



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**

September 26, 2013

Steve Smith  
Plant Manager  
Cardinal Pacific FG  
545 Avery Road West  
Winlock, WA 98596

Dear Mr. Smith:

**RE: 2013 Natural Gas Standard Inspection – Cardinal Pacific FG - Winlock**

Staff from the Washington Utilities and Transportation Commission (staff) conducted a standard inspection on September 16-17, 2013 of Cardinal Pacific FG. The inspection included a field and records review.

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 October 28, 2013. 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.

We have not yet decided whether to pursue a complaint or penalty in this matter. Should an administrative-law judge decide to pursue a complaint or penalty, your company will have an opportunity to present its position directly to the commissioners.



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If you have any questions or if we may be of any assistance, please contact Dave Cullom at (360) 664-1141. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,



David D. Lykken  
Pipeline Safety Director

Enclosure

cc: Robert L. Cosentino, Cosentino Consulting  
Chuck Miller, Cardinal Pacific FG, Mechanical Engineer

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**  
**2013 Natural Gas Standard Intrastate Inspection**  
**Cardinal Pacific FG**

The following probable violation of WAC 480-93 was noted as a result of the 2013 Intrastate Natural Gas Standard inspection of the Cardinal Pacific FG Winlock facility. The inspection included a review of both records and pipeline facilities.

**PROBABLE VIOLATION**

1. **WAC 480-93-170 Tests and reports for pipelines.**
  - (10) *Pressure testing equipment must be maintained, tested for accuracy, or calibrated, in accordance with the manufacturer's recommendations. When there are no manufacturer's recommendations, then pressure testing equipment must be tested for accuracy at an appropriate schedule determined by the gas pipeline company. Test equipment must be tagged with the calibration or accuracy check expiration date. The requirements of this section also apply to equipment such as pressure charts, gauges, dead weights or other devices used to test, monitor or check system pressures or set-points.*

**Finding:**

Cardinal failed to tag pressure gauges used to monitor or check system pressures with the calibration or accuracy check expiration date.