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July 17, 2015

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

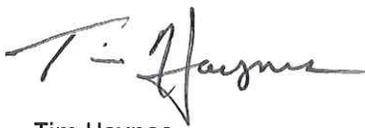
Dear Mr. Lykken:

Re: 2015 Integrity Management Inspection – Weyerhaeuser Longview

Please find enclosed the Weyerhaeuser Longview response to the 2015 Integrity Management Inspection.

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

Sincerely,



Tim Haynes  
Vice President/Mill Manager

cc: Cosentino Consulting Inc.

Pipeline facility files

## Response to 2015 Integrity Management Inspection – Weyerhaeuser Longview

### 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 B3/8S, section 12.*

ASME/ANSI B3/8S, 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.*

#### Finding(s):

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 1M.

#### Response(s):

- a. Weyerhaeuser has revised the Integrity Management plan to conform with the review practices of their other pipeline facility manuals with the intent of eliminating the confusion of having different audit requirements.
- b. Weyerhaeuser will submit the revised Integrity Management plan by September 1, 2015

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 McCreedy creek armoring.

**Response(s):**

- a. Weyerhaeuser has revised the Integrity Management plan to conform with the review practices of their other pipeline facility manuals. At the time of the review, any changes will be incorporated into the manual.
- b. Weyerhaeuser will submit the revised Integrity Management plan by September 1, 2015 which will incorporate all of the previous threat affecting initiatives as discussed in the findings.

**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 an 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 reevaluated per the IM.

**Response(s):**

- a. Weyerhaeuser has revised the Integrity Management plan to conform with the review practices of their other pipeline facility manuals. At the time of the review, changes including any as the result of reevaluation of threats will be incorporated into the manual.
- b. Weyerhaeuser will submit the revised Integrity Management plan by September 1, 2015 which will incorporate all of the previous threat affecting initiatives as discussed in the findings.

## Response to 2015 Integrity Management Inspection – Weyerhaeuser Longview

### Areas of Concern

#### 1. 49 CFR §1 92.7 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 83 1.8S-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 1M program. These statements are not identified outright in the Plan, however, it is evident that Weyerhaeuser's 1M 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 1M Plan.

#### **Response(s):**

- a. Weyerhaeuser will revise the Integrity Management plan to address the finding. Section 1.6 of the plan includes treatment of "should" statements.
- b. Weyerhaeuser will submit the revised Integrity Management plan by September 1, 2015 which will incorporate all of the previous threat affecting initiatives.

**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 o/the risk assessment approaches in ASME/ANSI 831.8S (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.

**Response(s):**

Weyerhaeuser will perform an evaluation of the identified area and of the pipeline in general to determine if land movement is a viable threat.

If land movement is determined to be a viable threat, the Weyerhaeuser IM plan will be revised as needed.