



STATE OF WASHINGTON
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250
(360) 664-1160 • TTY (360) 586-8203

CERTIFIED MAIL

May 24, 2012

Tim Haynes
Vice President/Mill Manager
Longview Operations
Weyerhaeuser Company
3401 Industrial Way
PO Box 188
Longview, WA 98632

Dear Mr. Haynes:

RE: 2012 Weyerhaeuser-Ostrander Pipeline Operations and Maintenance Procedures and Plan Review

Staff from the Washington Utilities and Transportation Commission (staff) conducted an inspection of the Operations and Maintenance Procedures for the Weyerhaeuser-Ostrander Pipeline from May 15 to May 16, 2012. The inspection included a review of the Operations and Maintenance Manual (Manual) and the Emergency Procedures Manual (EPM).

Our inspection indicates one probable violation as noted in the enclosed report.

Your response needed

Please review the attached report and respond in writing by June 26, 2012. The response should include how and when you plan to bring the probable violations into full compliance.

What happens after you respond to this letter?

The attached report presents staff's decision on probable violations and does not constitute a finding of violation by the commission at this time.

After you respond in writing to this letter, there are several possible actions the commission, in its discretion, may take with respect to this matter. For example, the commission may:

- Issue an administrative penalty under RCW 81.88.040, or
- Institute a complaint, seeking monetary penalties, changes in the company's, practices, or other relief authorized by law, and justified by the circumstances, or
- Consider the matter resolved without further commission action.



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The attached report presents staff's decision on probable violation and does not constitute a finding of violation by the commission at this time.

Staff would like to thank Lee Galbraith, Ron Kosloski and Bob Cosentino, your contract operator, for their professionalism and cooperation during this inspection.

If you have any questions, or if we may be of any assistance, please contact Dennis Ritter at (360) 664-1159. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Lykken', with a long, sweeping horizontal line extending to the right.

David D. Lykken
Pipeline Safety Director

Enclosure

cc. Ron Kosloski, Weyerhaeuser Company
Bob Cosentino, Cosentino Consulting

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2012 Operations and Maintenance Procedures and Plan Review
Weyerhaeuser Company

The following probable violation(s) of WAC 480-93 were noted as a result of the Operations and Maintenance Procedures and Plan review of Weyerhaeuser's natural gas transmission pipeline in Cowlitz County. The inspection included a review of the Operation and Maintenance Manual (Manual), and the Emergency Procedures Manual (EPM).

PROBABLE VIOLATION(S)

1. **WAC 480-93-180 Plans and procedures.**

- (1) *Each gas pipeline company must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the gas pipeline company's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.*

Finding(s):

The following Weyerhaeuser procedures were not followed or are not adequate to meet the requirements of WAC 480-93-180(1). Specifically:

- a. 49 CFR §192.225 Welding Procedures. Subpart (a) requires operators to perform welding in accordance with procedures qualified under section 5 of API 1104 20th edition. The current welding procedure in Manual is qualified in accordance with the 19th edition of API 1104. You must re-qualify your procedure based on API 1104 20th edition.
- b. 49 CFR §192.751 Prevention of Accidental Ignition. Section 6.1 of the Manual details procedures to use when a hazardous atmosphere may be present while working around natural gas. The lower explosive limit is defined as 5% gas in air. However, this is a general characteristic for natural gas. The procedure does not state what Weyerhaeuser considers hazardous in terms of allowing workers to perform covered tasks. The procedure should identify the hazardous limits in which workers can be exposed while performing covered tasks.