

CERTIFIED MAIL

September 5, 2003

Kevin Davis
Paper Machine Superintendent
Inland Empire Paper Company
3320 N. Argonne
Spokane, Washington 99212

Dear Mr. Davis:

Subject: 2003 Inland Empire Paper Company Standard Inspection

The Washington Utilities and Transportation Commission (Commission) has the authority to enforce the minimum safety regulations per Chapter 480-93 of the Washington Administrative Code (WAC) pertaining to the construction, maintenance and operation of pipelines transporting natural gas in the state of Washington. In addition, the Commission adopts the Code of Federal Regulations (CFR) Title 49 Part 191 and 192.

On May 20 and 21, 2003, the Commission staff (Staff) conducted an on-site safety inspection of the Inland Empire Paper Company (IEPC) 4-inch natural gas pipeline facilities in Spokane. Enclosed with this letter is Staff's report that summarizes the results of the inspection. The report lists one violation to the safety regulations. Areas of concern that were noted include:

- a) The existing maps for IEPC facilities needs to be updated to include the pipeline relocation on Fruit Hill Road adjacent to Mr. Beach's property and the relocation of the pipeline at the meter station pursuant to WAC 480-93-018,
- b) Additional pipeline markers are recommended at the relocated pipeline road crosses on Fruit Hill Road. The pipeline was redesigned to cross the road at two locations adjacent to Mr. Beach's property where the road makes a 90-degree turn pursuant to WAC480-93-124,
- c) The operator's operation and maintenance manual sections 6.06.4.9 – "Removal of (weld) defects," and 6.06.4.10 – "Authorization for (weld) repairs" has references that are not included in the current O&M manual. It is recommended that these sections be updated in the next revision pursuant to 192.605, and

Inland Empire Paper Company

- d) During the inspection, pipe supports were in direct contact with the pipeline. Some of the pipe support corrosion problems have been mitigated with a dielectric material. The dielectric material is used to separate the pipe from the supports to prevent atmosphere corrosion. It is recommended that IEPC complete the installation of the dielectric material. Where atmospheric corrosion exist, the pipe and supports should be cleaned and coated with material suitable for the prevention of atmospheric corrosion pursuant to 192.461(b).

It should not be assumed that this inspection detected all apparent violations of the regulations at this time. It is incumbent upon the operator to review its operation to determine whether or not there are other areas of non-compliance. Staff would appreciate receiving your written response to the violation by October 11, 2003. The response should include a letter of intent indicating dates as to how and when full compliance will be obtained.

Staff would like to thank you and Mr. Allen for your cooperation and willingness to provide assistance in completing this inspection.

If you have any questions or need any assistance, please contact Al Jones, Pipeline Safety Engineer at (360) 664-1321.

Thank you for your cooperation and interest in pipeline safety.

Sincerely,

Alan Rathbun
Pipeline Safety Director

Enclosure

AJ/mw

Washington Utilities and Transportation Commission
2003 Natural Gas Pipeline Safety Inspection Report
Inland Empire Paper Company (IEP)
Docket No. PG-030525

The following non-compliance items of CFR Title 49 Part 191 and 192 was noted as a result of the inspection of the Inland Empire Paper Company's (IEPC) natural gas pipeline facilities. The inspection included a review of records, operation and maintenance manual, emergency response manual, and field inspection of the pipeline facilities.

VIOLATION

1. **§192.323 Casing**

Each casing used on a transmission line or main under a railroad or highway must comply with the following:

- (c) *If the ends of an unvented casing are sealed and the sealing is strong enough to retain the maximum allowable operating pressure of the pipe, the casing must be designed to hold this pressure at a stress level of not more than 72 percent of SMYS.*

Findings:

Inland Empire Paper Company has a pipeline casing across Upriver Drive. The operator does not have a design to meet the stress level of 72 percent of Specified Minimum Yield Strength.