

November 19, 2015

re: 2015 Hydrogen Gas Pipeline Standard Inspection – AkzoNobel, Moses Lake, WA –
Inspection Number 6198

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 AkzoNobel response to the 2015 Hydrogen Gas Pipeline Standard
Inspection – AkzoNobel, Moses Lake, WA – Inspection Number 6198

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

Sincerely,



Patrick Ealy
Facility Manager
Akzo Nobel, Moses Lake

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REGIONS MANAGEMENT
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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Response to the 2015 Hydrogen Gas Pipeline Standard Inspection – Akzo Nobel, Moses Lake, WA – Inspection Number 6198

1. WAC 480-93-188 Gas leak surveys

(3) *Each gas pipeline company must conduct gas leak surveys according to the following minimum frequencies:*

(e) *Unodorized gas pipelines - at least monthly.*

Finding:

The hydrogen pipeline is unodorized. The required leak survey frequency is at least monthly. Leak surveys were performed in February and January 2015 with expired operator qualifications. In March, April, May, June and July of 2015, there was no documentation that leak surveys were performed. Previously in 2013 and 2014, the leak surveys were all complete and the operator performing the covered task had current qualifications.

Response:

Regarding the leak surveys performed by personnel with expired qualifications. Akzo Nobel has revised how it tracks the need for personnel requalification. These items are now tracked in a software based tracking system along with other plant compliance activities as opposed as separate items. See Attachment 1

Regarding the missing leak surveys for March, April, May, June and July of 2015. These records existed as hard copies which had not been scanned into the electronic record by Akzo's regulatory consultant prior to the audit. This omission resulted in the appearance that Akzo had not performed the required survey which is not the case. The missing leak surveys have since been scanned and are now part of the electronic record. See Attachment 2.

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:

There were two leak surveys being performed by an employee that exceeded the three year requalification interval. These surveys were performed in January and February 2015 with qualifications that were not current. The operator did not follow their procedure to ensure that there was no lapse in qualifications. The re-evaluation interval is three years per the operator qualification manual in section 5.12.

Response:

Akzo Nobel has revised how it tracks the need for personnel requalification. This item is now tracked in a software based tracking system along with other plant compliance activities as opposed as separate items.

ATTACHMENT 1

AKZO Nobel – Moses Lake

 AKZO Nobel	Date Issued September 4, 2012	Page No. 1 of 2	Reference PHMSA Part 192.706
ISSUED	Revision # 1	Subject: FORM F-14 Leak Survey & Investigation Report	

Report date: <u>3-26-15</u>	
If this survey or investigation is the result of third party notification, complete this section:	
Name of person reporting the possible leak: _____	
Address of person reporting the leak: _____	
Name of person performing the survey or investigation: <u>Lind Bingham</u>	
Name and serial number of the instrument (s) used: <u>ORAC II 181-138526</u>	
Date the instrument was last calibrated: <u>3-26-15</u>	
Describe the area to be surveyed: <u>V-5601 - V-5602</u>	
Why was the survey performed? (<u>scheduled</u> , special, reported leak, other)	
Was gas detected? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> <small>(circle one)</small>	Enter Gas Concentration Here _____
Time leak was found: _____	
Pipeline Manager Signature <u>Lind Bingham</u>	Date <u>3-26-15</u>
IF NO LEAK WAS FOUND, THIS REPORT IS COMPLETED AND ONLY THIS PAGE NEED BE RETAINED.	
IF A LEAK IS DISCOVERED THE HYDROGEN PIPELINE IS TO BE SHUT DOWN AND THE LEAK REPAIRED BEFORE RESUMING OPERATIONS	
Describe where the leak was found, with sufficient accuracy so the same location can be found again. (attach sketches or photos as necessary)	

AKZO Nobel – Moses Lake

 AkzoNobel	Date Issued September 4, 2012	Page No. 1 of 2	Reference PHMSA Part 192.706
ISSUED	Revision # 1	Subject: FORM F-14 Leak Survey & Investigation Report	

Report date: 4.29.15		
If this survey or investigation is the result of third party notification, complete this section:		
Name of person reporting the possible leak: _____		
Address of person reporting the leak: _____		
Name of person performing the survey or investigation: Lind Brigham		
Name and serial number of the instrument (s) used: 181-138524		
Date the instrument was last calibrated: 4.29.15		
Describe the area to be surveyed: V-5601 — V-5602		
Why was the survey performed? (<u>scheduled</u> special, reported leak, other)		
Was gas detected? YES <input type="radio"/> NO <input checked="" type="radio"/> <small>(circle one)</small>	Enter Gas Concentration Here	Time leak was found: _____
Pipeline Manager Signature	Lind Brigham	Date 4.29.15
IF NO LEAK WAS FOUND, THIS REPORT IS COMPLETED AND ONLY THIS PAGE NEED BE RETAINED.		
IF A LEAK IS DISCOVERED THE HYDROGEN PIPELINE IS TO BE SHUT DOWN AND THE LEAK REPAIRED BEFORE RESUMING OPERATIONS		
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AKZO Nobel – Moses Lake

 AkzoNobel	Date Issued September 4, 2012	Page No. 1 of 2	Reference PHMSA Part 192.706
ISSUED	Revision # 1	Subject: FORM F-14 Leak Survey & Investigation Report	

Report date: <u>5-20-2015</u>	
If this survey or investigation is the result of third party notification, complete this section:	
Name of person reporting the possible leak: _____	
Address of person reporting the leak: _____	
Name of person performing the survey or investigation: <u>Lind Bingham</u>	
Name and serial number of the instrument (s) used: <u>181-138526</u>	
Date the instrument was last calibrated: <u>5-20-2015</u>	
Describe the area to be surveyed: <u>V-5601 — V-5602</u>	
Why was the survey performed? (<u>scheduled</u> , special, reported leak, other)	
Was gas detected? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> <small>(circle one)</small>	Enter Gas Concentration Here Time leak was found: _____
Pipeline Manager Signature <u>Lind Bingham</u>	Date <u>5-20-15</u>
IF NO LEAK WAS FOUND, THIS REPORT IS COMPLETED AND ONLY THIS PAGE NEED BE RETAINED.	
IF A LEAK IS DISCOVERED THE HYDROGEN PIPELINE IS TO BE SHUT DOWN AND THE LEAK REPAIRED BEFORE RESUMING OPERATIONS	
Describe where the leak was found, with sufficient accuracy so the same location can be found again. (attach sketches or photos as necessary)	

AKZO Nobel – Moses Lake

 AkzoNobel	Date Issued September 4, 2012	Page No. 1 of 2	Reference PHMSA Part 192.706
ISSUED	Revision # 1	Subject: FORM F-14 Leak Survey & Investigation Report	

Report date: <u>6-15-15</u>		
If this survey or investigation is the result of third party notification, complete this section:		
Name of person reporting the possible leak: _____		
Address of person reporting the leak: _____		
Name of person performing the survey or investigation: <u>Lind Bingham</u>		
Name and serial number of the instrument (s) used: <u>181-138526</u>		
Date the instrument was last calibrated: <u>6-15-15</u>		
Describe the area to be surveyed: <u>V-5601 - V5602</u>		
Why was the survey performed? (<u>scheduled</u> , special, reported leak, other)		
Was gas detected? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> <small>(circle one)</small>	Enter Gas Concentration Here	Time leak was found: _____
Pipeline Manager Signature	<u>Lind Bingham</u>	Date <u>6-15-15</u>
IF NO LEAK WAS FOUND, THIS REPORT IS COMPLETED AND ONLY THIS PAGE NEED BE RETAINED.		
IF A LEAK IS DISCOVERED THE HYDROGEN PIPELINE IS TO BE SHUT DOWN AND THE LEAK REPAIRED BEFORE RESUMING OPERATIONS		
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AKZO Nobel – Moses Lake

 AKZO Nobel	Date Issued September 4, 2012	Page No. 1 of 2	Reference PHMSA Part 192.706
ISSUED	1	Subject: FORM F-14 Leak Survey & Investigation Report	

Report date: August 3, 2015		
If this survey or investigation is the result of third party notification, complete this section:		
Name of person reporting the possible leak: _____		
Address of person reporting the leak: _____		
Name of person performing the survey or investigation: Lind Bingham		
Name and serial number of the instrument (s) used: 181-138526		
Date the instrument was last calibrated: 8-3-15		
Describe the area to be surveyed: V-5601 — V-5602		
Why was the survey performed? (<u>scheduled</u> , special, reported leak, other)		
Was gas detected? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> <small>(circle one)</small>	Enter Gas Concentration Here	Time leak was found: _____
Pipeline Manager Signature Lind Bingham	Date 8-3-15	
IF NO LEAK WAS FOUND, THIS REPORT IS COMPLETED AND ONLY THIS PAGE NEED BE RETAINED.		
IF A LEAK IS DISCOVERED THE HYDROGEN PIPELINE IS TO BE SHUT DOWN AND THE LEAK REPAIRED BEFORE RESUMING OPERATIONS		
Describe where the leak was found, with sufficient accuracy so the same location can be found again. <i>(attach sketches or photos as necessary)</i>		

ATTACHMENT 2

ATTACHMENTS

The Moses Lake Plant manages their training using a program called PC Compliance. On page #1 highlights are two Pipeline trainings being monitored, SHE-059 Pipeline Operator Qualification and SHE-076 Pipeline Drug and Alcohol Signs and Symptoms. Our program is designed to show when retraining is required.

Illustrated on page #2 are the details regarding the frequency of the training and a brief description of the requirements.

AkzoNobel uses a SAP as their maintenance management system. We've created a maintenance plan for the monthly Hydrogen Pipeline Inspection. Page # 3 illustrates that the maintenance plan gets kicked out each month and that the activity is on the hydrogen pipeline.

Page #4 is the plan for what is required to complete the hydrogen pipeline inspection.

#1

SHE-053 COBALT Observer Refresher Training		
SHE-054 Outdoor Heat Exposure		
SHE-055 Incident Reporting / AIR Form		
SHE-059 Pipeline Operator Qualification	DOT	On-site
SHE-060 Crane and Hoist Operations	Safety	On-site
SHE061 Media Crisis Training		
SHE-062 Powered Industrial Equipment		
SHE-063 Accident Investigation		
SHE-064 Back Safety		
SHE-065 Hand Safety		
SHE-066 Ladder Safety		
SHE-067 Office Safety		
SHE-068 NFPA 70E - Electrical Theory and Arc Flash		
SHE069 Compressed Gas Cylinder Safety		
SHE070 Safety and You		

#2

Course Title Individual Training
 Close Category Type CBT Course

Detail Course Cost Check List History Images Documents Notes

Length (Days) Course Style CFR Reference

Total Hours

Maximum Size

Retraining Req. (Months)

Auto Pass Score

Length Description

5 - Before performing Specific Task
 3 - Once Every 3 Calendar Years

One must be trained in pipeline operations prior to performing the task. There are four subjects that are completed: Task # 1 Maintain Key Pipeline Valves & operators, Task # 2, Patrolling,

Written Exam Continuing Education Units

Retraining Description

every 36 months

Course Administration

Disable WebConnect Registration for this Course Course Admin

Supervisor Approval Required

#3



Display Maintenance Plan: Single cycle plan 000000067231

Maintenance plan 67231 Hydrogen Pipeline Inspection

Maint. plan hea...

Maintenance plan cycle Maintenance plan scheduling parameters Maintenance plan additional data M.

Cycle/Unit 1 MON
Cycle text Once per month
Offset/Unit 0 MON

Item Object list item Item location

Maintenance Item 173352 Hydrogen Pipeline Inspection

Reference object

Functional loc. MLE-001-620-PIPE-... CHLORATE HYDROGEN TREATMENT FUNCT L...
Equipment 799506 chlorate hydrogen treatment funct loc -
Assembly

Planning Data

Planning plant 1840 PPCNA - SITE - Moses Lake Maint. Planner Group 010 MLE Planner
Order Type ZM02 Preventive Maintenance MaintActivityType 006 Preventive Mainten...
Main WorkCtr MLE-MECH / 1840 Mechanical Business Area
Priority High: 1-7 Days Settlement Rule
Sales Document /

Task List

Typ Task LstGrp GrpCr Description

#4

Leak Survey & Investigation Report

Purpose: The purpose of this procedure is to define how the leak survey and investigation report is conducted. The report is conducted as compliance to the Pipeline Hazardous Materials Safety Administration (PHMSA).

Scope: This procedure applies to the Moses Lake Hydrogen Pipeline that delivers hydrogen gas to JR Simplot.

Safety: Use PPE when walking the Pipeline. No flammable while walking the pipeline.

Responsible: The Moses Lake Pipeline Operators are responsible for conducting the leak survey & investigation.

Procedure: Obtain Form F-14 from the HSE&S Managers file cabinet. The form is located in the top draw left hand side.

Obtain the Qrae II hand held monitor serial # 181-138526 and associated tubing adaptor from the HSE&S Managers office.

Complete a fresh air calibration for the Qrae II monitor or pump test the monitor in the BC Control room , or have an I&E Tech calibrate the unit.

Once the unit has been calibrated start the survey. The pipeline begins at V-5601. You start at the valve using the sampling wand and walk the line following the pipeline markers to fence line at the north end of the property.

Contact JR Simplot by calling 509-765-3443 and advise them that you need to complete the leak survey.

Start outside the north fence surveying until having to access JR Simplot man gate. Meet the JR Simplot representative