

**Washington Utilities and Transportation Commission  
Pipeline Safety Division**

**Basin Frozen Foods, Inc. Six Inch Natural Gas Pipeline  
Docket Numbers UG-020230 & UG-020232  
VIOLATION REPORT**

The following report summarizes the violations of Title 49, Code of Federal Regulations (CFR) Parts 191, 192 and 199 and WAC 480-93 that were noted as a result of the 2002 standard natural gas pipeline inspection (UG-020230) and the drug and alcohol inspection (UG-020232) of the Basin Frozen Foods, Inc. six inch natural gas pipeline in Warden, Washington. The inspection was conducted on April 15,16, and 17, 2002, which included a review of operations, maintenance, procedures, records, and pipeline facilities. All violations were noted at the time of the inspection.

**1. CFR 191.17 (a) Transmission and Gathering Systems: Annual Report**

Except as provided in paragraph (b) of this section, each operator of a transmission or a gathering pipeline system shall submit an annual report for that system on Department of Transportation Form F RSPA 7100.2-1. This report must be submitted each year, not later than March 15, for the preceding calendar year.

**VIOLATION**

**1A.**

The Commission did not receive an annual report from Basin, nor did Basin submit an annual report for 2001 to the RSPA (Research & Special programs Administration).

**2. CFR 192.13 General**

Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.

**VIOLATIONS**

**2A.**

Basin's operation and maintenance (O&M) manual, section CP 870 As Built Requirements states, "This CP is to provide the Maps and Records Department with a record, which reflects a true picture of a completed facility." CP 870.011 states "This procedure shall apply to the following: construction programs, replacement programs, odorizers, regulators, regulator stations, construction of large main extensions which are beyond the scope of the Distribution Line Report and M & R Sets." CP 870.015 states, "When fittings are added or deleted the drawing will be changed as well as any material list. Change in material list only is not acceptable." Basin did not provide an as built copy of the drawing or material list of Basin's pipeline system as required in Basin's O&M manual. Basin did not follow the plans Basin established under CFR Part 192.13.

**2B.**

Basin's O&M manual, section CP 690.042.b Monthly Odorization Report (form 314) states, "Report shall be completed monthly for each of the Company's odorizers." Basin did not provide documentation of completed monthly odorant tests. Basin did not follow the plans Basin established under CFR Part 192.13.

**2C.**

Basin's O&M manual, section CP 740.071 Valve Maintenance and Inspection Records states, "All operational valves are to be shown and numbered V-1, V-2, etc. on the Operating Maps, High Pressure Line Sheets and Company area maps". Basin did not provide an operational map with numbered valves. Basin did not follow the plan Basin established under CFR Part 192.13.

**3. CFR 192.53 General**

Materials for pipe and components must be:

- (a) Able to maintain the structural integrity of the pipeline under temperature and other environmental conditions that may be anticipated;
- (b) Chemically compatible with any gas that they transport and with any other material in the pipeline with which they are in contact; and,
- (c) Qualified in accordance with the applicable requirements of this subpart.

**VIOLATION**

**3A.**

Basin did not provide documentation that the material specification for the pipe and components in Basin's transmission pipeline were qualified in accordance with CFR 192.53.

**4. CFR 192.150 Passage of Internal Inspection Devices**

- (a) Except as provided in paragraphs (b) and (c) of this section, each new transmission line and each line section of a transmission line where the line pipe, valve, fitting, or other line component is replaced must be designed and constructed to accommodate the passage of instrumented internal inspection devices.

**VIOLATION**

**4A.**

Basin did not provide documentation that the natural gas transmission pipeline was designed and constructed to accommodate the passage of instrumented internal inspection devices in accordance with CFR Part 192.150.

**5. CFR 192.179 (c) Transmission Line Valves**

Each section of a transmission line, other than offshore segments, between main line valves must have a blow down valve with enough capacity to allow the transmission line to be blown down as rapidly as practicable in accordance with CFR Part 192.179 (c).

## **VIOLATION**

### **5A.**

Basin did not provide documentation that Basin had a designated blow down system with enough capacity to allow the transmission line to relieve the pressure as rapidly as possible in an emergency or when performing operations and maintenance tasks on the pipeline system in accordance with CFR Part 192.179 (c).

## **6. CFR 192.225 Welding - General**

- (a) Welding must be performed by a qualified welder in accordance with welding procedures qualified to produce welds meeting the requirements of this subpart. The quality of the test welds used to qualify the procedures shall be determined by destructive testing.
- (b) Each welding procedure must be recorded in detail, including the results of the qualifying tests. This record must be retained and followed whenever the procedure is used.

## **VIOLATION**

### **6A.**

#### **Repeat violation of the 2001 Commission compliance Order (UG-010499)**

Basin's O&M manual, section CP 760 Welding Standards, includes welding procedures for pipe from 2-3/4 inches to 12-3/4 inch. Basin did not provide documentation of the destructive test results qualifying the welding procedures in accordance with CFR Part 192.225.

## **7. CFR 192.227 Qualification of Welders**

Except as provided in paragraph (b) of this section, each welder must be qualified in accordance with section 3 of API Standard 1104 or section IX of the ASME Boiler and Pressure Vessel Code. However, a welder qualified under an earlier edition than listed in Appendix A may weld but may not requalify under that earlier edition. American Petroleum Institute (API) Standard 1104 "Welding of Pipelines and Related Facilities" (18th edition, 1994) is incorporated by reference in Section II of Appendix A in CFR 49 Part 192.

## **VIOLATION**

### **7A.**

#### **Repeat Violation of the 2001 Commission compliance Order (UG-010499)**

Basin's O&M manual, section CP 760 Welding Standards, adopts and references API Standard 1104 "Welding of Pipelines and Related Facilities" (17<sup>th</sup> Edition, 1988). Basin did not use a qualified welder to qualify its welding procedures as required under CFR Part 192.227.

## **8. CFR 192.303 Compliance with Specifications or Standards**

Each transmission line or main must be constructed in accordance with comprehensive written specifications or standards that are consistent with this part.

**VIOLATION**

**8A.**

Basin did not produce documentation that the pipeline was constructed in accordance with a comprehensive written specifications.

**9. CFR 192.475 Internal Corrosion Control**

Corrosive gas may not be transported by pipeline, unless the corrosive effect of the gas on the pipeline has been investigated and steps have been taken to minimize internal corrosion.

**VIOLATION**

**9A.**

Basin did not provide documentation of the natural gas composition that Basin is transporting. Basin did not prove it was not transporting corrosive gas in accordance with CFR 192.475.

**10. CFR 192.605 Procedural Manuals for Operations, Maintenance, and Emergencies**

Procedural manual for operations, maintenance, and emergencies. Each operator shall include the following in its operating and maintenance plan:

- (a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.
- (b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.
  - (1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and Subpart M of this part.
  - (2) Controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of this part.
  - (3) Making construction records, maps, and operating history available to appropriate operating personnel.
  - (4) Gathering of data needed for reporting incidents under Part 191 of this chapter in a timely and effective manner.
  - (5) Starting up and shutting down any part of the pipeline in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices.
  - (6) Maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service.

- (7) Starting, operating and shutting down gas compressor units.
  - (8) Periodically reviewing the work done by operator personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedure when deficiencies are found
  - (9) Taking adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapor or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and, a rescue harness and line.
  - (10) Systematic and routine testing and inspection of pipe-type or bottle-type holders including -
    - (i) Provision for detecting external corrosion before the strength of the container has been impaired;
    - (ii) Periodic sampling and testing of gas in storage to determine the dew point of vapors contained in the stored gas which, if condensed, might cause internal corrosion or interfere with the safe operation of the storage plant; and,
    - (iii) Periodic inspection and testing of pressure limiting equipment to determine that it is in safe operating condition and has adequate capacity.
- (c) Abnormal operation. For transmission lines, the manual required by paragraph (a) of this section must include procedures for the following to provide safety when operating design limits have been exceeded:
- (1) Responding to, investigating, and correcting the cause of:
    - (i) Unintended closure of valves or shutdowns;
    - (ii) Increase or decrease in pressure or flow rate outside normal operating limits;
    - (iii) Loss of communications;
    - (iv) Operation of any safety device; and,
    - (v) Any other foreseeable malfunction of a component, deviation from normal operation, or personnel error, which may result in a hazard to persons or property.
  - (2) Checking variations from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation.
  - (3) Notifying responsible operator personnel when notice of an abnormal operation is received.
  - (4) Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.
  - (5) The requirements of this paragraph (c) do not apply to natural gas distribution operators that are operating transmission lines in connections with their distribution system.

- (d) Safety-related condition reports. The manual required by paragraph (a) of this section must include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting requirements of §191.23 of this subchapter.
- (e) Surveillance, emergency response, and accident investigation. The procedures required by §§192.613(a), 192.615, and 192.617 must be included in the manual required by paragraph (a) of this section

## **VIOLATIONS**

### **10A.**

Basin's contractor did not have Basin's procedures to perform pressure tests on a regulator inside William's Gate Station.

### **10B.**

Basin does not have written procedures for making transmission line repairs to Basin's pipeline, as required by CFR Part 192.605 (a). Basin's O&M manual, section CP 766 Transmission Line Repairs states, "This procedure applies to the following CNG lines identified by district in section CP 640." Section CP 766 identifies 3 Cascade Natural Gas transmission lines. There is not a section CP 640 in Basin's O&M manual. There is not a section pertaining to transmission line repairs on Basin's transmission pipeline.

### **10C.**

#### **Repeat Violation of the 2001 Commission Compliance Order (UG-010499)**

Basin's O&M manual, section CP 600 Start Up/Shut Down Procedure referred to starting up and shutting down the pipeline. The manual did not have detailed written procedures for starting up and shutting down the pipeline in accordance with CFR Part 192.605(b)(5).

### **10D.**

#### **Repeat Violation of the 2001 Commission Compliance Order (UG-010499)**

Basin O&M manual, section CP 730, Abnormal Operations, did not include written procedures for responding to, investigating, and correcting the cause of unintended closure of valves or shutdowns, increase or decrease in pressure or flow rate outside normal operating limits, loss of communications, operation of any safety device, and any other foreseeable malfunction of a component, deviation from normal operation, or personnel error which may result in a hazard to persons or property.

### **10E.**

Basin O&M manual, section CP 730 Abnormal Operations, did not include written procedures for checking variations from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation in accordance with CFR Part 192.605 (c)(2).

**10F.**

Basin's O&M manual, section CP 730 Abnormal Operations, did not include written procedures for notifying responsible operator personnel when notice of an abnormal operation is received in accordance with CFR Part 192.605 (c)(3).

**10G.**

Basin's O&M manual, section CP 730 Abnormal Operations, did not include written procedures for periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found in accordance with CFR Part 192. (c)(4).

**10H.**

Basin's O&M manual, section CP 925 Emergency Policy, did include written procedures for making telephonic notice to the Commission nor did it include written procedures for telephonically notifying the National Response Center of incidents in accordance with CFR Part 191.1.

**10I.**

Basin's O&M manual did not include written procedures for making construction records, maps, and operating history available to appropriate operating personnel in accordance with CFR Part 192.605 (b)(3).

**10J.**

Basin's O&M manual, section CP 925 Emergency Policy, did not include adequate written procedures for emergency response. Basin's emergency plan did not include written procedures for Basin and its contractor to communicate and manage an emergency. Basin's emergency plan did not include written procedures for an alternate plan if Basin's contractor cannot be available or available in a reasonable amount of time. The manual did not include adequate emergency response procedures in accordance with CFR Part 192.605 (a).

**10K.**

Basin's O&M manual did not include procedures for public education in accordance with CFR Part 192.605 (a).

**10L.**

Basin did not have written procedures to maintain transmission line records in accordance with CFR Part 192.605.

**10M.**

CFR Part 192.605, (d) safety-related condition reports, requires the O&M manual to "include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting requirements of CFR Part 191.23." Basin's O&M manual did not have written procedures for safety-related conditions in accordance with CFR Part 192.605 (a).

**11. CFR 192.613 Continuing Surveillance**

Each operator shall have a procedure for continuing surveillance of its facilities to determine and take appropriate action concerning changes in class location, failures, leakage history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions.

**VIOLATION**

**11A.**

**Repeat Violation of the 2001 Commission Compliance Order (UG-010499)**

Basin did not have a procedure for continuing surveillance of its facilities to determine class location, failures, leakage history, cathodic protection requirements or other usual operating maintenance conditions in accordance with CFR Part 192.613. The procedure would require Basin to combine all inspections and testing information that had been done on the pipeline and review it to see if any unusual operating or maintenance conditions existed.

**12. CFR 192.614 Damage Prevention Program**

The damage prevention program required by paragraph (a) of this section must, at a minimum:

- (1) Include the identity, on a current basis, of persons who normally engage in excavation activities in the area in which the pipeline is located.
- (2) Provides for notification of the public in the vicinity of the pipeline and actual notification of the persons identified in paragraph (c)(1) of this section of the following as often as needed to make them aware of the damage prevention program.
- (3) Provide a means of receiving and recording notification of planned excavation activities.
- (4) If the operator has buried pipelines in the area of excavation activity, provide for actual notification of persons who give notice of their intent to excavate of the type of temporary marking to be provided and how to identify the markings.
- (5) Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.
- (6) Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:
  - (i) The inspection must be done as frequently as necessary during and after the activities to verify the integrity of the pipeline; and
  - (ii) in the case of blasting, any inspection must include leakage surveys.

**VIOLATIONS**

**12A.**

Basin did not provide documentation that Basin's program had a means of receiving and recording notifications of planned excavations in accordance with CFR Part 192.614 (3). Commission staff investigated and was informed by the local one-call notification center that Basin had received 25 locate requests in 2001.



**12B.**

For the 25 located requests made in 2001, Basin did not provide documentation that Basin had either located their buried pipeline or notified the excavator that Basin did not have buried pipeline in the area of excavation.

**12C.**

Basin did not provide documentation that Basin's program had identified the persons who normally engage in excavation activities in the area in which Basin's pipeline is located in accordance with CFR Part 192.614 (c)(1).

**12D.**

Basin did not provide documentation that Basin's program had notified the public in the vicinity of the pipeline and actual notification of the persons who normally engage in excavation activities in the area in accordance with CFR Part 192.614 (2).

**13. CFR 192.615 Emergency Plans**

Each operator shall establish written procedures to minimize the hazards resulting from a gas pipeline emergency.

**VIOLATIONS**

**13A.**

Basin did not provide documentation that Basin had established and maintained an adequate means of communication with appropriate fire, police, and other public officials in accordance with CFR Part 192.615 (a)(2).

**13B.**

Basin's O&M manual, section CP 925 Emergency Policy (a) states, "Notify Cascade Natural Gas of emergency and request response team." Basin does not have a procedure to ensure that personnel, equipment, tools, and materials are provided as needed at the scene of an emergency in accordance with CFR Part 192.615 (a) (4).

**13C.**

Basin's employee did not have a key to access William's and Basin's Regulator Station (the station is known as the Warden Meter Station on Basin's cathodic map). If Basin's contractor could not immediately respond to an emergency, Basin would not have access to its own facility inside the William's and Basin Regulator Station in accordance with CFR Part 192.615 (a)(4).

**13D.**

Basin's emergency plan did not have written procedures identifying Basin's emergency valves necessary to minimize the hazard resulting from a gas pipeline emergency. Emergency valves are required in emergency situations for shutdown and pressure reduction in any section of the operator's pipeline system necessary to minimize hazards to life or property in accordance with CFR Part 192.615 (a)(6).

**13E.**

Basin did not provide procedures to notify appropriate fire, police, and other public officials of gas pipeline emergencies and coordinating with them both planned and actual responses during an emergency in accordance with CFR Part 192.615 (a) (8).

**13F.**

Basin had not furnished its contractor supervisors, who are responsible for emergency action, a copy of that portion of the latest edition of the emergency procedures established under paragraph (a) of CFR Part 192.615.

**13G.**

**Repeat Violation of the 2001 Commission Compliance Order (UG-010499)**

Basin did not provide documentation that Basin's natural gas employee or Basin's representatives had been trained to assure that they were knowledgeable of the emergency procedures and to verify that the contractor's training is effective in accordance with CFR Part 192.615 (b)(2).

**13H.**

**Repeat Violation of the 2001 Commission Compliance Order (UG-010499)**

Basin did not provide documentation that Basin had established and maintained a liaison with appropriate fire, police, and other public officials in accordance with CFR Part 192.615 (c) (1).

**13I.**

Basin did not provide documentation that Basin had acquainted local emergency response officials with Basin's ability to respond to a gas pipeline emergency in accordance with CFR Part 192.615 (c)(2).

**13J.**

Basin did not provide documentation that Basin had identified the types of gas pipeline emergencies of which the operator notifies local emergency response officials in accordance with CFR Part 192.615 (c)(3).

**13K.**

Basin did not provide a plan describing how the operator and officials will engage in mutual assistance to minimize hazards to life or property in accordance with CFR Part 192.615 (c)(4).

**14. CFR 192.616 Public Education**

Each operator shall establish a continuing educational program to enable customers, the public, appropriate government organizations, and persons engaged in excavation related activities to recognize a gas pipeline emergency for the purpose of reporting it to the operator or the appropriate public officials. The program and the media used must be as comprehensive as necessary to reach all areas in which the operator transports gas. The program must be conducted in English and in other languages commonly understood by a

significant number and concentration of the non-English speaking population in the operator's area.

**VIOLATION**

**14A.**

Basin did not provide documentation that Basin provided public education information to the public, appropriate government organizations or persons engaged in excavation in the area in which they transports gas in accordance with CFR Part 192.616.

**15. CFR 192.617 Investigation of Failures**

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 a recurrence.

**VIOLATION**

**15A.**

Basin did not have a procedure for analyzing accidents and failures in accordance with CFR Part 192.617.

**16. CFR 192.619 (a) Maximum Allowable Operating Pressure: Steel or Plastic Pipelines**

- (a) Except as provided in paragraph (c) of this section, no person may operate a segment of steel or plastic pipeline at a pressure that exceeds the lowest of the following:
  - (i) The design pressure of the weakest element in the segment, determined in accordance with subparts C and D of this part.

**VIOLATION**

**16A.**

**Repeat Violation of the 2001 Commission Compliance Order (UG-010499)**

Basin did not provide documentation of an established maximum allowable operating pressure (MAOP). Basin did not identify the weakest element in the pipeline and did not provide the material specifications of the actual materials used in the construction of the natural gas pipeline system in order to determine the MAOP.

**17. CFR 192.705 (b) Transmission Lines: Patrolling**

- (a) Each operator shall have a patrol program to observe surface conditions on and adjacent to the transmission line right-of-way for indications of leaks, construction activity, and other factors affecting safety and operation.
- (b) The frequency of patrols is determined by the size of the line, the operating pressures, the class location, terrain, weather, and other relevant factors, but intervals between patrols may not be longer than prescribed in the following table:  
...In class 4 locations 4 ½ months, but at least four times each calendar year.

**VIOLATION**

**17A.**

**Repeat Violation of the 2001 Commission Compliance Order (UG-010499)**

Basin did not provide documentation that the pipeline had been patrolled in accordance with CFR Part 192.705.

**18. CFR 192.739 (c) Pressure Limiting and Regulating Stations: Inspection and Testing**

Each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is:

- (a) In good mechanical condition;
- (b) Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed;
- (c) Set to function at the correct pressure; and,
- (d) Properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.

**VIOLATION**

**18A.**

**Repeat Violation from 2001 Follow up Inspection (UG-011593)**

Basin's contractors Facility Maintenance and Inspection Record Cascade Natural Gas (CNG) form, dated 4-15-2002, indicated that the regulator was set at 145 pounds per square inch gauge (psig) and set to lock up the pressure at 150 psig. A 600-pound pressure gauge was used to conduct a test on the regulator lock up pressure. The gauge showed the pressure climbed to 170 psig. The regulator failed the lock up test. Staff was provided a copy of Basin's contractor Operation and Maintenance Request form showing that maintenance had been done on the regulator. The CNG form stated, "rebuilt pilot, cleaned valve and reversed position of diaphragm. Took test." On 4-17-2002 (after the repair), Staff witnessed a pressure lock up test on Basin's regulator. A 600-pound gauge was used for the second test. The regulator did not lock up at the set pressure; it continued to climb to 170 psig. At that point, the lock up test had failed and the test was terminated.

**19. Title 49 CFR Part199/Part 40 Drug and Alcohol**

This part requires operators of pipeline facilities subject to part 192, 193, or 195 of this chapter to test covered employees for the presence of prohibited drugs and alcohol in accordance with all of CFR Part 199/Part 40.

**VIOLATION**

**19A.**

Basin did not provide an anti-drug program or an alcohol misuse prevention program in accordance with CFR Part 199.

**20. WAC 480-93-018 Maps, Drawings, and Records of Gas Facilities**

All gas companies shall prepare, maintain, and provide to the Commission, upon request, copies of maps, drawings, and records of the company's gas facilities. The maps, drawings, and records shall be of such scale and detail as is necessary to show the size and type of material of all facilities, whether or not the facilities are cathodically protected, and the maximum operating pressure. The maps and drawings shall indicate all district regulator stations and gate stations and the approximate location of all valves, identifying those valves classified as emergency valves in the company's emergency procedures. The gas company shall provide key sheets for ready reference as needed.

**VIOLATION**

**20A.**

Staff was provided a copy of Basin's cathodic protection map. The map did not show the size and type of material of all facilities, the maximum operating pressure, the emergency valves, the regulator station at U Road, the regulator station at Basin Road or the cathodic protection test stations in accordance with WAC 480-93-018.

**21. WAC 480-93-082 Qualification of Employees**

Every gas company that operates a gas facility in this state shall have one or more employees working in this state that are collectively knowledgeable and qualified in all aspects of gas company construction, operation, maintenance, and state and federal gas safety rules and regulations. Every gas company shall prepare, maintain, and provide to the Commission, upon request, evidence of the qualifications of employees to perform all duties assigned in the operation, maintenance, inspection, and construction of gas facilities. This evidence of an employee's qualifications shall specify the type of all training received, when and where such training was received, and the length of time the employee has performed the specific duties assigned. On the job training, under the supervision of personnel qualified by training and experience, in a company-certified, company-sponsored training program, may satisfy the requirements of this section.

**VIOLATION**

**21A.**

Basin did not provide documentation that Basin had an employee that was knowledgeable and qualified in all aspects of gas company construction, operation, maintenance, and state and federal gas safety rules and regulations.

**22. WAC 480-93-120 Exposed Pipelines**

Proper warning signs shall be placed and other adequate protective measures taken at any point where gas pipelines and any associated equipment and facilities are exposed, and where their location presents an unusually hazardous situation. All gas pipelines attached to bridges or otherwise spanning an area shall have proper warning signs at both ends of the suspended pipeline. The gas company shall keep these signs visible and readable, and inspect all signs annually; signs, which are reported, damaged and missing shall be replaced promptly.

## **VIOLATIONS**

### **22A.**

#### **Repeat Violation of the 2001 Commission Compliance Order (UG-010499)**

Staff discovered that one bridge crossing warning sign was missing on the bridge on 7th Road.

### **22B.**

Basin did not have a warning sign posted at the Williams and Basin regulator station where the natural gas pipe is exposed.

#### **23. WAC 480-93-124 Pipeline Markers**

All buried gas pipelines shall have pipeline markers placed and maintained as close as practical over each main and transmission line as required by 49 CFR, Part 192.707. Offset pipeline markers may be used only if they indicate the distance from and direction to the pipeline. The pipeline markers shall be double-faced or single-faced signs. Single-faced signs may be used on posts of distinctive color and shall meet the requirements of 49 CFR, Part 192.707(d). Pipeline markers shall be placed at all railroad crossings, road crossings, irrigation and drainage ditch crossings, and at all fence lines where a pipeline crosses private property. Pipeline markers required by 49 CFR, Part 192.707(a), shall be placed approximately five hundred yards apart if practical and at points of deflection of the pipeline. Exceptions to this rule must conform to Title 49, CFR Part 192.707(b).

## **VIOLATION**

### **23A.**

Basin provided a map with the line marker placements. Staff's field investigation discovered line markers on U Road were missing.

#### **24. WAC 480-93-180 Plan of Operations and Maintenance Procedures, Emergency Policy, Reporting Requirements**

In compliance with the provisions and general intent of the federal "Natural Gas Pipeline Safety Act," 49 CFR, Part 192, every gas company shall develop appropriate operating, maintenance, safety, and inspection plans and procedures and an emergency policy. Such plans and procedures, and all subsequent changes and amendments, initiated by the gas company or pursuant to changes in state and federal rules and regulations, shall be promptly filed with the Commission, for review and determination as to their adequacy, when properly executed, to achieve an acceptable level of safety. The Commission may, after notice and opportunity for hearing, require such plans and procedures to be revised. The plans and procedures required by the Commission shall be practicable and designed to meet the needs of safety. In determining the adequacy of such plans and procedures to achieve an acceptable level of safety, the Commission shall consider:

- (1) relevant available pipeline safety data;
- (2) whether the plans and procedures are appropriate for the particular type of pipeline operations being performed by the gas company, taking into consideration company size, geographical area of operation, and the public interest.

**VIOLATION**

**24A.**

Basin's O&M manual was modeled after a natural gas distribution system's O&M manual. Basin's natural gas transmission pipeline O&M manual does not accurately reflect Basin's operations, maintenance, and emergency response. Parts of the manual are procedures designated only for distribution mains and services, gas customers and extra procedures that do not apply to Basin's current or future transmission pipeline operations. Many of Basin's plans and procedures are not appropriate for the particular type of pipeline operations being performed by Basin.

Basin is a transmission natural gas pipeline, not a distribution natural gas pipeline. The unnecessary distribution pipeline information makes finding the correct transmission pipeline information difficult and confusing. In both normal operating and emergency conditions the inappropriate and confusing O&M manual creates an unsafe condition for Basin's personnel and contractors. The plans and procedures required by the Commission require the O&M manual to be practicable and designed to meet the needs of safety. Basin is not operating in accordance with WAC 480-93-180.

**25. WAC 480-93-184 Gas Leak Responsibility**

Each gas company shall designate personnel who shall be responsible for pipeline and service line patrolling; leak survey practices, procedures, and operations; and leak classification and repairs within its respective areas of operation (i.e. division, district, etc.).

**VIOLATION**

**25A.**

Basin did not have a designated employee or contract employee to be responsible for pipeline patrolling, leak survey practices, procedures and operations in accordance with WAC 480-93-184.

**26. WAC 480-93-200 Reports Associated with Gas Company Facilities and Operations**

All gas companies shall file with the Commission, and with appropriate officials of all municipalities within which such gas companies have facilities, the names, addresses, and telephone numbers of responsible officials of such gas companies who may be contacted in the event of an emergency. In the event of any changes in gas company personnel, immediate notification thereof shall be given to the Commission and municipalities.

**VIOLATION**

**26A.**

Basin did not provide documentation that Basin had filed the names, addresses and telephone numbers of responsible Basin officials with the Grant County and Warden police, fire, and emergency response centers within which the gas company has facilities in accordance with WAC 480-93-200.