



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

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April 15, 2016

Marie Therese Dominquez, Administrator
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
East Building, Room E27-314
1200 New Jersey Avenue Southeast
Washington, D.C. 20590

RE: Commission recommendations resulting from Plymouth LNG Incident

Dear Administrator Dominquez:

The Washington Utilities and Transportation Commission recently completed its work on the 2014 Plymouth LNG incident investigation report. That report was submitted to the Pipeline and Hazardous Materials Safety Administration on February 22, 2016.

As a result of that investigation, we have identified a number of opportunities to strengthen pipeline safety through stronger regulation and technical assistance. We ask PHMSA to consider administrative actions or proceedings to incorporate the lessons learned from our investigation to ensure that LNG liquefaction facilities, such as Plymouth, continue to operate safely. The commission recommends PHMSA consider the following:

1. Issue an **advisory bulletin** with:
 - Recommendations for the purging of gas, including standards for piping and vessel configuration, and the use of inert separators, molecular sieves, and combustible gas indicators.
 - Recommendations for establishing a startup sequence for a pressuring system before starting a heater.
 - Best practices regarding the awareness of brittle properties of adsorbers similar to those found at Plymouth when exposed to cryogenic temperatures.

2. Initiate a rulemaking to update **49 CFR 193** in response to the changing application of LNG throughout the country. These updates should include:

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- Operator qualifications;
- Standards for blind flanging when equipment is out of service;
- Proper start-up sequencing when putting a system back into service;
- Standards for safe purging of purification loops and other equipment used in the processing of LNG;
- Updated references to the most recent National Fire Protection Association code as well as other applicable codes; and
- Updated LNG regulations generally to align with changing trends in LNG use.

The commission is committed to keeping our state's pipeline facilities safe. We could not do that without our longstanding partnership with PHMSA. Thank you for your consideration of these recommendations. Please contact me or our pipeline safety director, Alan Rathbun, if you have questions about these recommendations. Mr. Rathbun can be reached at arathbun@utc.wa.gov or (360) 664-1219.

Sincerely,



David W. Danner
Chairman

cc: Chris Hoidal, PHMSA Western Region Director
Linda Daugherty, Deputy Associate Administrator
Alan Mayberry, Deputy Associate Administrator
Ken Lee, Director Engineering and Research