

**COMMENTS ON DOCKET TO-000712
HAZARDOUS LIQUIDS PIPELINE SAFETY RULEMAKING
CHAPTER 480-75 WAC**

7 December 2001

I wish to make a comment on section **480-75-007** of the above proposed pipeline safety rule. Section **480-75-007** deals with leak detection for small and catastrophic leaks in hazardous liquid pipelines. I agree completely with the idea of requiring leak detection. However, I feel that the proposed rule should also specify the desired level of leak rate sensitivity (probably expressed as gallon/hour). I am not personally qualified to make a suggestion as to the desired level of leak rate sensitivity, and indeed such a sensitivity level may vary from one situation to another.

Although I am a member of the Citizens Committee on Pipeline Safety, I am making this comment as a private citizen (and retired mechanical engineer).

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