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WASH. UT. & TP. COMM

AkzoNobel
Tomorrow's Answers Today

re: 2012 Hydrogen Gas Pipeline Safety Inspection – Akzo Nobel, Moses Lake, WA

David Lykken
Pipeline Safety Director
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
Olympia WA, 98504-7250

Dear Mr. Lykken:

Please find attached the Akzo Nobel response to the 2012 Hydrogen Gas Pipeline Safety Inspection – Akzo Nobel, Moses Lake, WA.

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

Sincerely,

Calvin Greene
Facility Manager
Akzo Nobel, Moses Lake

cc Cosentino Consulting Inc.
Pipeline facility files

**Response to 2012 Hydrogen Gas Pipeline Safety Inspection
Akzo Nobel, Moses Lake, WA**

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 operator did not leak survey the unodorized hydrogen pipeline monthly as required. They erroneously were surveying twice per year. The operator is not odorizing the pipeline as it makes the gas "unfit for its intended purpose" per WAC 480-93-015(6). The gas is used as portion of a three part feedstock for a boiler at Simplot.


Response:

Akzo Nobel will conduct leak surveys monthly as required by WAC 480-93-188. Appendix E of the O&M manual will be modified as shown on the attachment. The modified language is highlighted for your convenience.

The revised Appendix E will be incorporated into the issued O&M manual during the annual manual review which occurs in January 2013.

A revised O&M manual will be issued to the WUTC in January 2013 as evidence of the modified appendix E.

AKZO NOBEL – MOSES LAKE

 AkzoNobel	Date Issued -	Page No. 1 of 18	Reference 49 CFR Part 192.605
DRAFT	1b	Subject: OPERATIONS AND MAINTENANCE MANUAL	

Revision History			
Rev #	Description	Issue Date	Originator
0	Initial issue	October 10, 2008	CCI
1	Revision Section 9 to Reflect Current PHMSA Reporting Procedures, Added Procedure P-33, Revised Procedure F-14	September 12, 2012	CCI
1a	Revised Section 2 and Appendix D to reflect actual MOP capabilities of the pipeline	October 16, 2012	CCI
1b	Revised Appendix E schedule to increase leak survey frequency to monthly.	Draft	CCI

Document Originator:

Cosentino Consulting Inc.

Approval for Issuance:


Signature

(on file)

Date

(on file)

AKZO NOBEL – MOSES LAKE

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APPENDIX E – FORMS

Report forms listed below shall be completed according to the frequency listed below.

FORM		FREQUENCY	
F-1	Emergency Checklist	As needed	
F-2	Abnormal Operating Condition Report	As needed	
F-3	Reserved		
F-4	Valve Inspection Form	once each calendar year, at intervals not exceeding 15-months	
F-5	RESERVED		
F-6	RESERVED		
F-7	RESERVED		
F-8	Transmission System Incident Report	As needed	
F-9	Transmission System Annual Report	Annually, by March 15	
F-10	Atmospheric Corrosion Inspection	once each calendar year, at intervals not exceeding 15-months	
F-11	Hydrostatic Test Report	As needed	
F-12	RESERVED		
F-13	RESERVED		
F-14	Leak Survey & Investigation Report	Monthly	
F-15	Line Locate Request	As needed	
F-16	RESERVED		
F-17	Pipeline Patrol Report	As in table below	
<u>Class Location</u>		<u>Highway and Railroad Crossing</u>	<u>All Other Places</u>
1,2		Twice annually, 7-1/2 mo. max. interval.	Annually, 15 month maximum interval.
F-18	RESERVED		
F-19	RESERVED		
F-20	RESERVED		
F-21	RESERVED		
F-22	RESERVED		
F-23	RESERVED		
F-24	Hot Tap Check List	As needed	
F-25	Safety Related Condition Reports	As needed	
F-26	WUTC 2 Hour Report & 30 Day Follow-up	As needed	
F-27	WUTC 24 Hour Report	As needed	
F-28	WUTC 45 Day Report	As needed	
F-29	WUTC Annual Report	As needed	
F-30	WUTC Operator Contact Report	As changes in Operators personnel occur by plant	
F-31	Documentation of Integrity & Construction Defect Repairs	As needed	