

**From:** Mansy, Pascal  
**To:** [Pipeline Program, UTC](#); [Norwood, Derek \(UTC\)](#)  
**Cc:** [Alicia Fuentes](#); [Robert May](#); [Mayo, Sean \(UTC\)](#); [Subsits, Joe \(UTC\)](#); [Becker, Deborah \(UTC\)](#)  
**Subject:** Operator ID 32399 - Response to the 2018 Hydrogen Gas Operations and Maintenance Manual Review - Solvay Chemicals, Inc. (Insp. No. 7577)  
**Date:** Friday, September 28, 2018 2:20:06 PM  
**Attachments:**

---

Derek,

Please find attached our Hydrogen Pipeline O&M Manual revised to address the findings associated to the 2018 Hydrogen Gas Operations and Maintenance Manual Review - Solvay Chemicals, Inc. (Insp. No. 7577).

The findings have been addressed as follows:

- Finding 1:

Requirement of 49 CFR 192.487 added to O&M manual page 20

- Finding 2:

Requirement of WAC 480-93-110 (5) added to O&M manual page 17

The frequency is listed in Attachment A of the O&M manual under "Cathodic Protection Inspection and Testing"

Added procedure in Attachment B of the O&M manual under "Cathodic Protection - Testing for Shorted Casing and Cathodic Protection - Pipe to Soil Survey"

- Finding 3:

Requirement of WAC 480-93-110 (5)(c) added to O&M manual page 18

- Finding 4:

Requirement of WAC 480-93-110 (3) added to O&M manual page 17

Instrument calibration, operation and maintenance procedure added in Attachment B sections P10 and P11

- Finding 5:

Requirement of 49 CFR 192.605(b)(8) added to O&M manual page 22

Audit form EM-3302-F2 has been created and included in the O&M manual (Attachment K)

- Finding 6:

Leak Survey procedure including the area surveyed has been added in to the O&M Manual (Attachment B P6).

- Finding 7:

Requirement of WAC 480-93-188(2) added to O&M Manual page 26

Instrument calibration operation and maintenance procedure added with maintenance

procedure (Attachment B P6)

- Finding 8

Leak survey frequency has been updated to 1 month in Attachment A of the O&M Manual

Please acknowledge receipt of this response, and let us know, should other actions be required from our part.

Sincerely,

**Pascal Mansy**

GBU Peroxides

Engineering & Maintenance Manager

3500 Industrial Way, Longview, WA 98632

T: +1-360-577-7800 - M: +1-713-702-3397



[www.solvay.com](http://www.solvay.com)

This message and any attachments is intended for the named addressee(s) only and may contain information that is privileged and/or confidential. If you receive this message in error, please delete it and immediately notify the sender. Any copying, dissemination or disclosure, either whole or partial, by a person who is not the named addressee is prohibited. We use virus scanning software but disclaim any liability for viruses or other devices which remain in this message or any attachments.

\*\*\*\*\*

Ce message, ainsi que toute pièce jointe, est exclusivement adressé au(x) destinataire(s) nommé(s) et peut contenir des informations confidentielles. Si vous recevez ce message par erreur, merci de le détruire et d'en avvertir immédiatement l'émetteur. Toute copie, transmission ou divulgation, intégrale ou partielle, par une personne qui n'est pas nommée comme destinataire est interdite. Nous utilisons un logiciel anti-virus mais nous déclinons toute responsabilité au cas où des virus, ou tout autre procédé, seraient contenus dans ce message ou toute pièce jointe.