

October 08, 2015

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

Alan Rathbun
Pipeline Safety Director
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
Olympia WA, 98504-7250

Dear Mr. Rathbun:

Please find attached the Georgia Pacific Camas response to the 2015 Natural Gas Operations and Maintenance Review Inspection – Georgia Pacific Consumer Products (Camas) LLC (Insp. No. 5860),

Should you have any questions please do not hesitate to contact us directly.

Sincerely,



Joseph Ertolacci
Vice President Camas Mill Operations
Georgia Pacific, Camas

cc Cosentino Consulting Inc.
Pipeline facility files

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Response to 2015 Natural Gas Operations and Maintenance Review Inspection –
Georgia Pacific Consumer Products (Camas) LLC (Insp. No. 5860),

1. **WAC 480-93-200(7)(b)**

(7) In the event of damage to a gas pipeline, each gas pipeline company must provide to the commission the following information using either the commission's web-based damage reporting tool or its successor, or the damage reporting form located on the commission's web site:

(b) If the damage is believed by the company to be the result of an excavation conducted without a facilities locate first being completed, the gas pipeline company must also report the name, address, and phone number of the person or entity that the company has reason to believe may have caused the damage. The company must include this information in the comment section of the web-based damage reporting tool form or send it to the commission separately. If the company chooses to send the information separately, it must include sufficient information to allow the commission to link the name of the party believed to have caused the damage with the damage event reported through the damage reporting tool.

Finding(s):

These requirements were not addressed in GP's manual.

Response:

GP has revised section 9 of the facility O&M manual to include this requirement. See attachment 1 for the revised manual section.

2. **WAC 480-93-200(7)(c)**

(7) In the event of damage to a gas pipeline, each gas pipeline company must provide to the commission the following information using either the commission's web-based damage reporting tool or its successor, or the damage reporting form located on the commission's web site:

(c) Each gas pipeline company must retain all damage and damage claim records it creates related to damage events, including photographs and documentation supporting the conclusion that a facilities locate was not completed, reported under subsection (b) of this section, for a period of two years and make those records available to the commission upon request.

Finding(s):

These requirements were not addressed in GP's manual.

Response:

GP has revised section 9 of the facility O&M manual to include this requirement. See attachment 1 for the revised manual section.

3. **WAC 480-93-200(8)(a)**

(8) Each gas pipeline company must provide, to an excavator who damages a gas pipeline facility, the following information set forth in chapter 19.122 RCW:

(a) Notification requirements for excavators under RCW 19.122.050(1)

Finding(s):

These requirements were not addressed in GP's manual.

Response:

GP has revised section 9 of the facility O&M manual to include this requirement. See attachment 1 for the revised manual section.

4. **WAC 480-93-200(8)(b)**

(8) Each gas pipeline company must provide, to an excavator who damages a gas pipeline facility, the following information set forth in chapter 19.122 RCW:

(b) A description of the excavator's responsibilities for reporting damages under RCW 19.122.053

Finding(s):

These requirements were not addressed in GP's manual.

Response:

GP has revised section 9 of the facility O&M manual to include this requirement. See attachment 1 for the revised manual section.

5. **WAC 480-93-200(8)(c)**

(8) Each gas pipeline company must provide, to an excavator who damages a gas pipeline facility, the following information set forth in chapter 19.122 RCW:

(c) Information concerning the safety committee referenced under RCW 19.122.130, including committee contact information, and the process for filing a complaint with the safety committee.

Finding(s):

These requirements were not addressed in GP's manual.

Response:

GP has revised section 9 of the facility O&M manual to include this requirement. See attachment 1 for the revised manual section.

6. **WAC 480-93-200(9)(b)**

(9) Each gas pipeline company must report to the commission the details of each instance of the following when the company or its contractor observes or becomes aware of either of these events:

(b) A person intentionally damages or removes marks indicating the location or presence of gas pipeline facilities.

The company must only report information to the extent that an employee or contractor of the company observes or becomes aware of these events.

Finding(s):

These requirements were not addressed in GP's manual.

Response:

GP has revised section 9 of the facility O&M manual to include this requirement. See attachment 1 for the revised manual section.

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

(a) Except as provided in paragraphs (d) and (e) of this section, 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 the 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.

Response:

GP has revised O&M Procedure P-2 to address excavation by drilling or other trenchless technologies. See attachment 2.

8. **49CFR 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 laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of a recurrence.

Finding(s):

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

Response:

GP has revised O&M Procedure P-2 to address excavation by drilling or other trenchless technologies. See attachment 2.

GP has revised O&M manual section 8, sub section 8.8.1 to include excavation damage. See attachment 3.

ATTACHMENT 1

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9.2.8 WUTC Damage Reporting, Records & Processes

.1 GP Camas will provide the WUTC details of the damage event within forty-five days of the event using the commission's virtual private damage information reporting tool (DIRT) report form. The following information will be reported;

- (a) The name of the person submitting the report.
- (b) The date and time of the damage event.
- (c) The address where the damage event occurred.
- (d) The type of right-of-way, where the damage event occurred, including but not limited to City Street, state highway, or utility easement.
- (e) The type of underground facility damaged, including but not limited to pipes, transmission pipelines, distribution lines, sewers, conduits, cables, valves, lines, wires, manholes, attachments, or parts of poles or anchors below ground.
- (f) The type of utility service or commodity the underground facility stores or conveys, including but not limited to electronic, telephonic or telegraphic communications, water, sewage, cablevision, electric energy, petroleum products, gas, gaseous vapors, hazardous liquids, or other substances.
- (g) The type of excavator involved, including but not limited to contractors or facility operators.
- (h) The excavation equipment used, including but not limited to augers, bulldozers, backhoes, or hand tools.
- (i) The type of excavation being performed, including but not limited to drainage, grading, or landscaping.
- (j) Whether a one-number locator service was notified before excavation commenced, and, if so, the excavation confirmation code provided by a one-number locator service.

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(k) If applicable;

(i) The person who located the underground facility, and their employer.

(ii) Whether underground facility marks were visible in the proposed excavation area before excavation commenced.

(iii) Whether underground facilities were marked correctly.

(l) Whether an excavator experienced interruption of work as a result of the damage event.

(m) A description of the damage.

(n) Whether the damage caused an interruption of underground facility service.

.2 GP will retain all damage and damage claim records it creates related to damage events for a period of two years and make those records available to the commission upon request. Typical records will include the following;

(a) photographs supporting the conclusion that a facilities locate was not completed

(b) documentation supporting the conclusion that a facilities locate was not completed

.3 GP Camas will provide the excavator who damages a gas pipeline facility, the following information;

(a) A description of the excavator's responsibilities for reporting damages under Washington law. These responsibilities are;

I. An excavator who, in the course of excavation, contacts or damages an underground facility shall notify the facility

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operator and a one-number locator service, and report the damage.

II. If the damage causes an emergency condition, the excavator causing the damage shall also alert the appropriate local public safety agencies and take all appropriate steps to ensure the public safety.

III. No damaged underground facility may be buried until it is repaired or relocated.

(b) Information concerning the WUTC safety committee including committee contact information, and the process for filing a complaint with the safety committee. This information can be found at the following link;

<http://www.utc.wa.gov/publicSafety/pipelineSafety/Pages/Safety-Committee.aspx>

.4 GP Camas will report to the commission the details of each instance of the following when the company or its contractor observes or becomes aware of either of these events;

(a) An excavator digs within thirty-five feet of a transmission pipeline without first obtaining a locate.

(b) A person intentionally damages or removes marks indicating the location or presence of gas pipeline facilities

9.2.9 Address for WUTC reporting

WUTC reports shall be sent to the following address.

Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr., S.W.
P.O. Box 47250
Olympia, WA 98504-7250

ATTACHMENT 2

 DRAFT	Date Issued September 31, 2015	Page No. 1 of 2	Reference DOT Part 192.614
	Revision # 2D	Subject: PROCEDURE P-2 Pipeline Excavation	

1 PURPOSE

The purpose of this procedure is to provide direction for employees to protect company facilities when excavating within 10 feet of underground piping.

2 DEFINITIONS

PROBE A slender bar with a soft metal tip which can be pushed into the soil using hand pressure to locate the buried pipeline.

BARRED TEETH The placing of a steel plate across the teeth of a backhoe or excavator bucket to prevent the tooth from directly striking the pipeline should contact occur.

3 PRIOR TO EXCAVATION

- .1 Verify a locate has been performed.
- .2 Verify that either an Exposed Pipe Report, form F-10 is available or means are available to record the required data for completing the form at a later time.
- .3 Involved personnel should be aware of the trench safety guidelines.

4 PROCEDURE – STANDARD EXCAVATION

- .4 Confirm a qualified Company representative is present at all times.
- .5 Any coating damaged during excavation shall be repaired by qualified personnel before backfilling. However, coating damage is to be avoided.
- .6 The Pipeline shall be exposed using the following steps:
 - a. There always shall be a “spotter or swamper” present to assist the backhoe operator in avoiding the pipeline, and watch the excavation as the backhoe operator removes soil near the pipeline.
 - b. The backhoe teeth may be barred or plated at the discretion of the qualified Company representative.
 - c. Probe the line and accurately mark the alignment.
 - d. If the line is too deep for the probe bar, first ensure that there are no obstructions in the way, then excavate down in depths of at least two feet less than the depth to which the probe has reached and probe from the bottom of the excavation.
 - e. Alternative methods may be used at the discretion of the qualified Company representative
 - f. Allow the backhoe to continue soil removal, but ensure that the bucket stops no closer than one foot from the top of the pipeline.

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- g. When complete, hand-dig a test hole until the pipeline is located with the hand shovel and the line is visible.
- h. The backhoe can then dig around the line as necessary, but only as long as the line is in view and a spotter is in place. At no time shall the backhoe bucket come within one foot of the pipeline.
- i. If blasting activities occur near the pipeline, a special leak survey will be conducted.

5 PROCEDURE – BORE CROSSING

- .1 Confirm a qualified Company representative is present at all times.
- .2 Any coating damaged during excavation shall be repaired by qualified personnel before backfilling. However, coating damage is to be avoided.
- .3 Before to the bore crossing the pipeline, with the Pipeline shall be exposed at the bore crossing using the standard excavation procedure.
- .4 With the pipeline exposed, proceed with the bore while observing the exposed pipeline to confirm the bore does not come in contact with the pipeline and has the minimum separation from the bore as specified by the Pipeline Coordinator.
- .5 Bury the pipeline when the bore is complete.
- .6 Complete and file an Exposed Pipe Report.

ATTACHMENT 3

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- d. Civil unrest
- e. Natural disaster
- .4 The GP Camas Pipeline Coordinator with assistance from the Contracted Operator shall ensure that any other malfunction of a component, deviation from normal Operation, or Personnel error that could cause a hazard to persons or property is investigated and appropriate actions are taken to correct the condition or eliminate the potential hazard.

8.6 Return to Normal Operations

[\$192.605(c)(2)]

After the cause of the abnormal condition has been identified and corrected, normal Operations may only be restored after the Operator has contacted and confirmed normal Operations with impacted third-parties at delivery and receipt stations.

8.7 Abnormal Operation Investigation

[\$192.605(e)]

- .1 The GP Camas Pipeline Coordinator with assistance from the Contracted Operator shall investigate all occurrences of Abnormal Operation and take corrective action, if necessary.
- .2 As soon as possible after an occurrence of Abnormal Operation, the GP Camas Pipeline Coordinator with assistance from the Contracted Operator will document all possible information concerning the incident, identifying any remedial actions taken or planned.

8.8 Failure Investigation

[\$192.617]

In the event of an explosion, fire, death, or injury, personnel must not remove any suspected gas facility until the WUTC or the lead investigative authority has designated the release of the gas facility. Once the situation is made safe, the operator must keep the facility intact until directed by the lead investigative authority.

- .1 GP Camas will investigate failures, near failures and excavation damage in order to identify their root cause and initiate actions to eliminate the possibility of reoccurrence.
- .2 Aspects of failure analysis will be:
 - a. Subjecting failed pipe or components to laboratory analysis in order to identify integrity issues.