



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

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**CERTIFIED MAIL**

June 30, 2015

Tim Haynes  
Vice President/Mill Manager, Longview Operations  
Weyerhaeuser Company  
3401 Industrial Way  
PO Box 188  
Longview, WA 98632

Dear Mr. Haynes:

**RE: 2015 Natural Gas Integrity Management Program Inspection – Weyerhaeuser Company-Weyerhaeuser-Ostrander Pipeline – (Insp. No. 6183)**

Staff from the Washington Utilities and Transportation Commission (staff) conducted a natural gas Integrity Management Program inspection from June 15 - 16, 2015, of Weyerhaeuser Company's Weyerhaeuser-Ostrander pipeline. The inspection included a records review and inspection of the pipeline facilities.

Our inspection indicates three probable violations as noted in the enclosed report. We also noted two areas of concern, which unless corrected, could potentially lead to future violation of state and/or federal pipeline safety rules.

**Your response needed**

Please review the attached report and respond in writing by July 31, 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;

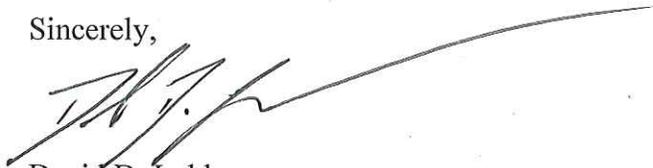
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- Institute a complaint, seeking monetary penalties, changes in the company's practices, or other relief authorized by law, and justified by the circumstances, or;
- Consider the matter resolved without further commission action.

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.

If you have any questions or if we may be of any assistance, please contact Dennis Ritter at (360) 664-1159. 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: Stefano Schnitger, Operations Manager, Weyerhaeuser Company  
Robert L. Cosentino, Cosentino Consulting

**UTILITIES AND TRANSPORTATION COMMISSION**  
**2015 Natural Gas Integrity Management Inspection**  
**Weyerhaeuser Company**  
**Weyerhaeuser-Ostander Pipeline**

The following probable violations and areas of concern of Title 49 CFR Part 192 and WAC 480-93 were noted as a result of the 2015 Integrity Management Program (IM) inspection of the Weyerhaeuser-Ostander Pipeline. The inspection included a random selection of records, a review of the IM plan and field inspection of the pipeline facilities.

**PROBABLE VIOLATIONS**

1. **49 CFR §192.911 What are the elements of an integrity management program?**  
*(1) A quality assurance process as outlined in ASME/ANSI B31.8S, section 12.*

**Finding(s):**

ASME B31.8S, Section 12 states in part,

- (3) results of the integrity management program and the quality control program shall be reviewed at predetermined intervals, making recommendations for improvement.*

The Integrity Management Plan Section 12.2.1 requires an independent audit of the IM within 12 months of initial release and 24 months thereafter. Records, however, do not indicate reviews have been completed as required and no record was available in Appendix J as required by 12.3 of the IM.

2. **49 CFR §192.13 What general requirements apply to pipelines regulated under this part?**  
*(c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.*

**Finding(s):**

Section 11 of the IM requires the Pipeline Manager to update the IM based on a variety of potential changes. Section 11.3 then requires the Manager to approve the changes by completed the revision history log in the title page of the IM. The revision history log of the Pipeline Manager's IM (control document) has many "sticky tabs" and written notes which indicate reviews have occurred. The last entry in the revision history log was April 2012. This would indicate multiple reviews have occurred yet the IM has not been revised since its initial implementation in 2007. The inspection revealed there have also been multiple threat affecting initiatives which Weyerhaeuser has conducted but have not been reflected in the IM--2009 hydrotest assessment, EFRD analysis and McNeely creek armoring.

3. **49 CFR §192.917 How does an operator identify potential threats to pipeline integrity and use the threat identification in its integrity program?**  
(c) *Risk assessment. An operator must conduct a risk assessment that follows ASME/ANSI B31.8S, section 5, and considers the identified threats for each covered segment. An operator must use the risk assessment to prioritize the covered segments for the baseline and continual reassessments (§ § 192.919, 192.921, 192.937), and to determine what additional preventive and mitigative measures are needed (§ 192.935) for the covered segment.*

**Finding(s):**

Weyerhaeuser indicates there has been no change in the pipeline or its surroundings since implementation of the plan and the entire pipeline is an HCA and as a result there has not been a IM plan revision (still on Rev. 0). However there have been IM related activities which are not documented in the IM plan and which affect risk ranking--2009 hydro test for IM assessment; EFRD analysis, McCreedy Creek armoring. The results of these activities need to be weighed against identified threats and the risk assessment re-evaluated per the IM.

**AREAS OF CONCERNS**

1. **49 CFR §192.7 What documents are incorporated by reference partly or wholly in this part?**  
(a) *Any documents or portions thereof incorporated by reference in this part are included in this part as though set out in full. When only a portion of a document is referenced, the remainder is not incorporated in this part.*

**Finding(s):**

ASME B31.8S-2004, "Managing System Integrity of Gas Pipelines," is incorporated by reference per 49 CFR §192.7. Section 12.2.2(b) includes 7 "should" statements that operators of gas pipelines in an integrity management program ought to have in their Quality Control portion of the IM program. These statements are not identified outright in the Plan, however, it is evident that Weyerhaeuser's IM program does perform these tasks. For clarity, these statements should be addressed specifically in the Plan to aid in overall Quality Control management of the IM Plan.

2. **49 CFR §192.935 What additional preventive and mitigative measures must an operator take?**  
(a) *General requirements. An operator must take additional measures beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in a high consequence area. An operator must base the additional measures on the threats the operator has identified to each pipeline segment. (See § 192.917) An operator must conduct, in accordance with one of the risk assessment approaches in ASME/ANSI B31.8S (incorporated by reference, see § 192.7), section 5, a risk analysis of its pipeline to identify additional measures to protect the high consequence area and enhance public safety. Such additional measures include, but are not limited to, installing*

*Automatic Shut-off Valves or Remote Control Valves, installing computerized monitoring and leak detection systems, replacing pipe segments with pipe of heavier wall thickness, providing additional training to personnel on response procedures, conducting drills with local emergency responders and implementing additional inspection and maintenance programs.*

- (b) *Third party damage and outside force damage-*
- (2) *Outside force damage. If an operator determines that outside force (e.g., earth movement, floods, unstable suspension bridge) is a threat to the integrity of a covered segment, the operator must take measures to minimize the consequences to the covered segment from outside force damage. These measures include, but are not limited to, increasing the frequency of aerial, foot or other methods of patrols, adding external protection, reducing external stress, and relocating the line.*

**Finding(s):**

During field reconnaissance of the pipeline on Ostrander Road, cracks were noticed in the roadway in areas where road is "sliding." The pipeline in this area is located in the roadway shoulder. Slides are not listed as a threat in the IM. Weyerhaeuser should evaluate this condition and determine if a threat exists.