



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

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Sent Via Email and FedEx

August 26, 2019

Heather Rosentrater
Senior Vice President, Energy Delivery
Avista Utilities Corporation
1411 East Mission
PO Box 3727
Spokane, WA 99220-3727

RE: 2019 Natural Gas Standard Inspection – Avista Utilities, Ritzville/Goldendale – (Insp. No. 7780)

Dear Ms. Rosentrater:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Standard Natural Gas inspection between July 30 – 31 and August 13 – 14, 2019. The inspection included a records review and inspection of certain pipeline facilities.

Our inspection indicates one probable violation as noted in the enclosed report. We also noted two areas of concern, which unless corrected, could potentially lead to future violation(s) of state and/or federal pipeline safety rules.

Your response needed

Please review the attached report and respond in writing by September 27. The response should include how Avista plans to prevent a similar probable violation in the future and how you plan on addressing the areas of concern.

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 81.04.405; or

- Issue a complaint under RCW 81.88.040, seeking monetary penalties, changes in the company's practices, or other relief authorized by law, and justified by the circumstances. Any pipeline company that violates any pipeline safety provision of any commission order, or any rule in this chapter including those rules adopted by reference, or chapter [81.88](#) RCW is subject to a civil penalty not to exceed two hundred thousand dollars for each violation for each day that the violation persists. The maximum civil penalty for a related series of violations is two million dollars; or
- Consider the matter resolved without further commission action.

We have not yet decided whether to pursue a penalty or complaint in this matter. Should the commission decide to assess a penalty or initiate a complaint, your company will have an opportunity to respond and formally present its position.

If you have any questions or if we may be of any assistance, please contact Scott Rukke at (360) 870-4923. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,



Sean C. Mayo
Pipeline Safety Director

cc: Mike Faulkenberry, Director of Natural Gas
Karen Cash, Manager, Integrity Management and Compliance
Paul Good, Coeur d'Alene Operations Manager
Randy Bareither, Pipeline Safety Engineer

UTILITIES AND TRANSPORTATION COMMISSION
2019 Natural Gas Standard Inspection, Avista Utilities, Ritzville/Goldendale No. 7780

The following probable violation(s) and areas of concern of WAC 480-93 and Title 49 CFR Part 192 were noted as a result of the 2019 Natural Gas Standard Inspection of Avista Utilities' (Avista) Ritzville/Goldendale Unit inspection. The inspection included a records review and a field inspection of certain pipeline facilities.

PROBABLE VIOLATION

1. **WAC 480-93-186(3), Leak evaluation.**
(3) The gas pipeline company must check the perimeter of the leak area with a combustible gas indicator. The gas pipeline company must perform a follow-up inspection on all leak repairs with residual gas remaining in the ground as soon as practical, but not later than thirty days following the repair.

Findings:

Records indicate that on August 8, 2017, Avista repaired a leak at 114 NW McKinley St #B in Stevenson WA. A residual gas in air reading of 2.9% was left in the ground after the repair. Any residual gas readings left after a leak repair requires that a follow-up inspection be conducted within 30 days. Records indicate that Avista did not conduct a follow up until September 21, 2017. This did not meet the 30 day follow-up inspection requirement.

AREAS OF CONCERN

1. **WAC 480-93-018(4), Records.**
(4) Each gas pipeline company must record and maintain records of the actual value of any required reads, tests, surveys or inspections performed.....

Findings:

WAC 480-93-140 requires regulator set pressures to be tested each time a regulator is installed. Records indicated that some regulator lock-up pressures were recorded in pounds per square inch gauge (PSIG) when the pressures were actually set at inches water column. The electronic form that the lock-up pressures are recorded on does not appear to allow the pressures to be recorded in inches water column. Avista should modify their electronic form to allow the accurate recording of regulator set pressures.

2. **49 CFR § 192.229(c)(1) - Limitations on welders and welding operators.**
*(c) A welder or welding operator qualified under § 192.227(a) -
(1)welders or welding operators may maintain an ongoing qualification status by performing welds tested and found acceptable under the above acceptance criteria at least twice each calendar year, but at intervals not exceeding 7 1/2 months.....*

Findings:

When Avista qualifies their welders they record the information on a Welder Qualification Test Report (WQTR), form N-2562 09-15. The WQTR records information such as the essential variables, test results and the date(s) the tests were performed. In addition, Avista has an internal date tracking form to assist in determining when future qualifications are due. A review of both records indicated that the internal date tracking form did not always record the actual date the welders were qualified and instead used the dates the welder qualification tests were due. If a welder is qualified earlier than the due date this could lead to their next qualification test exceeding the maximum 7 1/2 month timeframe.

A review of Avista's WQTR forms indicates that no welders exceeded the maximum timeframe for requalification.