

November 19, 2024

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
621 Woodland Square Loop S.E. • Lacey, Washington 98503
P.O. Box 47250 • Olympia, Washington 98504-7250

RE: 2024 Hydrogen Gas Standard Records and Field
Review – Airgas Merchant Kalama – (Insp. No. 8755)

In response to Standard Records and Field Inspection 8755 conducted on October 7, 2024 - October 8, 2024, Airgas Merchant Kalama offers the following actions/correction plan for the probable violations and area of concerns listed.

RE: 2024 Hydrogen Gas Pipeline Safety Inspection 8755-Air Liquide. Kalama, WA

PROBABLE VIOLATION Item No.1

Inspectors Findings

The operator could not document they had validated their OPID by June 30, 2012, as required by the regulation.

Requirement: 49 CFR 192.739 Pressure limiting and regulating stations: Inspection and testing.

(a) Each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is—

Response:

The following step has been taken to address compliance with 49 CFR §192.739

Airgas Kalama Operations and Maintenance manager will create work orders / PMs to assure that pressure limiting and regulating station testing are conducted per CFR 192.739 requirements. Work orders will be routed to multiple levels of management with completion flags to ensure timely completion.

PROBABLE VIOLATION Item No.2

Inspectors Findings

Airgas could not provide a test report for 2021. A report was provided 2022 and 2023 capacity of relief devices.

Requirements: 49 CFR 192.743 Pressure limiting and regulating stations: Capacity of relief devices.

(a) Pressure relief devices at pressure limiting stations and pressure regulating stations must have sufficient capacity to protect the facilities to which they are connected. Except as provided in § 192.739(b), the capacity must be consistent with the pressure limits of 192.201(a). This capacity must be determined at intervals not exceeding 15 months, but at least once each calendar year by testing the devices in place or by review and calculations.

Response:

The following step has been taken to address compliance with 49 CFR 192.743

Aigas Kalama Operations and Maintenance manager will create work orders / PMs to assure that pressure limiting and regulating stations are tested and validated to ensure that relief capacity is consistent with the pressure limits of 192.201 (a) CFR 192.739 requirements. Work orders will be routed to multiple levels of management with completion flags to ensure timely completion.

AREA OF CONCERN Item No.1

Inspectors Findings:

Airgas submitted the 2022 NPMS report, July 20, 2022. All other reports were submitted on time.

Requirements: 49 CFR 191.29 National Pipeline Mapping System.

(b) The information required in paragraph (a) of this section must be submitted each year, on or before March 15, representing assets as of December 31 of the previous year. If no changes have occurred since the previous year's submission, the operator must comply with the guidance provided in the NPMS Operator Standards manual available at www.npms.phmsa.dot.gov or contact the PHMSA Geographic Information Systems Manager at (202) 366-4595.

Response:

The following step has been taken to address compliance with 49 CFR 191.29

Aigas Kalama Operations and Maintenance manager will create work orders / PMs to assure that Annual NPMS submissions are completed per CFR 191.29. Work orders will be routed to multiple levels of management with completion flags to ensure timely completion.

If you need additional information, please call me at

Sincerely,

E. Grayson Taylor

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