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**To:** [Pipeline Program, UTC](#)  
**Cc:** [mikesims@lpgassafety.com](mailto:mikesims@lpgassafety.com); [Mayo, Sean \(UTC\)](#); [Rukke, Scott \(UTC\)](#); [Dorrrough, Anthony \(UTC\)](#); [bsnow](#)  
**Subject:** RE: 2022 Liquefied Petroleum Gas Standard Inspection – The New Roche Harbor -Roche Harbor Resort – (Insp. No. 8446)  
**Date:** Thursday, September 8, 2022 5:33:27 PM  
**Attachments:** [UTILITIES AND TRANSPORTATION COMMISSION Responses.docx](#)

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External Email

Attention John Trier

Please find attached our response and planned actions to address probable violations found during the 2022 Liquefied Petroleum Gas Standard inspection. If you have any questions, please let me know.

Jason Miniken  
Roche Harbor Utilities  
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**From:** Pipeline Program, UTC <[pipelineprogram@utc.wa.gov](mailto:pipelineprogram@utc.wa.gov)>  
**Sent:** Friday, August 12, 2022 1:12 PM  
**To:** [bsnow <bsnow@rocheharbor.com>](mailto:bsnow@rocheharbor.com)  
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**Subject:** RE: 2022 Liquefied Petroleum Gas Standard Inspection – The New Roche Harbor -Roche Harbor Resort – (Insp. No. 8446)

Good morning Mr. Snow,

Attached you will find the results of the 2022 Liquefied Petroleum Gas Standard Inspection (Insp. No. 8446).

Please review the attached report and respond in writing by Sept. 13, 2022.

If you should have any questions or we may be of assistance, please contact Anthony Dorrrough at 360-664-4035 or [Anthony.dorrrough@utc.wa.gov](mailto:Anthony.dorrrough@utc.wa.gov).

Thank you,

**John Trier**

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## UTILITIES AND TRANSPORTATION COMMISSION

### 2022 Liquefied Petroleum Gas Standard Pipeline Safety Inspection

#### The New Roche Harbor – Roche Harbor Resort

We have a good reputation with the UTC operating our Public Water System at Roche Harbor. I just took over managing the Propane system in January and have been doing everything possible to get the operation into compliance, so that moving forward we will meet or exceed all state and federal rules and regulations. I take this seriously and will ensure that each probable violation is addressed appropriately and fully. I have addressed each probable violation below in red with a planned date of completion when appropriate.

#### PROBABLE VIOLATIONS

##### **1. 49 CFR §192.383(e)(5) Excess flow valve installation.**

*(e) Operator notification of customers concerning EFV installation. Operators must notify customers of their right to request an EFV in the following manner:*

*(5) Operators of master-meter systems and liquefied petroleum gas (LPG) operators with fewer than 100 customers may continuously post a general notification in a prominent location frequented by customers.*

*Finding(s):*

*There were no records to support that existing private/residential customers before 2017 were ever notified. This would not apply to any commercial NRH services as they would not be considered customers as it pertains to this pipeline system.*

**Response:**

We are actively developing a poster to post on our community bulletin board to offer residential customers their right to request an excess flow valve. We will also notify customers in our twice-annual newsletter. The EFV poster will be posted continuously starting December 1<sup>st</sup>, 2022

##### **2. 49 CFR §192.605(a) Procedural manual for operations, maintenance and emergencies.**

*(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.*

*Finding(s):*

*There were no records to support that procedures were established for prevention of accidental ignition.*

**Response:**

Our O&M manual section 7.4 titled Leaks without ignition details our procedures for the prevention of accidental ignition as follows:

D. Eliminate and prevent all potential ignition sources in the area and downwind of the leak, to include vehicle traffic, smoking, non-explosion-proof flashlights, electronic devices, lights, flares, lighted appliances in buildings downwind of the leak, etc.

E. Use a water mist spray, if available, to increase the dissipation of the vapor aboveground. For underground leaks, the gas must be purged from the soil.

We are in the process of reviewing our current O&M manual. Our updated O&M will include an addendum that will outline the specific procedures for the prevention of accidental ignition in more detail including controlling static electricity. Our New Roche Harbor Resort Operator Qualification Plan covers operating conditions that might occur and be recognized during the performance of a covered task. Expected completion date is January 2023

**3. 49 CFR §192.615(a) Emergency plans.**

*(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:*

*(1) Receiving, identifying, and classifying notices of events which require immediate response by the operator.*

*(2) Establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials.*

*(3) Prompt and effective response to a notice of each type of emergency, including the following:*

*(i) Gas detected inside or near a building.*

*(ii) Fire located near or directly involving a pipeline facility.*

*(iii) Explosion occurring near or directly involving a pipeline facility.*

*(iv) Natural disaster.*

*(4) The availability of personnel, equipment, tools, and materials, as needed at the scene of an emergency.*

*(5) Actions directed toward protecting people first and then property.*

*(6) Emergency shutdown and pressure reduction in any section of the operator's pipeline system necessary to minimize hazards to life or property.*

*(7) Making safe any actual or potential hazard to life or property.*

*(8) Notifying appropriate fire, police, and other public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency.*

*(9) Safely restoring any service outage.*

*(10) Beginning action under § 192.617, if applicable, as soon after the end of the emergency as possible.*

*(11) Actions required to be taken by a controller during an emergency in accordance with § 192.631.*

*Finding(s):*

*There were no records to support that any emergency procedures have been established.*

**Response:**

Section 7 of our O&M manual, Titled Emergency Response Procedures details our existing Emergency Procedures. We will review our current Emergency Response Procedures to ensure they meet 49 CFR §192.615(a).

**4. 49 CFR §192.615(B)(1) and (b)(2) Emergency plans.**

*(b) Each operator shall:*

*(1) Furnish its supervisors who are responsible for emergency action a copy of that portion of the latest edition of the emergency procedures established under paragraph (a) of this section as necessary for compliance with those procedures.*

*(2) Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective.*

*Finding(s):*

*No emergency procedures have been established. There were no records to support that operating personnel received any training on emergency procedures or verification of the training's effectiveness.*

**Response:**

Section 6.0 E of our O&M manual EMERGENCY PLANNING addresses our current Emergency plans. Our most recent training in June of 2021 covered emergency procedures. We are adjusting our training documentation procedures to clearly show our certified operators have received emergency procedures training and that training was effective.

**5. 49 CFR §192.616(j) Public awareness.**

*(j) Unless the operator transports gas as a primary activity, the operator of a master meter or petroleum gas system is not required to develop a public awareness program as prescribed in paragraphs (a) through (g) of this section. Instead the operator must develop and implement a written procedure to provide its customers public awareness messages twice annually. If the master meter or petroleum gas system is located on property the operator does not control, the operator must provide similar messages twice annually to persons controlling the property. The public awareness message must include:*

*(1) A description of the purpose and reliability of the pipeline;*

*(2) An overview of the hazards of the pipeline and prevention measures used;*

*(3) Information about damage prevention;*

*(4) How to recognize and respond to a leak; and*

*(5) How to get additional information.*

*Finding(s):*

*There were no records to support the development and implementation of a written procedure to provide public awareness messages twice annually to customers/users.*

**Response:**

We have a Public Awareness Plan. We will deliver public awareness messages in November of 2022 and a twice-annual newsletter thereafter.

**6. WAC 480-93-015(4) Odorization of gas**

*(4) Each gas pipeline company must follow the odorant testing instrument manufacturer's recommendations for maintaining, testing for accuracy, calibrating and operating such instruments. When the manufacturer does not provide a recommendation, each gas pipeline company must conduct accuracy checks and calibrate such instruments at least once annually, if the instrument is outside specified tolerances.*

*Finding(s):*

*There were no records to support compliance with this requirement.*

**Response:**

Our odorant testing equipment requires factory calibration every 12 months but not more than 15 months from the date of the previous factory calibration. Our Odorator 2 factory calibrated on the following dates: 08/18/17, 12/12/19, and most recently 2/17/22. Our next scheduled Factory calibration is 2/17/23. We will calibrate annually moving forward.

**7. WAC 480-93-015(5) Odorization of gas**

*5) Each gas pipeline company must keep all records of odorant usage, sniff tests performed, and odorant testing instrument calibration for five years.*

*Finding(s):*

*There were no records to support compliance with this requirement.*

**Response:**

As I mentioned at the beginning of this document, I took over the Propane utility in January of 2022. Since this point, all required odorant testing has been performed according to requirements. Moving forward, all odorant testing will be performed and documented according to schedule. Additionally, we will keep all odorant usage records added to our system. The records are stored both digitally and in files and will be saved for 5 years.

**8. 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):*

*There were no records to support that there was a procedure for testing and that services regulators had been tested during the initial turn-on.*

**Response:**

Testing of Service regulators was covered in the O.Q. Training, under Regulator Performance Testing most recently in June of 2021. The documentation for the testing is found via a document Titled "Propane System Safety Check" Roche Harbor Resort uses private contractors to install service lines and Meter Sets. Historically the contractor performs this test. Unfortunately, there is no documentation to support this.

Moving forward we will get Roche Harbor Propane staff CETP Certified in "Gas Check".

*Once the staff is trained and Certified: we will go through and systematically do a "Full System Safety Check" at every meter set, residential and commercial. Documenting each test. This will include "Full system flow pressure check to insure 11 inches Water Column during flow" and then "Lock Up" to insure proper regulator performance.*

Second Stage Regulator Performance tests shall be performed when the meter or regulator is changed out, initial turn-on, when a customer experiences a pressure problem, then again as necessary based on operations demands or as deemed necessary by the manager. We intend to complete the project promptly but due to workload and training requirements, this testing and documentation are scheduled for May of 2023.

**9. 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):*

*There were no records to support compliance with this requirement.*

**Response:**

Our gas detection equipment requires factory calibration every 12 months from the date of the previous factory calibration. Our gas detection equipment was factory calibrated on 2/10/22. Our next scheduled Factory calibration is 2/11/23. We will factory calibrate annually moving forward. The manual for our gas detection equipment recommends regular accuracy (field calibration) tests. We will immediately start doing monthly field calibrations. Records of accuracy checks, calibration, and other maintenance performed will be maintained for five years.

**10. 49 CFR §192.11(b) Petroleum gas systems.**

*(b) Each pipeline system subject to this part that transports only petroleum gas or petroleum gas/air mixtures must meet the requirements of this part and of ANSI/NFPA 58 and 59.*

*NFPA 58 5.7.5.1 Materials*

*Pipe or tubing used to vent regulators shall be one of the following:*

*(1) Metal pipe and tubing in accordance with 5.8.3*

*(2) PVC meeting the requirements of UL 651, Schedule 40 or 80 Rigid PVC Conduit*

*Finding(s):*

*Staff noted that at multiple locations on services, some of the PVC was the wrong type.*

**Response:**

This system follows NFPA 58 & 59 as well as 49 CFR codes. We are ordering parts and supplies to replace all improper venting pipes not meeting 5.8.3 and UL 651. This work should be completed in early 2023.

**11. 49 CFR §192.11(b) Petroleum gas systems.**

*(b) Each pipeline system subject to this part that transports only petroleum gas or petroleum gas/air mixtures must meet the requirements of this part and of ANSI/NFPA 58 and 59.*

*NFPA 58 6.10.9 Emergency shutoff valves*

*Emergency shutoff valves and backflow check valves required by the code shall be tested annually for the functions required by 5.10.4. The results of the tests shall be documented.*

*Finding(s):*

*There were no records to support compliance with this requirement.*

*Response:*

*This system follows NFPA 58 & 59 as well as 49 CFR codes. Our emergency shutoff valve testing will be documented annually according to schedule.*

**12. 49 CFR §192.11(b) Petroleum gas systems.**

*(b) Each pipeline system subject to this part that transports only petroleum gas or petroleum gas/air mixtures must meet the requirements of this part and of ANSI/NFPA 58 and 59.*

*NFPA 58 6.11 Hydrostatic relief valve installation*

*A hydrostatic relief valve or a device providing pressure-relieving protection shall be installed in each section of piping and hose in which liquid LP-Gas can be isolated between shutoff valves so as to relieve the pressure that could develop from the trapped liquid to a safe atmosphere or product-retaining section.*

*Finding(s):*

*Staff found that a critical section of piping at the newly installed regulator station/pressure relief which was designed to be isolated between shutoff valves needs to have a hydrostatic relief valve per code instead of a normal valve which is what NRH installed.*

*Response:*

*Our contractor that does our maintenance on the Vaporizer and other "Gas plant" associated equipment has been made aware he needs to bring a Hydrostatic relief Valve to be installed when he returns next trip which has yet to be scheduled but will be done as soon as all the parts are in.*