

August 17, 2023

Scott Rukke  
Pipeline Safety Director  
WA Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503  
360-870-4923  
[scott.rukke@utc.wa.gov](mailto:scott.rukke@utc.wa.gov)

**RE: Audit Response – WA UTC Inspection #8612**

Dear Mr. Rukke,


This letter, prepared by EverLine Compliance on behalf of Nouryon Pulp and Performance Chemicals, provides the audit response to WA UTC inspection report #8612, dated August 11<sup>th</sup>, 2023.

**Probable Violation #1: 49 CFR 192.705 Transmission Line Patrolling** – The operator was not performing ROW patrols in 2020 and 2021 at the railroad crossing twice per year not to exceed 7.5 months. The patrol was being performed once a year for 2020 and 2021.

**Response** – For years 2020 and 2021, ROW patrols were being conducted once per year, which included the railroad crossing. In 2022, Nouryon began performing monthly ROW patrols alongside the required monthly leak surveys. Regarding how/when Nouryon plans on bringing this probable violation into full compliance, that was addressed in 2022 when the decision was made to perform monthly ROW patrols, which goes above and beyond the regulatory inspection requirements. It is also to be noted that while ROW patrols at the railroad crossing were only being done one time per year in 2020 and 2021, monthly leak surveys were taking place during this period. So eyes were on the ROW and the railroad crossing every month. To conclude, Nouryon was brought into full compliance in 2022 as monthly patrols and monthly leak surveys are both currently being conducted.

Please let us know if you have any further questions.

Respectfully,



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