

Mr. Robert L. Sluder
Vice-President, Operations
Williams Gas Pipeline - West
295 Chepeta Way, P.O. Box 58900
Salt Lake City, UT 84158-0900

RE: CPF NO. 5-2000-1004

Dear Mr. Sluder:

Enclosed is a Final Order issued by the Associate Administrator for Pipeline Safety in the above-referenced case. It makes findings of violations of pipeline safety standards and acknowledges completion of corrective action. Your receipt of the Final Order constitutes service of that document under 49 C.F.R. §190.5. This case is now closed and no further enforcement action is contemplated with the respect to the matters involved in this case. Thank you for your cooperation in our joint effort to ensure pipeline safety.

Sincerely,

Gwendolyn M. Hill
Pipeline Compliance Registry
Office of Pipeline Safety

Enclosure

VIA CERTIFIED MAIL (RETURN RECEIPT REQUESTED) AND TELECOPY

DEPARTMENT OF TRANSPORTATION
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION
WASHINGTON, DC 20590

In the Matter of)
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)
Williams Gas Pipeline - West, Respondents.) CPF No. 5-2000-1004

FINAL ORDER

On January 18 - April 20, 2000, representatives of the Western Region, Office of Pipeline Safety (OPS) and the Washington Utility and Transportation Commission, pursuant to Chapter 601 of 49 United States Code, conducted onsite pipeline safety inspections of operations and maintenance records and pipeline facilities for your Sumas, Battleground, Redmond, Spokane, and Pasco Districts in the State of Washington. As a result of the inspections, the Director, Western Region, OPS, issued to Williams Gas - West (Williams), by letter dated May 5, 2000, a Notice of Probable Violation and Proposed Compliance Order. In accordance with 49 C.F.R. § 190.207, the Notice proposed finding that Respondent had violated 49 C.F.R. §§ 192.465(b), 192.603, 192.605, 192.736, 192.739, 192.745, and proposed that Respondent take certain measures to correct the alleged violations.

Following an extension of time to respond, Respondent responded to the Notice by letter dated June 8, 2000 (Response). Respondent contested some allegations, offered explanations and provided information concerning the corrective actions it has taken.

FINDINGS OF VIOLATION

Item 1 in the Notice alleged that Respondent violated 49 C.F.R. §192.465(b), as Respondent's records available at the time of the inspection indicated that certain rectifiers at Redmond District, Battle Ground District and Pasco District were not inspected within the maximum 2½ month interval required by § 192.465(b).

Respondent explained that during late 1998 and early 1999 they were in the process of converting from one corrosion control database to another, which resulted in the late rectifier reads identified by the OPS inspector. Respondent advised that additional training of operating personnel occurred through 1999 and the first six months of 2000 in an effort to ensure that all rectifier readings are completed at the proper frequency and to enhance data entry accuracy by personnel.

The fact that Respondent was converting from one corrosion control database to another does not negate the fact that the violation exists. Inspection and testing at required intervals are essential to knowing that the pipeline equipment is being maintained, will function properly and that its integrity is not compromised. Accordingly, I find Respondent violated § 192.465(b) by not having adequate documentation that it inspected certain rectifiers, as more fully described in the Notice, at Redmond District, Battle Ground District and Pasco District within the maximum 2½ month interval required.

Item 2 in the Notice alleged that the Respondent violated 49 C.F.R. §192.603, which requires each operator to keep records necessary to administer the procedures established under §192.605. The Notice alleged three instances in which Respondent failed to maintain adequate records necessary to administer the damage prevention program requirements. In the first instance, Respondent's records in the Redmond District were inadequate to verify compliance with § 192.614 (c)(5), which requires temporary markings of buried pipelines in the area of excavation and § 192.614 (c) (6), which requires inspection of pipelines that an operator has reason to believe could be damaged by excavation activities.

Respondent argued that the excavation damage prevention records provided during inspection verified compliance with regulations and that Respondent's employee documented this in his daily work diary. Respondent acknowledged the concern raised regarding adequate documentation and has responded by implementing changes to capture one-calls in one document.

Maintaining adequate records is a requirement for the safe operation of pipeline facilities, not an option. Documentation that pipelines are marked prior to excavation activities coupled with documentation of any required follow up inspection of pipelines that the operator has reason to believe could be damaged by excavation activities is an essential part of the Damage Prevention Program. The personal daily work diary of the employee who performs each damage prevention activity may not supplement or be substituted for official documentation of work done. Without adequate records it is difficult for an operator to know whether it is in compliance with damage prevention requirements.

The second and third allegations of violation of §192.603 relate to the Dalles Lateral. In the second instance, the Notice alleged that the records available for the Battle Ground District were inadequate to verify compliance with §192.706(a), leakage surveys of transmission pipelines which do not contain an odor or an odorant, in Class 3 locations. As for the third instance, Respondent failed to produce leak survey records for 1998 to verify that the Dalles Lateral, which is located in a Class 3 location, was leak surveyed at least twice for the calendar year.

Respondent explained that the Dalles Lateral in Oregon was erroneously entered into the system as a Class 3 location when it is a Class 1 location. Respondent further explained that the location was inspected as a Class 3 in 1999, then missed as a Class 3 and inspected as a Class 1 in 1998. Respondent is reviewing

all class locations to ensure the records are correct and believes that continued implementation of its Maintenance Management System will enhance inspection scheduling in the future.

Verification that leak surveys are conducted is an essential requirement to the safe operation of a pipeline. The lack of a leak survey in a Class 3 location could result in a leak going undetected in a populated area. Respondent's records were not adequately maintained. Therefore, I find Respondent violated 49 C.F.R. §§ 192.603 and 192.605.

Item 3 of the Notice alleged that Respondent violated 49 C.F.R. §192.736, as the gas detection and alarm system at Turnwater Compressor Station, in the Redmond District, was not properly maintained. The warning lights at the doors of the compressor building were not functioning properly because the light bulbs were of an inadequate voltage rating for the system and were burned out at the time of inspection.

Respondent acknowledged that the 12 volt warning lights were not functioning properly at the time of the inspection and explained that the proper 24 volt lights are now in use.

Respondent does not contest the alleged violation. Accordingly, I find that Respondent violated 49 C.F.R. §192.736.

Item 4 of the Notice alleged that Respondent violated 49 C.F.R. §192.739, by not inspecting the regulators and pressure relief devices at the Palouse-Albion Meter Station, in the Spokane District, within the required intervals. In particular, records indicate that inspections were done on April 20, 1998 and then again on October 14, 1999, exceeding the 15-month inspection interval required by 85 days.

In response to Item 4, Respondent stated that a data entry error during transition from one maintenance tracking system database to another in 1999 caused the late inspections. Respondent offered information about the efforts it is making to prevent recurrence.

Respondent's response does not dispute that the inspections and tests were untimely. Accordingly, I find that Respondent violated 49 C.F.R. §192.739.

Item 5 alleges that the Respondent violated 49 C.F.R. §192.745, as the documentation and information available at the time of the inspection was inadequate to verify that each transmission line valve that might be required during any emergency was inspected and partially operated at intervals not exceeding fifteen months. The documentation and information available, at the time of the inspection, for the Sumas District was inadequate to verify compliance for the calendar year 1998 annual maintenance of the three Stanwood Lateral valves and the Pasco District for eleven valves on the Hedges Lateral and six valves on the Spokane Lateral for calendar year 1999. The Palouse-Albion Meter Station tap valve, for the Spokane District, was inspected on April 20, 1998 and then again on October 14, 1999, exceeding the 15-month inspection interval required by §192.745 by 85 days.

Respondent explained that the inspections were 10 days late due to an erroneous assumption of the operating personnel that the 15-month frequency specified in § 192.745 gave them until the last day of the 15th month to complete the inspection.

All things considered, Respondent's inspections would have been late. Respondent did not argue that the inspections had been completed on time. Accordingly, I find that Respondent violated 49 C.F.R. § 192.745.

These findings of violation will be considered prior offenses in any subsequent enforcement action taken against Respondent.

COMPLIANCE ORDER

The Notice proposed a compliance order with respect to Items 1-5. Respondent has demonstrated corrective action addressing all Items in the proposed compliance order. The Director, Western Region, OPS has accepted these measures as adequately fulfilling the requirements of the pipeline safety regulations and no further action is needed with respect to those items in the compliance order.

Under 49 C.F.R. §190.215, Respondent has a right to petition for reconsideration of this Final Order. The petition must be received within 20 days of Respondent's receipt of this Final Order and must contain a brief statement of the issue(s). In accordance with 49 C.F.R. §190.215(d), filing the petition does not stay the effectiveness of this Final Order. However, in the petition Respondent may request, with explanation, that the Final Order be stayed. The terms and conditions of this Final Order are effective upon receipt.

Stacey Gerard
Associate Administrator
for Pipeline Safety

Date Issued