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May 25, 2012

Submitted electronically to [mwoodard@utc.wa.gov](mailto:mwoodard@utc.wa.gov)

Mr. David Lykken  
Pipeline Safety Director  
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RECEIVED  
MAY 25 2012  
State of Washington  
UTC  
Pipeline Safety Program

Re: Response to WUTC letter dated 4/30/12; O&M Manual Inspection

Dear Mr. Lykken:

In the Washington UTC 2012 Operations and Maintenance Manual Inspection – Avista HQ letter dated 4/30/12 there were four areas of concern (AOCs) noted. The description of the AOCs and Avista's responses are as follows:

1. **49 CFR 191.22 National Registry of Pipeline and LNG Operators.**
  - (c) *Changes. Each operator of a gas pipeline, gas pipeline facility, LNG plant or LNG Facility must notify PHMSA electronically through the National Registry of Pipeline and LNG Operators at <http://opsweb.phmsa.dot.gov> of certain events.*
  - (d) *Reporting. An operator must use the OPID issued by PHMSA for all reporting requirements covered under this subchapter and for submissions to the National Mapping System.*

**Finding(s):**

Although Avista did show that it reports electronically to NPMS as is required, they do not have a written procedure detailing how this happens. As this filing is required for operators of natural gas distribution systems, Avista must document this process in a written procedure.

**Avista Response:**

Avista acknowledges that our O&M Manuals do not specifically address the procedure Avista follows to annually update the National Pipeline Mapping System (NPMS) as is required by 49 CFR 191.22. The 2013 revision to the Gas Standards Manual, Specification 4.14 will be amended to include this procedure.

2. **WAC 480-93-178 Protection of Plastic Pipe**

- (1) *Each gas pipeline company must have detailed written procedures for the storage, handling, and installation of plastic pipelines. Except for joining procedures, and unless the gas pipeline company has more stringent procedures, the company must store, handle and install plastic pipe in accordance with the latest applicable manufacturer's recommended practices.*

**Finding(s):**

Avista must document its storage and handling practices as meeting the *latest applicable manufacturer's recommended practices* unless the company can document it has more stringent procedures. Avista's current storage and handling procedures do not state they meet the latest applicable manufacturer's recommended practices or document current practices are more stringent. They must do one or the other to meet the intent of this regulation.

**Avista Response:**

Avista acknowledges the company's O&M Manuals lack specificity regarding protection of plastic pipe as delineated in WAC 480-93-178. The 2013 revision to the Gas Standards Manual, Specification 3.13 will be amended to meet this WAC requirement.

3. **WAC 480-93-140 Service Regulators**

- (1) *To ensure proper operation of service regulators, each gas pipeline company must install, operate, and maintain service regulators in accordance with federal and state regulations, and in accordance with the manufacturer's recommended installation and maintenance practices.*

**Findings(s):**

Avista must document its installation, operation and maintenance practices are in accordance with the manufacturer's recommended installation maintenance practices. Avista maintains its current procedures were written according to the manufacturer's recommended installation instructions. However, the procedures do not state specifically this is the case. This language needs to be added to the current procedure.

**Avista Response:**

Avista acknowledges our O&M Manuals neither detail that our installation, operation and maintenance of service regulators conform to applicable federal and state regulations nor document they are installed, operated and maintained in accordance with the manufacturer's recommended practices as required by WAC 480-93-140. The 2013 revision to the Gas Standards Manual, Specification 2.22 will be edited to add this required language.

**4. 49 CFR 192.479 Atmospheric Corrosion Control**

- (a) *Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.*
- (b) *Coating material must be suitable for the prevention of atmospheric corrosion.*

**Findings(s):**

Avista does have an atmospheric control procedure to prevent, control and maintain corrosion. However, the current procedure does not state the material being used is "suitable for the prevention of atmospheric corrosion" per 49 CFR 192.479. Language needs to be added to this procedure to ensure compliance.

**Avista Response:**

Avista acknowledges the company's O&M Manuals do not specifically mention our atmospheric corrosion control coatings are "suitable for the prevention of atmospheric corrosion" as required in 49 CFR 192.479. The 2013 revision of the Gas Standards Manual, Specifications 3.32 and 5.14 will be amended to meet this requirement.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ja Thackston", with a long horizontal flourish extending to the right.

Jason Thackston  
Vice President, Energy Delivery

JT/rkb

CC: Mike Faulkenberry, Chief Gas Engineer  
David Howell, Compliance Manager  
John Schwendener, Gas Delivery Director  
Gas Compliance Commission Correspondence File