



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

CERTIFIED MAIL

June 29, 2012

Kevin Rasler
General Manager
Inland Empire Paper Company
3320 N. Argonne
Spokane, WA 99212

Dear Mr. Rasler:

RE: 2012 Natural Gas Standard Inspection – Inland Empire Paper Company

Staff from the Washington Utilities and Transportation Commission (staff) conducted a standard inspection from May 29 – June 1, 2012 of Inland Empire Paper Company's (IEP) Spokane pipeline facilities. The inspection included a records review, plan and procedure review, and inspection of the pipeline facilities.

Our inspection indicates four probable violations as noted in the enclosed report.

Your response needed

Please review the attached report and respond in writing by August 1, 2012. The response should include how and when you plan to bring the probable violations into full compliance.

What happens after you respond to this letter?

The attached report presents staff's decision on probable violations and does not constitute a finding of violation by the commission at this time.

After you respond in writing to this letter, there are several possible actions the commission, in its discretion, may take with respect to this matter. For example, the commission may:

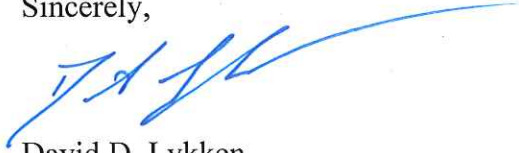
- Issue an administrative penalty under RCW 81.88.040, or
- Institute a complaint, seeking monetary penalties, changes in the company's practices, or other relief authorized by law, and justified by the circumstances, or
- Consider the matter resolved without further commission action.



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If you have any questions, or if we may be of any assistance, please contact Dave Cullom at (360) 664-1141. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,



David D. Lykken
Pipeline Safety Director

Enclosure

cc: Kevin Davis, Production Manager, Inland Empire Paper Company

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2012 Natural Gas Pipeline Safety Inspection
Inland Empire Paper Company – Spokane Mill

The following probable violations of WAC 480-93 and 49 U.S.C 60132 were noted as a result of the 2012 inspection of the Inland Empire Paper Company – Spokane Mill. The inspection included a random selection of records, operation and maintenance, emergency response, inventory and field inspection of the pipeline facilities.

PROBABLE VIOLATIONS

1. **49 U.S.C. § 60132 National pipeline mapping system.**

(b) *Updates.--A person providing information under subsection (a) shall provide to the Secretary updates of the information to reflect changes in the pipeline facility owned or operated by the person and as otherwise required by the Secretary.*

Finding(s):

The operator could not demonstrate that they had met this requirement by updating their submission. If operators have no change since their previous NPMS submission, they may continue to send an e-mail to npms-nr@mbakercorp.com or use the “Update your submission online” tool on the NPMS Web site (<http://www.npms.phmsa.dot.gov>) in lieu of making a submission.

2. **WAC 480-93-170 Tests and reports for pipelines.**

(10) *Pressure testing equipment must be maintained, tested for accuracy, or calibrated, in accordance with the manufacturer's recommendations. When there are no manufacturer's recommendations, then pressure testing equipment must be tested for accuracy at an appropriate schedule determined by the gas pipeline company. Test equipment must be tagged with the calibration or accuracy check expiration date. The requirements of this section also apply to equipment such as pressure charts, gauges, dead weights or other devices used to test, monitor or check system pressures or set-points.*

Finding(s):

The pressure gauges used to test the regulator flow set points and lockup have not been calibrated or accuracy checked. They also, at the time of inspection, were not tagged with the accuracy check or calibration expiration date.

3. **WAC 480-93-188 Gas leak surveys.**

(2) *Each gas pipeline company must maintain, test for accuracy, calibrate and operate gas detection instruments in accordance with the manufacturer's recommendations. If there are no written manufacturer's recommendations or schedules, then the gas pipeline company must test such instruments for accuracy at least monthly, but not to exceed forty-five days between testing, and at least twelve times per year. The gas pipeline company must recalibrate or remove from service any such instrument that does not meet applicable tolerances. Records of accuracy checks, calibration and other maintenance performed must be maintained for five years.*

Finding(s):

The instrument used to perform the gas leak surveys is accuracy checked using the built in self-test function per the manufacturer's recommendations, but no records of the test were retained.

4. **WAC 480-93-188 Gas leak surveys.**

(5) Each gas pipeline company must keep leak survey records for a minimum of five years. At a minimum, survey records must contain the following information:

(f) Instrument tracking or identification number.

Finding(s):

The instrument tracking or identification number used to perform the gas leak surveys was not recorded on the leak survey records.