



J.R. Simplot Company
Simplot Headquarters
1099 W. Front Street
Boise, Idaho 83702
P.O. Box 27
Boise, Idaho 83707

208 336 2110

October 3, 2018

SENT VIA CERTIFIED MAIL #7017 2400 0000 9261 8571
RETURN RECEIPT REQUESTED

Sean Mayo
Pipeline Safety Director
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
Olympia WA, 98504-7250

RECEIVED
OCT - 9 2018
WASH. UT. & TP. COMM

Re: 2017 Biogas Standard Inspection – J.R. Simplot Co, Moses Lake, WA – Inspection
Number 7242

Dear Mr. Mayo:

The J.R. Simplot Company (Simplot) has reviewed and understands that U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration (PHMSA) through its interpretation letter dated July 31, 2018 letter, has referred the odorization issue back to your office.

It is the desire of Simplot to comply with all the requirements of 49 CFR §192 that apply to the Moses Lake pipeline. However, due to the nature of the biogas being transported, performing a traditional odorant concentration test as required by Section 192.625 is not possible since doing so would jeopardize the health of the employee performing the test. The test requires an employee to inhale the biogas, which contains a poisonous gas, hydrogen sulfide. Exposure to concentrations of hydrogen sulfide at a concentration of 800-1000 parts per million (ppm) may be fatal in 30 minutes and high concentrations are instantly fatal.¹ The concentration of hydrogen sulphide in the Moses Lake biogas has been measured at 4,329 ppm. In addition, there is no option to perform the required test using an instrument since the applicable code is based on the use of a human nose to perform the test. Jeopardizing the health of an employee to perform the test is not an option for Simplot.

Simplot presents the following for the Commissions' consideration as a method to satisfy the requirement of Section 192.625:

1. The intent of Section 192.625 is to ensure that odorized natural gas is readily detectable by the human nose at a 1% concentration gas in air.

¹ Lewis.RJ. 2000. Sax's Dangerous Properties of Industrial Materials. p.1998-1999.

2. The biogas transported by the Moses Lake pipeline smells strongly of total reduced sulphur compounds, of which the primary compound is hydrogen sulphide. Hydrogen sulphide has been measured at a concentration of 4,329 parts per million (ppm_v); the human perception of hydrogen sulphide is 2 parts per billion.²
3. The ability to detect the presence of biogas has never been considered an issue by any Commission auditor in the history of the facility.

Considering the points presented above, Simplot proposes the following alternative method for determining odorant concentration of its Moses Lake pipeline:

1. Simplot commits to determining the concentration of hydrogen sulfide in the transported biogas once yearly and retain that analysis in the pipeline records for audit.
2. If the hydrogen sulfide concentration should ever diminish significantly, Simplot will provide a method of supplemental odorization.

Should you have any questions please, please contact Burl Ackerman at 208.780.7466.

Sincerely,



Alan L. Prouty
Vice President, Environmental & Regulatory Affairs

CC: Robert Cosentino, Cosentino Consulting
Kuang Chu, Cosentino Consulting
Burl Ackerman, J.R. Simplot Company

² Merck Index. 1976. 9th ed., p.633.