



STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

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*Sent via email*

March 31, 2021

Kevin Rasler  
President  
Inland Empire Paper Company  
3320 N. Argonne Road  
Milwood, WA 99212

**RE: 2021 Natural Gas Standard Inspection – Inland Empire Paper Company – (Insp. No. 8268)**

Dear Mr. Rasler:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Standard Inspection of Inland Empire Paper Company (Inland Empire) from March 22, 2021 to March 23, 2021. This inspection included a records review and inspection of the pipeline facilities. Our inspection indicates two probable violations as noted in the enclosed report.

**Your response needed**

Please review the attached report and respond in writing by May 3, 2021. 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 81.04.405](#); 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 \$222,504 for each violation for

each day that the violation persists. The maximum civil penalty for a related series of violations is \$2,225,034; 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 Derek Norwood at (360) 259-2525. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

Sean C. Mayo  
Pipeline Safety Director

cc: Doug Krapas, Environmental Manager, Inland  
Kevin Davis, Production Manager, Inland  
Tony Ventresco, Human Resources Manager, Inland

**UTILITIES AND TRANSPORTATION COMMISSION**  
**2021 Natural Gas Pipeline Safety Inspection**  
**Inland Empire Paper Company**

The following probable violations of Title 49 CFR Part 192 were noted as a result of the 2020 inspection of the Inland Empire Paper Company. The inspection included a random selection of records, operations and maintenance tasks and field inspection of the pipeline facilities.

**PROBABLE VIOLATIONS**

1. **49 CFR §192.805(b) 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):**

Inland Empire's process does not specify the evaluation and qualification requirements for supervisors and managers who perform covered tasks. The process must include qualification procedures for all personnel who perform covered tasks. The qualification process must show that an individual can perform the task and react to abnormal operating conditions.

2. **49 CFR §192.805(g) Qualification program.**

*Each operator shall have and follow a written qualification program. The program shall include provisions to:*

*(g) Identify those covered tasks and the intervals at which evaluation of the individual's qualifications is needed*

**Finding(s):**

Inland Empire has specified a 3-year re-qualification interval for Inland Empire employees performing covered tasks. One individual was due for re-qualification in 2020 and at the time of the commission inspection, the employee had not been re-qualified.