2) Staff agrees with the 45 day timeframe. Staff is attempting to clarify the requirement and frequency of 480-93-120.</p> <p>(3) Staff agrees with the proposed 5 year requirement.</p>

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	Puget Sound Energy	<p>(1) <del>(4)</del> Pipeline Line markers required by 192.707 must be placed: at</p> <p>(a) at all railroad, road, irrigation, and drainage ditch crossings; <del>and at</del></p> <p>(b) at all fence lines where a pipeline crosses private property;</p> <p>(c) Pipeline Line markers must be placed approximately <del>five hundred</del> 500 yards apart, if practical; <del>and at points of deflection of the pipeline.</del></p> <p>(d) where the line changes direction.</p> <p>Exceptions to this rule must conform to 49 CFR, Part 192.707(b).</p> <p><b>Comments:</b> We recommend the above changes for clarity.</p> <p>(2) All gas pipeline attached to bridges or otherwise spanning an area must have pipeline markers at both ends of the suspended pipeline. Each gas company must annually inspect and maintain the markers to ensure they are visible and legible. Markers that are reported damaged and missing must be replaced within <del>30</del> 45 days.</p> <p><b>Comments:</b> We recommend combining this paragraph with 480-93-120.</p> <p>(3) Operators need the flexibility to combine line marker surveys with other required surveys (i.e. leak surveys) for efficiency. Also, a records retention of 5 years would be consistent with CFR Part 192 section 709 (c).</p>	<p>(1) Staff would like to discuss at stakeholder meeting.</p> <p>(2) Staff would like to discuss at stakeholder meeting.</p> <p>(3) Staff agrees.</p>



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<p>6) WAC 480-93-155 Increasing Maximum Operating Pressure.</p>	<p>NW Natural, Avista Utilities &amp; Cascade Natural Gas</p> <p>Puget Sound Energy</p>	<p>(8) Uprates are generally performed while pipelines are in operation and it is not feasible or desirable to take them out of service to test. Pressure testing a pipeline with natural gas to 1 ½ times the new MAOP may not be in the best interest of public safety. Suggest deleting statement (8).</p> <p>(1) Each gas company must submit to the Commission for <del>approval</del> <u>review</u>, complete written plans and drawings at least 45 days before uprating to a maximum allowable operating pressure (MAOP) greater than <del>sixty pounds per square inch gauge</del> <u>60 psig</u>. The plan must include a review of the following:</p> <p>(4a) All affected gas facilities, including pipe, fittings, valves, and other affected equipment, with their manufactured design operating pressure and specifications;</p> <p>(2b) Original design and construction standards;</p> <p>(3c) All previous operating pressures and length of time at that pressure;</p> <p>(4d) All leaks, regardless of cause, and the date and method of repair;</p> <p>(5e) All upstream and downstream regulators and relief valves;</p> <p>(6f) All cathodic protection readings on mains for the past three years or three most recent inspections, whichever is longer, and the most recent inspection on each attached service line, which is electrically isolated; and</p>	<p>(8) Staff would like to discuss at stakeholder meeting.</p> <p>These suggested changes will be discussed at the stakeholder meeting. Staff is discussing the approval process vs. review process with management and AG's office.</p>

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7) WAC 480-93-180 Plan of Operations and Maintenance Procedures; Emergency Policy; Reporting Requirements.	NW Natural, Avista Utilities & Cascade Natural Gas	<p>(7g) <del>Additional</del> Records deemed necessary to evaluate the pressure increase.</p> <p>(82) <del>The proposed MAOP Upgrades of the pipeline must be based substantiated by on a previous strength test, that would substantiate the must MAOP. When there is no documented history of strength tests, one must be conducted in conjunction with the uprate. When a previous test does not substantiate the proposed MAOP, a new test must be conducted before or in conjunction with the uprate.</del>  <u>Comments:</u> We recommend the above changes for clarity.</p> <p>Inspection is included in 49 CFR Part 192, subparts I, L and M. Suggest deleting this term or defining where the term exceeds Part 192 requirements.</p>	<p>(7g) Staff needs additional information from the stakeholder for the suggested change.</p> <p>(82) Staff would like to discuss at stakeholder meeting.</p> <p>Staff agrees.</p>
8) WAC 480-93-185 Gas Leak Investigations.	NW Natural, Avista Utilities & Cascade Natural Gas	<p>(1) The above statement designating authority to the WUTC is contradictory to federal regulation. 49 CFR Part 192 section 617 states:</p>	<p>(1) Staff would like to discuss at stakeholder meeting.</p>

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		<p data-bbox="890 253 1591 467"><i>“Each operator shall establish procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of recurrence.”</i></p> <p data-bbox="890 508 1591 610">This definition of jurisdiction may prevent the operator from complying with the requirements of Part 192.617.</p> <p data-bbox="890 654 1591 868">The leak grading requirements belong in 480-93-186. Suggest this language be struck out. Under some circumstances, improved or additional information will legitimately support changing a grade 1 or 2 leak to a grade 3 leak without a physical repair having been made to the pipeline facility.</p> <p data-bbox="810 911 1591 1235">(2) NW Natural and Avista Utilities suggest deleting the odor sniff card requirement. Problems have occurred with the customer disposing of the card and creating false odor calls based on these cards. We also suggest deleting the requirement of having the adult person occupying the premises to sign the gas company work order based on legal counsel’s suggestion given that the customer is not usually aware of what they are signing and why.</p>	<p data-bbox="1623 654 1997 724">Staff would like to discuss at stakeholder meeting.</p> <p data-bbox="1623 911 1982 1013">(2) Staff is willing to discuss alternative notification procedures.</p>

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<p>9) WAC 480-93-18601 Table 1--Leak Classification and action criteria--Grade Definition—Priority of Leak Repair--Examples.</p>	<p>Puget Sound Energy</p>	<p>(1) CFR 192.617 requires operators to establish procedures for analyzing accidents and failures. PSE believes it is more appropriate for such procedures to specify how a company works with the Commission during such incidents. Preservation of evidence is an important issue but the prescriptive language of the proposed rule is counterproductive and could hinder a company’s ability to properly respond to an emergency.</p> <p>PSE also believes the final sentence is more appropriately placed in 480-93-186.</p>	<p>(1) Staff would like to discuss at stakeholder meeting.</p>
	<p>NW Natural, Avista Utilities &amp; Cascade Natural Gas</p>	<p>(1) <b><u>Grade 1-(Priority of Leak Repair)</u></b> <b><u>Comments:</u></b> Placing this table in table format will keep the margins aligned correctly.</p> <p>(2) <b><u>Grade 1-(Examples)</u></b> <b><u>Comments:</u></b> Examples become prescriptive when performance language is used, such as 80% LEL or six months. Suggest removing specific values from the examples in this column.</p> <p>(3) <b><u>Grade 2 -(Priority of Leak Repair)</u></b> <b><u>Comments:</u></b> Placing this table in table format will keep the margins aligned correctly.</p>	<p>(1) Staff will review.</p> <p>(2) Staff disagrees. Language has not changed from current rule.</p> <p>(3) Staff will review.</p>

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		<p>(4) <b><u>Grade 2 -(Priority of Leak Repair)</u></b>  <del>It should be recognized that Grade 2 leaks will vary greatly in degree of potential hazard. There will be some Grade 2 leaks, which when evaluated by the above criteria, will justify scheduled repair within the next 5 working days. Others will justify repair within 30 days. These situations shall be brought to the attention of the individual responsible for scheduling leakage repair at the end of the working day.</del>  <b><u>Comments:</u></b> The above statement is unnecessary.</p> <p>(5) <b><u>Grade 2-(Examples)</u></b>  <b><u>Comments:</u></b> Examples become prescriptive when performance language is used, such as 80% LEL or six months. Suggest removing specific values from the examples in this column.</p> <p>(6) <b><u>Grade 2-(Example B)</u></b>  <del>Leaks requiring action within six months:</del>  <b><u>Comments:</u></b> The example indicates a shorter response time (6 months) than the proposed code requirement in column 1 (1 year).</p> <p>7) <b><u>Grade 3-(Priority of Leak Repair)</u></b>  <b><u>Comments:</u></b> Placing this table in table format will keep the margins aligned correctly.</p>	<p>(4) Staff disagrees. This language is current rule language. No proposed change to the language. Staff believes this current language is correct.</p> <p>(5) Staff disagrees. This language is current rule language. No proposed change to the language. Staff believes this current language is correct.</p> <p>(6) Leaks must be re-evaluated within a 6 month time frame. The 1 year time frame (15 months maximum) is for repair of leaks.</p> <p>(7) Staff will review.</p>

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10) WAC 480-93-187 Leak Records and Self Audit.	Puget Sound Energy	<p>(8) <b><u>Grade 3-(Examples)</u></b>  <b><u>Comments:</u></b> Examples become prescriptive when performance language is used, such as 80% LEL or six months. Suggest removing specific values from the examples in this column.</p> <p>(1) <b><u>Grade 1-(Definition)</u></b>  <del>A leak that represents an existing or probable hazard to persons or property and requires immediate repair or continuous action until the conditions are no longer hazardous.</del>  <b><u>Comments:</u></b> Definitions are given above. Duplicating here adds no value.</p> <p>(2) <b><u>Grade 1-(Examples 1 through 7).</u></b>  <b><u>Comments:</u></b> PSE prefers the current language of “would likely” since ANY leak “could potentially” migrate.</p>	<p>(8) Staff disagrees. This language is current rule language. No proposed change to the language. Staff believes this current language is correct.</p> <p>(1) Staff will review.</p> <p>(2) Staff disagrees. Staff believes the language is appropriate and leaks should be graded on the potential migration of gas.</p>
	Puget Sound Energy	<p>(2s) <del>Unique identification numbers (such as serial numbers) of leak detection equipment.</del>  <b><u>Comments:</u></b> (s) is not necessary given the calibration requirements set forth in Rule 480-93-188(2).</p>	<p>(2s) Staff disagrees. The intent is to associate particular instruments with individual leak surveys and to ensure all instruments have been calibrated as required.</p>

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<p>11) WAC 480-93-188 Gas Leak Surveys.</p>	<p>NW Natural, Avista Utilities &amp; Cascade Natural Gas</p> <p>Steven E. Oxford, Vice President, Operations Industrial Gas Services, Inc.</p>	<p>Paragraphs (4)(b) and (c) should be moved to 480-93-186. CNG requests that Staff define “building of public assembly” and which of them are required to be surveyed.</p> <p><i>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 49 CFR 192 to have a gas leak survey performed with a gas detection instrument. If you intend to require transmission lines to be surveyed with 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.</i></p>	<p>Staff disagrees. Staff believes the language is appropriate as written regarding (4)(b) and (c) since these paragraphs deal with conducting leak surveys and 480-93-186 deals with leak classification only. Building of public assembly will be defined in the definition section.</p> <p>Staff agrees.</p>