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January 8, 2015

David Lykken- Director of Pipeline Safety Program
State of Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P.O. Box 47250
Olympia, WA 98504-7250

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Pipeline Safety Program

Subject: Response to 2014 Natural Gas Standard Inspection – Mt Vernon District (Insp. No. 5840)

Dear Mr. Lykken,

This letter is intended to address the probable state safety code violation. We specifically are addressing how we have brought the probable violation into full compliance. The inspection was conducted from October 28-30, 2014 in Mt. Vernon, Washington.

PROBABLE VIOLATION

1. WAC 480-93-178 Protection of plastic pipe

- (2) *The gas pipeline company must follow the manufacturer's recommendation for maximum cumulative ultraviolet light exposure limit for plastic pipe. If there is no such recommendation, the gas pipeline company must not expose plastic pipe to ultraviolet light for more than two years. Each gas pipeline company must include the applicable ultraviolet exposure time limit in its procedures manual.*

Finding(s):

Inspection of the CNGC Mount Vernon yard, staff found two spools of plastic pipe with manufacture date over 2 years. Additional research by CNGC found that the expired material had been used in a service line. CNGC was affecting repairs by removing the expired material from the ground and disposing of it. Staff noticed that the questionable material from the yard was placed in a recycle or trash container the next day (10/30/2014).

Cascade Response

On November 6, 2014, CNGC completed the replacement of the expired PE pipe that had been mistakenly installed at 2499 Pete's Lane in Oak Harbor WA. As a corrective measure, CNGC reviewed the required two year shelf life for PE pipe per CP 607 on November 17, 2014 with Mt Vernon district personnel. Additional preventative measures were also implemented to ensure that expired PE pipe would not be installed in any district. The first was an update to the PEF 192-1408 Installation of Plastic Pipe to include questions on the qualification test regarding the two year expiration requirement. The second is an update the Construction Inspection Checklist (CNG 640) to include the verification of any PE pipe on the job site. CNGC has brought this probable violation into full compliance.

Please contact Mike Eutsey at (509) 734-4576 with questions or comments.

Respectfully Submitted,

Eric Martuscelli
Vice President, Operations
Cascade Natural Gas Corporation