



STATE OF 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 1, 2015

Joseph Ertolacci
Vice President, Camas Mill Operations
Georgia-Pacific Consumer Products (Camas) LLC
401 NE Adams Street
Camas, WA 98607

Dear Mr. Ertolacci:

RE: 2015 Natural Gas Operations and Maintenance Review Inspection– Georgia-Pacific Consumer Products (Camas) LLC (Insp. No. 5860)

Staff from the Washington Utilities and Transportation Commission (staff) conducted a review of the Georgia-Pacific Consumer Products (Camas) LLC (GP), Operations and Maintenance Manual from May 18 - 29, 2015.

Our review indicates eight probable violations as noted in the enclosed report.

Your response needed

Please review the attached report and respond in writing by October 2, 2015. 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:

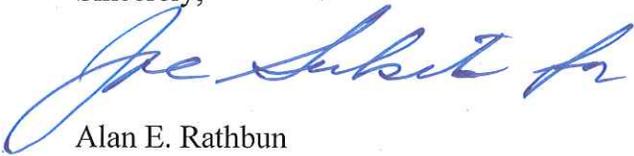
- Issue an administrative penalty under RCW 81.88.040, or;
- Institute a complaint, seeking monetary penalties, changes in the company's practices, or other relief authorized by law, and justified by the circumstances, or;
- Consider the matter resolved without further commission action.

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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.

If you have any questions or if we may be of any assistance, please contact Anthony Dorrrough at (360) 664-1318. Please refer to the subject matter described above in any future correspondence pertaining to this review.

Sincerely,



Alan E. Rathbun
Pipeline Safety Director

Enclosure

cc: Carson Blocker, Reliability Engineer, Georgia-Pacific
Ron Simmons, Audit Program Manager, Georgia-Pacific
Roy Rogers, P.E., Consultant Cathodic Protection Engineering Inc., Georgia-Pacific
Robert L. Cosentino, Cosentino Consulting

UTILITIES AND TRANSPORTATION COMMISSION
2015 Natural Gas Operations and Maintenance Review Inspection
Georgia-Pacific Consumer Products (Camas) LLC

The following probable violations of Title 49 CFR Parts 191, 192 and WAC 480-93 were noted as a result of the 2015 inspection of the Georgia-Pacific Consumer Products (Camas) LLC (GP). The inspection included a review of the operation and maintenance (O&M) manual.

PROBABLE VIOLATIONS

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 C.F.R. §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.*

Finding(s):

WAC 480-93-200(7)(b) addresses reporting damage events that occur without a facility locate. These requirements were not addressed in GP's manual.

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 C.F.R. §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.*

Finding(s):

WAC 480-93-200(7)(c) addresses retaining damage claim records. These requirements were not addressed in GP's manual.

3. **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 C.F.R. §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.*

Finding(s):

WAC 480-93-200(8)(a) addresses notification requirements for excavators involved in a damage event. These requirements were not addressed in GP's manual.

4. **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 C.F.R. §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.*

Finding(s):

WAC 480-93-200(8)(b) addresses excavators responsibility for reporting a damage event. These requirements were not addressed in GP's manual.

5. **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 C.F.R. §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.*

Finding(s):

WAC 480-93-200(8)(c) addresses information concerning filing a complaint with the safety committee. These requirements were not addressed in GP's manual.

6. **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 C.F.R. §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.*

Finding(s):

WAC 480-93-200(9)(b) addresses the intentional damage or removal of location marks for gas pipeline facilities. These requirements were not addressed in GP's manual.

7. **49 CFR 192.614 Damage Prevention Program**

- (a) *Each operator of a buried pipeline must carry out, in accordance with this section, a written program to prevent damage to that pipeline from excavation activities. For purposes of this section, the term "excavation activities" includes excavation, blasting, boring, tunneling, backfilling, the removal of aboveground structures by either explosive or mechanical means, and other earthmoving operations.*

Finding(s):

There were no procedures for taking actions necessary to protect facilities from dangers posed by drilling and other trenchless technologies.

8. **49 CFR 192.617 Investigation of Failures**

Each operator shall establish procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for the laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of a recurrence.

Finding(s):

Procedures for reviewing records of accidents and failures due to excavation damage for the purpose of preventing reoccurrence were not addressed in GP's manual.