

Citizens Advisory Committee on Pipeline Safety

PO Box 47250

Olympia, Washington 98504-7250



May 21, 2001

Dockets Facility
U.S. Department of Transportation
Research and Special Programs Administration
Room PL - 401
400 Seventh Street, Southwest
Washington, D.C. 20590

Subject: Comments on Docket No. RSPA – 00 – 7408; Notice 1

In response to the tragic pipeline explosion in Bellingham, Washington, in June 1999, which took the lives of three young people, the Washington State Legislature enacted legislation and provided funding to strengthen and enhance pipeline safety efforts in Washington. The 2000 legislation also created a Citizens Advisory Committee on Pipeline Safety (“Committee”) and Governor Gary Locke appointed members to the Committee in August 2000. The new law directed the Committee to provide advice and comment to appropriate state and federal agencies and officials on matters related to hazardous liquid and gas pipeline safety, routing, construction, operation and maintenance.

In this context the Advisory Committee wishes to provide the following comments on the Research and Special Programs Administration’s (“RSPA”) proposed rulemaking related to hazardous liquid pipeline integrity management plan requirements for operators of pipelines with less than 500 miles of pipeline:

The Advisory Committee agrees with RSPA’s Office of Pipeline Safety that all operators of hazardous liquids pipelines should be required to establish integrity management plans for their facilities, irrespective of the length of pipeline owned or operated. By paralleling the rule established by OPS in December 2000, requiring operators of hazardous liquids pipelines with *more* than 500 miles of pipeline, the current proposed rule helps assure all cities, counties and states that the pipelines running beneath us are operated safely. Integrity management is common sense that should apply to all pipeline facilities carrying potentially lethal cargo. We applaud OPS for working to strengthen its rules to make sure that all companies take pipeline safety seriously.

The Committee suggests that as integrity management plans are being developed, companies should be required to reach out to potentially affected cities, towns, and counties to seek public input on identification of high consequence areas (“HCA’s”).

Pipeline companies should have the opportunity to work with communities to help reassure citizens that their facilities are operated and maintained for the highest level of safety. We suggest that development and dissemination of pipeline integrity management planning may be one additional effective way for pipeline operators to regain the public’s confidence in them.

Thank you for this opportunity to comment on the proposed rulemaking.

Citizens Advisory Committee on Pipeline Safety

PO Box 47250

Olympia, Washington 98504-7250



Sincerely,

Chuck Mosher

Chairman, Citizens Advisory Committee on Pipeline Safety