



## Committee Members

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## State of Washington Citizens Committee On Pipeline Safety

PO Box 47250 Olympia, WA 98504-7250 • [www.wutc.wa.gov/pipeline/ccops](http://www.wutc.wa.gov/pipeline/ccops)

January 31, 2008

Jeffrey D. Wiese, Associate Administrator for Pipeline Safety  
U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
East Building, 2nd Floor  
1200 New Jersey Ave., SE  
Washington, DC 20590

Dear Mr. Wiese:

At our January 2008 meeting, the Washington State Citizens Committee on Pipeline Safety was briefed on the proposed PHMSA Integrity Management Program Special Permit process concerning the seven-year reassessment intervals for gas transmission pipelines (IMP-SP). The Committee was impressed with the thoroughness of the outlined process. We would, however, like to make three important recommendations to the IMP-SP process.

1. Minimize the demand on scarce PHMSA resources and keep focused on the intent of Integrity Management, by placing the onus on the Operator to provide complete, accurate, and timely information through the special permit process.
2. Keep the public aware of all special permits and waivers granted, and the progress of special permits applied for, by utilizing the same docket information system currently being used by PHMSA for waivers to increase MAOP on pipelines. This current system includes all the information we believe should be easily publicly available including the initial application, supplemental information, correspondence, and the final permit. It would be even more useful, however, if the docket information was easier to find on the PHMSA website, which could easily be accomplished by having the special permit link on the PHMSA homepage take a person to an index of all individual special permit and waiver dockets with direct links to each. We believe this docketing system is the minimum public notice that should be provided, and would encourage and support a system of even greater public notification along those areas of the pipeline that would be included in these and other special permits and waivers.
3. The Washington Utilities and Transportation Commission, and similar regulatory agencies in other states with delegated pipeline authority, should be notified at the beginning of the process regarding any special permits or waivers that will apply to pipelines in their states.

Thanks for all the hard work that you and your organization have done on this important issue.

Sincerely,

Carl Weimer, Chairman

cc: Carl T. Johnson, Administrator, PHMSA  
Stacey Gerard, Assistant Administrator/Chief Safety Officer, PHMSA