



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- 101617

CERTIFIED MAIL

December 15, 2010

James Reed, President
Bow Lake, Inc.
18050 32nd Ave S.
Seattle, WA 98188

Dear Mr. Reed:

RE: 2010 Master Meter System Standard Inspection – Bow Lake, Inc.

On November 15, 2010 the Washington Utilities and Transportation Commission's (commission) pipeline safety staff conducted a Natural Gas Master Meter (MM) Standard inspection of the the Bow Lake, Inc. facility located at 18050 32nd Ave S., Seattle, WA.

Prior to 2010, the commission conducted courtesy inspections of the Bow Lake, Inc. system. Bow Lake, Inc. 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.

Bow Lake, Inc. 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 Bow Lake, Inc. agrees to comply with all applicable federal (49 CFR 192) and state WAC rules (480-93) and to remedy the out of compliance items identified in the attached report; and
2. A plan including timeframes to complete all non-compliance items.

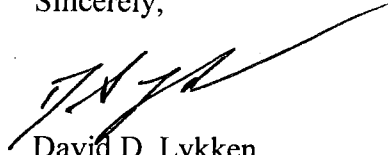
The UTC will conduct a follow up inspection(s) for those items.



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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-101617 in any future correspondence regarding this inspection.

Sincerely,

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

David D. Lykken
Pipeline Safety Director

Enclosure

cc. Robert Mayfield

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2010 Natural Gas Master Meter Pipeline Safety Inspection
Bow Lake, Inc., Seattle, WA
Docket PG-101617

Master Meter regulations are found in Title 49, CFR Part 191, 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 Bow Lake, Inc 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. Continue to 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 certificating all employees and contractors in accordance with WAC 480-93-013. Bow Lake, Inc. is currently 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 tasks performed by contractors.

10. Provide and maintain a copy of PSE's Regulator Station annual inspection, performed on the master meter in accordance with CFR 192.739. Bow Lake, Inc. is out of compliance and must provide copies of PSE's annual Regulator Station 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. Bow Lake, Inc. is out of compliance and must provide a written Public Awareness' Plan and procedure in O&M manual.
13. Maintain a copy of Drug and Alcohol testing for all contractor employees who work on Bow Lake, Inc. facilities in accordance with CFR 199.2.
14. Commit to annually review, update and document the O&M Manual in accordance with CFR 192.605(a).
15. Continue to maintain Bow Lake, Inc.'s Emergency Plan. Bow Lake, Inc is out of compliance and must include natural gas emergency response steps in the O&M Emergency Plan CFR 192.615.
16. Continue to maintain Bow Lake, Inc.'s failure analysis procedure in accordance CFR 192.617.
17. Continue to 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). Bow Lake, Inc. is out of compliance and must:
 - a. document completion of all operations and maintenance requirements in accordance CFR 191, 192, 199 and WAC 480-93-018;
 - b. continue to maintain the mapping system;
 - c. have dates that construction activities were completed and mapped;
 - d. make records available to appropriate operations personnel in accordance with WAC 480-93-018(3).
19. Maintain the MAOP of the system in accordance with CFR 192.619 (3).
20. Provide written verification from PSE that the natural gas has the proper concentration of odorant in accordance with CFR 192.625 (f). Bow Lake, Inc is out of compliance and must provide written verification from PSE that the odorant test site closest to the facility has proper odorant.
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. Continue to inspect and test each valve necessary for the safe operation of the Bow Lake, Inc. distribution system, at intervals not exceeding 15 months, but at least once each calendar year and take prompt remedial action to correct any valve found inoperable, unless Bow Lake, Inc designates an alternative valve in accordance with CFR 192.747.
24. Conduct annual cathodic protection surveys in accordance with CFR 192.465 if required. Currently, Bow Lake Inc has removed all cathodic protection because they converted the natural gas system to all plastic pipe, however if steel pipe is placed back into the system cathodic protection must be installed.
24. Carry out corrosion control responsibility with a qualified person: design, installation, operation, and maintenance in accordance with CFR 192.453 if steel is installed.
25. 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), if steel is installed.
26. Calibrate and test for accuracy all cathodic protection equipment and instrumentation in accordance with WAC 480-93-110(3), if steel is installed.
27. 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.
28. Continue to conduct patrols in accordance with CFR 192.721.