



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

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CERTIFIED MAIL

October 27, 2015

Jimmy Jordan
Corporate HSE Manager
Akzo Nobel Pulp and Performance Chemicals
4374 Nashville Ferry Road East
Columbus, MS 39702

Dear Mr. Jordan:

**RE: 2015 Hydrogen Standard Inspection – Akzo Nobel Pulp and Performance Chemicals
– Moses Lake – (Insp. No. 6198)**

Staff from the Washington Utilities and Transportation Commission (staff) conducted a hydrogen gas Standard, Operator Qualification (OQ), and Public Awareness (PA) inspection on September 15 and 16, 2015, of Akzo Nobel Pulp and Performance Chemicals – Moses Lake. The inspection included records review and inspection of the pipeline facilities.

Our inspection indicates two probable violation(s) as noted in the enclosed report.

Your response needed

Please review the attached report and respond in writing by November 30, 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.

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 Dave Cullom at (360) 664-1141. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,



Alan E. Rathbun
Pipeline Safety Director

Enclosure

cc: Calvin Greene, Plant Manager, Akzo Nobel Pulp and Performance Chemicals
Robert L. Cosentino, Principal Consultant, Cosentino Consulting

UTILITIES AND TRANSPORTATION COMMISSION
2015 Hydrogen Gas Pipeline Safety Standard Inspection
Akzo Nobel Pulp and Performance Chemicals, Moses Lake, WA

The following probable violation(s) of WAC 480-93 were noted as a result of the 2015 inspection of the Akzo Nobel Pulp and Performance Chemicals - Moses Lake, WA pipeline system. The inspection included a random selection of records, operation and maintenance (O&M) procedures, emergency response, drug and alcohol program, public awareness program, operator qualification program, and a field inspection of the pipeline facilities.

PROBABLE VIOLATIONS

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(s):

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.

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):

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.