

July 27, 2022

Mr. Sean Mayo  
Pipeline Safety Director  
Washington Utilities and Transportation Commission

Subject: Pipeline Safety Evaluation  
Inspection Package Number: 8421

Dear Mr. Sean Mayo,

I am respectfully responding to your letter dated June 28, 2022, in which you requested a schedule and correction plan for Inspection Package Number: 8421. Cardinal FG is submitting this letter in response to the following alleged violations:

**Item Number 1.0: WAC 480-93-180 – Plans and Procedures**

**Finding:** Staff found that Cardinal's Operations and Maintenance Manual did not contain specific detailed procedures for inspecting and testing each pressure limiting station, relief device, and pressure regulating station. This is a critical safety procedure that must be in place and strictly adhered to every time that an inspection or lock up test is performed at a pressure regulating or limiting station.

Staff was presented with a draft version of a procedure for Cardinal's pressure limiting station shortly after this audit was concluded. Once this procedure is added to the current Operations and Maintenance Manual, and properly followed during required inspections and testing, then compliance will be attained.

**Cardinal FG Response:** Cardinal FG agrees with this finding. The day of the inspection, Stephen Hernandez contacted Everline's field manager to create a procedures for performing a lock up test on the Mooney regulators. Section 9.16 was added the Operations and Maintenance Program, which added this procedure. Everline incorporated this procedure in to the Operations and Maintenance program withing days following the Inspection.

**Item Number 2.0: WAC 480-93-180 – Plans and Procedures**

**Finding:** Staff found that there were several areas where Cardinal's Operations and Maintenance Manual did not contain specific detailed procedures for completing tasks. It was found that the specific state or federal code was often added to the manual as opposed to a step-by-step procedure for how to accomplish the intended action. WAC 480-93-180(3) specifically requires that the manual be written in sufficient, detailed, step-by-step instructions for a person with adequate training to perform the tasks described. Staff discussed this with Cardinal's Compliance Consultant (EverLine) during the audit and performed a thorough analysis of the most current manual with them. Two specific areas that were identified as lacking specific procedures were moving and lowering metallic pipelines, and how reports of third-party damage are checked against one-call tickets.

Since these procedures were not actually needed or implemented during the audit period, staff felt that the appropriate course of action was to identify these issues as areas of concern as opposed to violations.

**Cardinal FG Response:** Cardinal FG has been actively working on a new Operations and Maintenance Program roll-out in January 2023. These program will include detailed procedures for the Cardinal FG pipeline. In the meantime, Cardinal has reviewed the current program and removed any language that doesn't apply to them, such as regulations for compressor stations and distribution

pipelines. Regarding the two procedures in the last sentence of paragraph one above, Everline has updated the current program to reflect these procedures. See section 18.10 and 18.11 of the Operations and Maintenance program. 18.10 number 4 has been added to state that "If the pipeline is found to be damaged, the Cardinal will review the one call tickets that were made in the last three (3) years for the area damaged and follow up with the excavators who performed work in that area." Section 18.11 has been added to provide procedures for moving and lowering the pipeline. An updated version of the Operations and Maintenance Program will be submitted to [pipelineprogram@utc.wa.gov](mailto:pipelineprogram@utc.wa.gov).

Sincerely,



Stephen Smith  
Plant Manger  
Cardinal FG

CC: Chuck Miller, Mechanical Engineer, Cardinal FG  
Stephen Hernandez, Western Operations Director, Everline Compliance, LLC.

## Appendix A – 2022 Atmospheric Corrosion Inspection

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## Appendix B – 2022 Atmospheric Corrosion Remediation Project

