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November 4, 2016

Alan Rathbun- Director of Pipeline Safety Program  
State of Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
P.O. Box 47250  
Olympia, WA 98504-7250

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Pipeline Safety Program

Subject: Response to 2016 Natural Gas Standard Inspection – Walla Walla District (Insp. No. 6777)

Dear Mr. Rathbun,

This letter is intended to address the probable safety code violations. Specifically, we are addressing how we have brought the probable violations into full compliance. The inspection was conducted from August 1-4, 2016 in Walla Walla, Washington.

### **PROBABLE VIOLATION**

**1. 49 CFR §192.723 Distribution systems: Leakage surveys**

- (b) *The type and scope of the leakage control program must be determined by the nature of the operations and the local conditions, but it must meet the following minimum requirements:*
- (1) *A leakage survey with leak detector equipment must be conducted in business districts, including tests of the atmosphere in gas, electric telephone, sewer, and water system manholes, at cracks in pavement and sidewalks, and at other locations providing an opportunity for finding gas leaks, at intervals not exceeding 15 months, but at least once each calendar year.*

**Finding(s):**

CNG's leak survey maps indicate that leak surveys for the following business district pipeline facilities exceeded 15 months between surveys and that they were not conducted once each calendar year as required:

- a. 403 10<sup>th</sup> Ave S, Walla Walla. Surveyed on 4/28/14 and again on 7/6/2016.
- b. 501 S. 7<sup>th</sup> Ave, Walla Walla. Surveyed on 4/28/14 and again on 7/6/2016.
- c. 164 S. 7<sup>th</sup> Ave, Walla Walla. Surveyed on 4/28/14 and again on 7/6/2016.
- d. 405 W. Main St, Walla Walla. Surveyed on 4/28/14 and again on 7/6/2016.
- e. 420 W. Main St, Walla Walla. Surveyed on 4/28/14 and again on 7/6/2016.
- f. 401 W. Main St, Walla Walla. Surveyed on 4/28/14 and again on 7/6/2016.
- g. 223 W. Poplar St, Walla Walla. Surveyed on 4/28/14 and again on 7/6/2016.
- h. 228 W. Poplar St, Walla Walla. Surveyed on 4/28/14 and again on 7/6/2016.
- i. 216 W. Poplar St, Walla Walla. Surveyed on 4/28/14 and again on 7/6/2016.
- j. 209 W. Poplar St, Walla Walla. Surveyed on 4/28/14 and again on 7/6/2016.

**Note:**

It was not determined at the time of this inspection whether this was a record keeping issue or whether the surveys were actually not completed.

**Cascade Response**

CNGC identified the lines listed above during an internal audit of leak survey records on June 17, 2016. We are confident this is a documentation error and that these facilities were, in fact, surveyed within the required time frame. Nonetheless, a special leak survey was performed on July 6, 2016 and confirmed no leaks at these locations.

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## **2. 49 CFR §192.723 Distribution systems: Leakage surveys**

- (b) *The type and scope of the leakage control program must be determined by the nature of the operations and the local conditions, but it must meet the following minimum requirements:*
- (2) *A leakage survey with leak detector equipment must be conducted outside business districts as frequently as necessary, but at least once every 5 calendar years at intervals not exceeding 63 months...*

### **Finding(s):**

CNG's leak survey maps indicate that leak surveys for the following residential area pipeline facilities exceeded 63 months between surveys and that they were not conducted once every 5 calendar years as required:

- a. **613 E. Pleasant St, Walla Walla**, Surveyed on 5/27/2009 and again on 7/6/2016. (No 2009 maps available, records indicate this was the last survey date)
- b. **404 S. 2<sup>nd</sup> Ave, Walla Walla**, Surveyed on 5/27/2009 and again on 7/6/2016. (No 2009 maps available, records indicate this was the last survey date)
- c. **410 S. 2<sup>nd</sup> Ave, Walla Walla**, Surveyed on 5/27/2009 and again on 7/6/2016. (No 2009 maps available, records indicate this was the last survey date)
- d. **353 S. Park St, Walla Walla**, Surveyed on 5/27/2009 and again on 7/6/2016. (No 2009 maps available, records indicate this was the last survey date)
- e. **521 S. Park St, Walla Walla**, Surveyed on 5/27/2009 and again on 7/6/2016. (No 2009 maps available, records indicate this was the last survey date)
- f. **523 S. Park St, Walla Walla**, Surveyed on 5/27/2009 and again on 7/6/2016. (No 2009 maps available, records indicate this was the last survey date)
- g. **514 S. Washington St, Walla Walla**, Surveyed on 5/27/2009 and again on 7/6/2016. (No 2009 maps available, records indicate this was the last survey date)
- h. **365 Ransom Rd, Walla Walla**, Surveyed on 5/27/2009 and again on 7/6/2016. (No 2009 maps available, records indicate this was the last survey date)
- i. **467 Ransom Rd, Walla Walla**, Surveyed on 5/27/2009 and again on 7/6/2016. (No 2009 maps available, records indicate this was the last survey date)
- j. **416 Chase St, Walla Walla**, Surveyed on 4/07/2009 and again on 7/6/2016. (04/07/2016 date supplied by CNG per email on 8/26/16)
- k. **439 Chase St, Walla Walla**, Surveyed on 4/07/2009 and again on 7/6/2016. (04/07/2016 date supplied by CNG per email on 8/26/16)
- l. **260 Chase St, Walla Walla**, Surveyed on 4/07/2009 and again on 7/6/2016. (04/07/2016 date supplied by CNG per email on 8/26/16)
- m. **448 Chase St, Walla Walla**, Surveyed on 4/07/2009 and again on 7/6/2016. (04/07/2016 date supplied by CNG per email on 8/26/16)

### **Note:**

It was not determined at the time of this inspection whether this was a record keeping issue or whether the surveys were actually not completed.

## **Cascade Response**

CNGC identified the lines above during an internal audit of leak survey records on June 17, 2016. We are confident this is a documentation error and that these facilities were, in fact, surveyed within the required time frame. Nonetheless, a special leak survey was performed on July 6, 2016 and confirmed no leaks at these locations.

## **3. WAC 480-93-188 Gas Leak surveys**

- (4) *Each gas pipeline company must conduct special leak surveys under the following circumstances:*
- (e) *After third-party excavation damage to services, each gas pipeline company must perform a gas leak survey from the point of damage to the service tie-in.*

### **Finding(s):**

CNG Leak Work Order 209555, locates at 267 Whistling Duck in Walla Walla, indicates that a leak repair was made on 03/04/14 after third party excavation damage. The leak work order does not indicate that a gas leak Survey was conducted from the point of damage to the service tie-in.

## **Cascade Response**

CNGC conducted a leak investigation at 267 Whistling Duck on August 4, 2016 and identified foreign source readings in the area. CNGC conducted an additional leak investigation on October 14, 2016 which confirmed no leaks on CNGC pipeline at this address. CNGC has performed training with this individual.

**4. WAC 480-93-188 Gas Leak surveys**

- (3) *Each gas pipeline company must conduct gas leak surveys according to the following minimum frequencies:*  
(b) *High occupancy structures or areas- At least once annually, but not to exceed fifteen months between surveys.*

**Finding(s):**

Records indicate that the service to a High Occupancy Structure (HOS) located at 901 SE Larch Ave in College Place was leak surveyed on 05/08/2015 but the right-of-way in front of the HOS was not included in the survey. This HOS including the right-of-way was surveyed in 2014 and 2016.

**Note:**

As was noted in the findings of the 2011 Walla Walla inspection Docket PG-110006, it is the intent of WAC 480-93-188(3)(b) to include any facilities in the surrounding rights of way during a HOS gas leak survey.

**Cascade Response**

CNGC review of the leak survey map determined the main line, in the right-of-way, adjacent to the address was not properly identified on the map as being required for this survey. CNGC will correct this mapping error. CNGC is conducting additional review of Walla Walla district leak survey maps to verify main line in the right-of-way adjacent to HOS/A locations are adequately identified.

**5. 49 CFR §192.619 Maximum allowable operating pressure – Steel or plastic pipelines**

- (a) *No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum allowable operating pressure determined under paragraph (c) or (d) of this section, or the lowest of the following:*  
(3) *The highest actual operating pressure to which the segment was subjected during the 5 years preceding the applicable date in the second column. This pressure restriction applies unless the segment was tested according to the requirement in paragraph (a)(2) of this section after the applicable date in the third column or the segment was uprated according to the requirements in subpart K of this part:*

<i>Pipeline Segment</i>	<i>Pressure Date</i>	<i>Test Date</i>
<i>All other pipelines</i>	<i>July 1, 1970</i>	<i>July 1, 1965</i>

**Finding(s):**

CNG has a coated 2-inch steel main located at Spring and Maple in Walla Walla that the records indicate was installed in November of 1956. CNG does not have pressure test records for this pipeline. CNG indicated that this pipeline operated at a high of 38 psig in the 5 year window prior to July 1, 1970. CNG indicated that this pipeline was uprated to 60 psig in late 1996 or early 1997 but was unable to provide uprate records that would substantiate a 60 psig MAOP.

With no pressure test or uprate records and per the requirements for 49 CFR 192.619, this pipeline would have an MAOP of 38 psig. At the time of this inspection the pipeline was operating at approximately 57 psig.

**Cascade Response**

Due to the lack of pressure test records and discovery of "high-5" documents establishing MAOP of 38 psig, CNGC provided notification to the WUTC on 09/26/16 that it was lowering the Walla Walla system to 38 psig. CNGC is in the process of performing all necessary steps to uprate this system per code.

Please contact Mike Eutsey at (509) 734-4576 with questions or comments.

Respectfully Submitted,



Eric Martuscelli  
Vice President, Operations  
Cascade Natural Gas Corporation