



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY (360) 586-8203

CERTIFIED MAIL

August 3, 2015

Andy Bateman
Plant Manager
Lamb Weston/BSW
1203 Basin Street
Warden, WA 98857

Dear Mr. Bateman:

RE: 2015 Natural Gas Standard Inspection – Lamb Weston/BSW (Insp. No. 6219)

Staff from the Washington Utilities and Transportation Commission (staff) conducted a standard inspection from May 19 - 20, 2015, of Lamb Weston/BSW. The inspection included a records review and inspection of the pipeline facilities.

Our inspection indicates five probable violations as noted in the enclosed report, 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 September 4, 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.

Lamb Weston/BSW
2015 Natural Gas Standard Inspection
August 3, 2015
Page 2

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 Anthony Dorrough at (360) 664-1318. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alan E. Rathbun", with a long horizontal flourish extending to the right.

Alan E. Rathbun
Pipeline Safety Director

Enclosure

UTILITIES AND TRANSPORTATION COMMISSION
2015 Natural Gas Pipeline Safety Standard Inspection
Lamb Weston/BSW

The following probable violations of Title 49 CFR Part 192 and WAC 480-93 were noted as a result of the 2015 inspection of Lamb Weston/BSW (Lamb Weston). The inspection included a random selection of records, operation and maintenance (O&M), emergency response, inventory, and field inspection of the pipeline facilities.

PROBABLE VIOLATIONS

1. WAC 480-93-110 Corrosion Control

- (2) *Each gas pipeline company must complete remedial action within ninety days to correct any cathodic protection deficiencies known and indicated by any test, survey, or inspection. An additional thirty days may be allowed for remedial action if due to circumstances beyond the gas pipeline company's control the company cannot complete remedial action within ninety days. Each gas pipeline company must be able to provide documentation to the commission indicating that remedial action was started in a timely manner and that all efforts were made to complete remedial action within ninety days. (Examples of circumstances allowing each gas pipeline company to exceed the ninety-day time frame include right-of-way permitting issues, availability of repair materials, or unusually long investigation or repair requirements).*

Finding(s):

A records review of Lamb Weston's "Cathodic Protection Survey" (dated 02/12/15) revealed a cathodic protection (CP) read of -0.241 VDC, below Lamb Weston's protective criteria established at -0.850 VDC. Lamb Weston could not document that remedial action was taken within ninety days as required by code.

2. 49 CFR §192.614 Damage Prevention Program

- (c) *The damage prevention program required by paragraph (a) of this section must, at a minimum:*
- (6) *Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:*
- (i) *The inspection must be done frequently as necessary during and after the activities to verify the integrity of the pipeline;*

Finding(s):

A review of Lamb Weston's One-Call records showed that there was an incidence where excavation activity took place within 35-feet of underground facilities. When asked by staff, Lamb Weston could not provide documentation that a follow-up inspection had occurred at that location to verify the integrity of the pipeline.

3. **49 CFR §192.463 External Corrosion Control: Cathodic Protection**
(a) *Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in Appendix D of this part. If none of this criteria is applicable, the cathodic protection system must provide a level of cathodic protection at least equal to that provided by compliance with one or more of these criteria.*

Finding(s):

During the field verification portion of the inspection, a CP read of -0.198 VDC, below Lamb Weston's protective criteria established at -0.850 VDC was recorded at test station #12. Lamb Weston failed to provide a level of cathodic protection required by the code.

4. **WAC 480-93-170 Tests and Reports for Gas Pipelines**
(10) *Pressure testing equipment must be maintained, tested for accuracy, or calibrated, in accordance with the manufacturer's recommendations. When there are no manufacturer's recommendations, then pressure testing equipment must be tested for accuracy at an appropriate schedule determined by the gas pipeline company. Test equipment must be tagged with the calibration or accuracy check expiration date. The requirements of this section also apply to equipment such as pressure charts, gauges, dead weights or other devices used to test, monitor or check system pressures or set-points.*

Finding(s):

Operations records indicate that Lamb Weston's pressure testing equipment and instrumentation is regularly calibrated on a set schedule. Pressure testing must always be performed with calibrated equipment. During the field verification portion of the inspection, Northwest Metal Fab personnel did not have calibrated gauges on hand to perform lock-up and stroke testing and performed the testing with non-calibrated equipment.

5. **49 CFR §192.805 Qualification Program**
Each operator shall have and follow a written qualification program. The program shall include provisions to:
(b) *Ensure through evaluation that individuals performing covered tasks are qualified;*

Finding(s):

NW Metal Fab personnel were not cognizant of the Abnormal Operating Condition (AOC) associated with a low CP read at a CP survey test site where there were obvious physical signs that the pipeline may have suffered excavation damage.