



STATE OF WASHINGTON  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250  
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**CERTIFIED MAIL**

October 3, 2014

Grant M. Yoshihara  
Vice President of Utility Operations  
Northwest Natural  
220 NW Second Avenue  
Portland, OR 97209

Dear Mr. Yoshihara:

**RE: 2014 Standard Natural Gas Safety Inspection – Columbia Gorge - (Insp. No. 5818)**

Staff from the Washington Utilities and Transportation Commission (staff) conducted a standard inspection from August 26-29, 2014, of Northwest Natural's (NWN) Columbia Gorge pipeline system. The inspection included a records review and inspection of NWN's pipeline facilities.

Our inspection indicates four probable violations as indicated in the enclosed report.

**Your response needed**

Please review the attached report and respond in writing by November 5, 2014. 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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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.

We would like to thank NWN's personnel for their professionalism and cooperation during this inspection.

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: Kerry F. Shampine, Manager, Code Compliance, Northwest Natural

**UTILITIES AND TRANSPORTATION COMMISSION**  
**2014 Natural Gas Pipeline Safety Inspection**  
**Northwest Natural – Columbia Gorge**

The following probable violations of WAC 480-93 were noted as a result of the 2014 inspection of the Northwest Natural (NWN) – Columbia Gorge. The inspection included a random selection of records, operation and maintenance (O&M), emergency response, inventory, and field inspection of the pipeline facilities.

**PROBABLE VIOLATIONS**

1. **WAC 480-93-188 Gas leak surveys.**

- (2) *Each gas pipeline company must maintain, test for accuracy, calibrate and operate gas detection instruments in accordance with the manufacturer's recommendations. If there are no written manufacturer's recommendations or schedules, then the gas pipeline company must test such instruments for accuracy at least monthly, but not to exceed forty-five days between testing, and at least twelve times per year. The gas pipeline company must recalibrate or remove from service any such instrument that does not meet applicable tolerances. Records of accuracy checks, calibration and other maintenance performed must be maintained for five years.*

**Finding(s):**

NWN has not produced a calibration report for the leak detection unit #402356 used for leak surveys on 5/14/12, 5/16/12, and 5/18/12.

NWN has not produced a calibration report for the leak detection unit #402357 used for leak surveys on 6/13/12.

2. **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):**

NWN's definition of a business district is less stringent than what code requires. NWN's definition conflicts with the definition adopted in code by not considering buildings to be part of a business district until they are groups of buildings over 1000 continuous feet in one direction and that the gas main and/or services must be under continuous pavement from the gas facility to the building wall.

**WAC 480-93-005 (3) Definitions:**

*"Business district" means an area where the public regularly congregates or where the majority of the buildings on either side of the street are regularly utilized, for financial, commercial, industrial, religious, educational, health, or recreational purposes.*

***NWN Standard Practice Washington Rev 3-25-13 reads:***

*“Business district – An area containing gas mains or services (facilities) measuring at least 1000 continuous feet in length in at least one direction, where the public regularly congregates or where the majority of the buildings on either side of the street are regularly used for financial, commercial, industrial, religious, educational, health, or recreational purposes; and Where the gas mains and/or services are predominantly located under continuous pavement extending from the centerline of the gas facility to the building wall; or Any other area that, in NW Natural’s judgment should be so designated.”*

3. **WAC 480-93-188 Gas leak surveys.**

- (3) *Each gas pipeline company must conduct gas leak surveys according to the following minimum frequencies:*
- (a) *Business districts - at least once annually, but not to exceed fifteen months between surveys. All mains in the right of way adjoining a business district must be included in the survey;*

**Finding(s):**

There are no business districts identified in Washington for the Columbia Gorge inspection unit. No areas have been leak surveyed since 2011. January 2011 is as far back as the report indicates.

The operator’s definition of a business district is less stringent than what the code requires. White Salmon, Bingen, North Bonneville (Evergreen Drive), and areas of Carson likely meet the definition of a business district as defined in WAC 480-93-005(3).

4. **WAC 480-93-188 Gas leak surveys.**

- (3) *Each gas pipeline company must conduct gas leak surveys according to the following minimum frequencies:*
- (b) *High occupancy structures or areas - at least once annually, but not to exceed fifteen months between surveys;*

**WAC 480-93-005 (14) Definitions:**

*"High occupancy structure or area" means a building or an outside area (such as a playground, recreation area, outdoor theater, or other place of public assembly) that is occupied by twenty or more persons on at least five days a week for ten weeks in any twelve-month period. (The days and weeks need not be consecutive.)*

**Finding(s):**

Missing High Occupancy Structure – Bonneville Hot Springs Resort & Spa.

Address: 1252 E Cascade Dr., North Bonneville, WA 98639 – It was not on the list that was provided during the inspection. There were only seven buildings identified for the entire unit. This building has been open to the public and in business for some time and there is no record of it being part of the NWN’s special building survey.