



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

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Via Email and FedEx

December 10, 2015

Zach Barrett
Director, State Programs
Office of Pipeline Safety
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
3700 S. MacArthur Blvd, Suite B
Oklahoma City, OK 73179-7612

Dear Mr. Barrett:

RE: Washington State Pipeline Safety Program - Response to Nov. 4, 2015 Letter

Thank you for your letter dated Nov. 4, 2015. I appreciate the opportunity to update the Pipeline and Hazardous Materials Safety Administration (PHMSA) about various aspects of Washington Utilities and Transportation Commission's (UTC) pipeline safety program.

Below is our response to the two issues (item numbers 3 and 4) you listed:

1. **The UTC claimed zero compliance actions on Attachment 5 of both the natural gas and hazardous liquid program's progress report. Upon review of the records the UTC had actually sent out 12 compliance action letters to natural gas operators and two compliance action letters to hazardous liquid letters in CY 2014.**

The commission acknowledges that staff listed no compliance actions for the year 2014, even though 14 letters were issued highlighting compliance concerns. Historically, the commission has viewed these as documentation that identifies probable violations based on our inspection findings. These findings do not constitute a formal compliance action unless it is confirmed by the commissioners. Generally, such actions result in an order by the commissioners. Because none of these probable violations recorded during 2014 resulted in a commission order, they are not interpreted as compliance actions.

The commission has no concern with listing such letters as compliance actions in attachment 5 of the progress report and will do so in all future progress reports to PHMSA.

Respect. Professionalism. Integrity. Accountability.

2. **The UTC failed to verify that all inspectors obtained the minimum qualifications to lead applicable inspections.**

Commission staff acknowledges that an inspector was assigned as lead on several gas inspections prior to completion of all the Training and Qualifications (TQ) required training. The commission's inspector training practice require that a new inspector accompany a senior inspector for the first year or two, depending on their rate of development. Until a new inspector passed the required TQ training, the new inspector was occasionally designated as lead on certain cases; however, that inspector was also generally accompanied by a senior inspector. Historically, until the required TQ training is completed, new inspectors are not performing standard inspections unless they are accompanied by a senior engineer. From a professional development perspective, commission staff believe each inspector needs to develop experience leading an inspection with a senior inspector as an observer. This better ensures that a new inspector can adequately perform the work prior to working independently. The commission acknowledges this PHMSA requirement and in the future, no inspector will be designated as lead until their TQ requirements are met.

Thank you, and Michael Thompson, for your professionalism and courtesy throughout the audit. If you have questions about this letter or other pipeline safety matters, please contact me directly at (360) 664-1208 or ddanner@utc.wa.gov. You may also contact Alan Rathbun, Director of Pipeline Safety at (360) 664-1219 or arathbun@utc.wa.gov.

Sincerely,



David W. Danner
Chairman

cc: Michael Thompson, PHMSA PHP-50
Chris Hoidal, Western Region Director, PHMSA PHP-500
Alan E. Rathbun, Director, UTC Pipeline Safety Program