

Thank you for your prompt response. I need to address a few things which require greater detail. Please review staff's response below and explain how you will bring these issues into compliance within [15] days of the date of this email. Feel free to contact me if you need to discuss or get further clarification.

In general, staff is looking for a response to how Ferrellgas/Pacific Seafoods (Ferrellgas) will bring these probable violations into compliance. The following responses do not adequately describe this process. Staff is looking for a brief explanation how Ferrellgas plans to meet the requirement in the future or to be shown how Ferrellgas currently meets the requirement.

1. **49 CFR §192.481 Atmospheric corrosion control: Monitoring**

(a) Each operator must inspect and evaluate each pipeline or portion of the pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:

<i>Pipeline type:</i>	<i>Then the frequency of inspection is:</i>
<i>(1) Onshore other than a Service Line</i>	<i>At least once every 3 calendar years, but with intervals not exceeding 39 months.</i>
<i>(2) Onshore Service Line</i>	<i>At least once every 5 calendar years, but with intervals not exceeding 63 months, except as provided in <u>paragraph (d)</u> of this section.</i>
<i>(3) Offshore</i>	<i>At least once each calendar year, but with intervals not exceeding 15 months.</i>

(b) During inspections the operator must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water.

(c) If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by § 192.479.

(d) If atmospheric corrosion is found on a service line during the most recent inspection, then the next inspection of that pipeline or portion of pipeline must be within 3 calendar years, but with intervals not exceeding 39 months.

Finding(s):

Ferrellgas did not provide staff any procedure, documentation or records to support any atmospheric corrosion control monitoring for this pipeline system.

Ferrellgas Response: The atmospheric corrosion control monitoring procedures are outlined within our Operations and Maintenance pipeline manual pages 51 – 54. Documentation is completed on the atmospheric corrosion control inspection form, retained in the manual. I have attached a PDF of our Operations and Maintenance Pipeline Manual (2021 Update) for reference.

UTC: The procedures are outlined in the Ferrellgas O&M manual but not in the site specific O&M manual.

FG: The Site-Specific Operation & Maintenance Manual will be placed in the same binder as the O & M. Each binder is customer for the specific site. I have attached a photo of the JS binder or Coast Seafood.

6. **49 CFR §192.615(b)(3) Emergency plans**

(b) Each operator shall:

(3) Review employee activities to determine whether the procedures were effectively followed in each emergency.

Finding(s):

Ferrellgas did not provide staff with any documentation or records to support that procedures are in place specific to this pipeline system that would allow them to review employee activities after an emergency.

Ferrellgas Response: All Ferrellgas employees who operate this system have been properly trained with a completed Skills assessment before signing off to operate the system. I provided a copy of our employee's completed training after the inspection.

UTC: This procedure needs to be added to the O&M-Site Specific manual.

FG: The Site-Specific Operation & Maintenance Manual will be placed in the same binder as the O & M. Each binder is customer for the specific site. I have attached a photo of the JS binder or Coast Seafood

9. **49 CFR §192.707 Line markers for mains and transmission lines**

(a) Buried pipelines. Except as provided in paragraph (b) of this section, a line marker must be placed and maintained as close as practical over each buried main and transmission line:

(1) At each crossing of a public road and railroad; and

(2) Wherever necessary to identify the location of the transmission line or main to reduce the possibility of damage or interference.

(b) Exceptions for buried pipelines. Line markers are not required for the following pipelines:

(1) Mains and transmission lines located offshore, or at crossings of or under

waterways and other bodies of water.

(2) [Mains](#) in Class 3 or Class 4 locations where a damage prevention program is in effect under [§ 192.614](#).

(3) *Transmission lines* in Class 3 or 4 locations until March 20, 1996.

(4) *Transmission lines* in Class 3 or 4 locations where placement of a line marker is impractical.

(c) Pipelines aboveground. *Line markers must be placed and maintained along each section of a main and transmission line that is located aboveground in an area accessible to the public.*

(d) Marker warning. *The following must be written legibly on a background of sharply contrasting color on each line marker:*

(1) *The word "Warning," "Caution," or "Danger" followed by the words "Gas (or name of gas transported) Pipeline" all of which, except for markers in heavily developed urban areas, must be in letters at least 1 inch (25 millimeters) high with 1/4 inch (6.4 millimeters) stroke.*

(2) *The name of the operator and the telephone number (including area code) where the operator can be reached at all times.*

Finding(s):

Ferrellgas did not provide staff with any documentation or records to support that they have a procedure for placement or maintenance of line markers specific to this pipeline system.

Ferrellgas Response: The procedures for placing and maintaining line markers is outlined in the Operations & Maintenance Manual on page 86. The line parkers were pointed out during the on-site inspection.

Line markers [192.707]

Install a line marker complying with at each place a main line crosses a public road or railway, comes above grade, any other place that may be required by the Authority Having Jurisdiction.

- The words "Warning", "Caution", or "Danger", Gas (or Propane) Pipeline on a contrasting background.
- Minimum letter size is 1 inch high with ¼ inch wide elements.
- The name and telephone number (including area code) where the operator can be reached at all times.
- Pipelines where Ferrellgas is the operator may use the Ferrellgas system decal 4040A imprinted with the Service Center telephone number.
- Line markers may not be required in certain highly populated areas of cities and towns. Contact the Office of Pipeline Safety for more information.
- Obtain line markers from wholesale propane equipment suppliers.
- A pipeline marker Item 4041 may be ordered from Data Source.

UTC: These procedures need to be in the O&M-Site Specific manual.

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10. **49 CFR §192.747 Valve maintenance: Distribution systems**

(a) *Each valve, the use of which may be necessary for the safe operation of a distribution system, must be checked and serviced at intervals not exceeding 15 months, but at least once each calendar year.*

(b) *Each operator must take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternative valve.*

Finding(s):

Ferrellgas did not provide staff with any procedure, documentation or records to support that valves located on the pipeline are checked or serviced or that there is a plan for how to handle inoperable valves specific to this pipeline system.

Ferrellgas Response: Procedures for valves' inspection and maintenance are found in the Operations & Maintenance Manual pages 55-56. Key valve inspection reports are maintained in the Pacific Seafoods JS binder. Refer to attached Operations & Maintenance Manual.

UTC: These procedures need to be in the O&M-Site Specific manual.

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11. **WAC 480-93-013 Covered tasks**

*(1) Background. 49 C.F.R. §§ 192.803 through 192.809 prescribe the requirements associated with qualifications for gas pipeline company personnel to perform "covered tasks." 49 C.F.R. § 192.801 contains a definition of "covered task." In WAC **480-93-999**, the commission adopts 49 C.F.R. §§ 192.801 through 192.809. However, in this section,*

the commission includes "new construction" in the definition of "covered task."

(2) Accordingly, for the purpose of this chapter, the commission defines a covered task that will be subject to the requirements of 49 C.F.R. §§ 192.803 through 192.809 as an activity, identified by the gas pipeline company, that:

(a) Is performed on a gas pipeline;

(b) Is an operations, maintenance, or new construction task; (c) Is performed as a requirement of Part 192

C.F.R.; and

(d) Affects the operation or integrity of the gas pipeline.

(3) In all other respects, the requirements of 49 C.F.R. §§ 192.801 through 192.809 apply to this chapter.

(4) The equipment and facilities used by a gas pipeline company for training and qualification of employees must be similar to the equipment and facilities on which the employee will perform the covered task.

Finding(s):

Ferrellgas did not provide staff with any procedure, documentation or records to support that have established or developed any covered tasks or trained or qualified individuals to perform any of the covered tasks specific to this pipeline system.

Ferrellgas Response: All Ferrellgas employees who work on JS systems are trained and complete a written examination and proficiency evaluation. All training and Evaluation documentation for Jake Gould was emailed to Anthony Dorrrough on the day of the onsite inspection.

UTC: This procedure needs to be added to the O&M-Site Specific manual.

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12. **WAC 480-93-015(1) Odorization of gas**

Finding(s):

Ferrellgas did not provide staff with any procedure, documentation or records to

(1) Each gas pipeline company must odorize the gas in its pipeline at a concentration in air of at least one-fifth of the lower explosive limit, so that the gas is readily detectable by a person with a normal sense of smell.

Finding(s):

Ferrellgas did not provide staff with any procedure, documentation or records to support that there are adequate levels of odorization in this pipeline system.

Ferrellgas Response: The Procedures for documenting odorization levels are found in the Operations & Maintenance Manual pages 28-31. The monthly test is documented on the Odorization Report and maintained in the Pacific Seafood JS binder. A copy of the Odorization report was provided at the time of the on-site inspection

UTC: These procedures need to be in the O&M-Site Specific manual.

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13. **WAC 480-93-015(2) Odorization of gas**

(2) Each gas pipeline company must use an odorant testing instrument when conducting sniff tests. Sniff tests must be performed at least once monthly. Master meter systems that comply with 49 C.F.R. § 192.625(f) are exempt from this requirement

Finding(s):

Ferrellgas did not provide staff with any procedure, documentation or records to support that they use any odorant testing instrument, or have conducted sniff tests at the required frequency.

Ferrellgas Response: The procedures for testing propane odorant is outlined in the Operations & Maintenance Manual pages 28-31. The records were produced at the time of the on-site inspection. Ferrellgas testing method and results are documented on the Odorization report monthly. Refer to attached Operations & Maintenance Manual.

UTC: These procedures need to be in the O&M-Site Specific manual

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14. **WAC 480-93-015(3) Odorization of gas**

(2) Each gas pipeline company must use an odorant testing instrument when conducting sniff tests. Sniff tests must be performed at least once monthly. Master meter systems that comply with 49 C.F.R. § 192.625(f) are exempt from this requirement.

Finding(s):

Ferrellgas did not provide staff with any procedure, documentation or records to support that they use any odorant testing instruments or have conducted sniff tests at the required frequency.

Ferrellgas Response: The Odorator model, serial number, and last calibration date is listed on the provided Odorization Report. The procedure for proper usage is in the Operations & Maintenance Manual pages 30-32 and in the owner's manual.

UTC: These procedures need to be in the O&M-Site Specific manual.

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Finding(s):

Ferrellgas did not provide staff with any procedure, documentation or records to
photo of the JS binder or Coast Seafood

15. **WAC 480-93-018(3) Records**

(3) Each gas pipeline company must maintain a list of forms and databases, including examples where applicable, that specify what records the company maintains. Each gas pipeline company must make this list available to the commission upon request.

Finding(s):

Ferrellgas did not provide staff with any procedures for documentation of records or any actual records they maintain for this specific pipeline system.

Ferrellgas Response: Record keeping procedures are outlined in the Operations & Maintenance Manual Pages 33-34. All records are in the Pacific Seafood binder, which was provided during the on-site inspection.

UTC: These procedures need to be in the O&M-Site Specific manual.

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16. **WAC 480-93-080(2) Welder and plastic joiner identification and qualification**
(2) Personnel qualified to join plastic pipe must be requalified at least once annually, but not to exceed fifteen months between qualifications.
(a) Qualified written plastic joining procedures must be located on-site where plastic joining is being performed. (b) Plastic joiners must be requalified under an applicable procedure, if during any twelve-month period that person has not made any joints under that procedure. (c) In order to ensure compliance with (b) of this subsection and Title 49 C.F.R. Part 192.285(c), each gas pipeline company must either have a method of tracking production joints or requalify each person qualified to join plastic pipe at a frequency not to exceed twelve months. The method used to track production joints must be outlined in the gas pipeline company's procedures manual.

Finding(s):

Ferrellgas did not provide staff with any documentation or records that the plastic joiners who constructed the pipeline system were qualified, or any qualified written plastic joining procedures specific to this pipeline system.

Ferrellgas Response: Ferrellgas employees that operate this site are not trained certified welders for steel piping. The underground pipe at the Pacific Seafood location is Plastic (Poly) pipe for underground use. All joints are mechanical couplings above ground. Procedures for this type of installation are outlined in the Operations and Maintenance Manual pages 56-59

UTC: These procedures need to be in the O&M-Site Specific manual.

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17. **WAC 480-93-140(2) Service regulators**
(2) Each gas pipeline company must inspect and test service regulators and associated safety devices during the initial turn-on, and when a customer experiences a pressure problem. Testing must include determining the gas regulator's outlet set pressure at a specified flow rate. Each gas pipeline company must use pressure gauges downstream of the regulator during testing. Safety devices such as fracture discs are not required to be tested.

Finding(s):

Finding(s):

Ferrellgas did not provide staff with any procedure, documentation or records that the service regulator located on the pipeline system was inspected and tested when it was placed into service.

Ferrelgas Response: The procedures for installing, testing, and placing into service regulators is outlined in the Operations & Maintenance manual paged 42-46. The initial pressure test results are documented on the Regulator Inspection Report, which was provided at the time of the on-site inspection.

UTC: These procedures need to be in the O&M-Site Specific manual.

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19. **WAC 480-93-188(2) Gas leak surveys**

(2) Each gas pipeline company must maintain, test for accuracy, calibrate and operate gas detection instruments in accordance with the manufacturer's recommendations. If there are no written manufacturer's recommendations or schedules, then the gas pipeline company must test such instruments for accuracy at least monthly, but not to exceed forty-five days between testing, and at least twelve times per year. The gas pipeline company must recalibrate or remove from service any such instrument that does not meet applicable tolerances. Records of accuracy checks, calibration and other maintenance performed must be maintained for five years.

Finding(s):

Ferrelgas did not provide staff with any procedure, documentation or records that they maintain, test for accuracy, calibrate or operate gas detection equipment.

Ferrelgas Response: Ferrelgas uses the FerrellMeter to conduct the required Leak Survey. The equipment calibration checks are completed by trained and qualified Ferrelgas employees and documented internally quarterly. The procedures are outlined in the Safety Technical Section of the Ferrellway 7.19. I have attached a copy of STS_7.19.

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24. **NFPA 58 (2004 Edition) 6.8.4.6 Installation of Polyimide and Polyethylene Pipe, Tubing and Fittings**

An electrically continuous corrosion-resistant tracer wire (minimum AWG 14) or tape shall be buried with the polyamide or polyethylene pipe to facilitate locating the pipe. (A) One end of the tracer wire shall be brought aboveground at a building wall or riser. (B) The tracer wire or tape shall not be in direct contact with the polyamide or polyethylene pipe.

Finding(s):

Ferrelgas did not provide staff with any procedure, documentation or records for an electrically continuous corrosion-resistant tracer wire or that one was buried with the polyethylene pipeline.

Ferrelgas Response: Procedures for installing marking tracer wire for polyethylene piping is outlined in the Operations & Maintenance manual on page 59. I have attached a copy of the Operation & Maintenance manual for reference. Both risers have tracer wire above ground at the riser and verified as in place during

the line locate operation.

UTC: These procedures need to be in the O&M-Site Specific manual.

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