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CERTIFIED MAIL

November 12, 2012

David D. Lykken
Pipeline Safety Director
Washington Utilities and Transportation Department
1300 S. Evergreen Park Dr. P.O. Box 47250
Olympia, WA 98504-7250

Dear Mr. Lykken:

This letter is in response to your letter dated October 17, 2012, RE: 2012 Operation and Maintenance Manual Review Inspection – Lamb Weston/BSW LLC – Warden, WA. Nine Probable Violations.

Enclosed are updated pages addressing each of the inspection deficiencies indicated in your letter. Each item has been numbered in the left margin to identify update. Updated pages have been replaced in the Operations and Maintenance Manual to correct the deficiencies as noted.

Unless the commission has further questions regarding the language changes, and since the probable violations were only documentation changes, rather than operational issues, we advocate that the commission consider the matter resolved without further commission action.

Thanks you for this opportunity to respond.

Sincerely,

Andy Bateman
Plant Manager

Cc: Lex Vinsel
Kevin O Hogan, NW Metal Fab
Marvin Price, LW/BSW

LambWeston

1.05 Compliance with State Rules and Regulations and Minimum Federal Safety Standards

Scope:

To specify the Rules, Regulations and Codes, which shall govern the construction, testing, operation, and maintenance of the Lamb Weston / BSW LLC, Warden Washington pipeline facilities.

Policy:

The Lamb Weston / BSW LLC, pipeline shall be constructed, operated, and maintained in compliance with Title 49 of CFR, Parts 40, 191, 192 & 199 as issued and amended by the Office of Pipeline Safety, U.S. Department of Transportation, with the additional provisions of Washington Utility and Transportation Commission.

Responsibilities:

1.0 Operation and maintenance of the Lamb Weston / BSW LLC, pipeline from the main shutoff valve on the Williams Tap downstream on the Lamb Weston / BSW LLC, pipeline shall be the responsibility of Northwest Metal Fab & Pipe, Inc., a pipeline maintenance contractor that Lamb Weston / BSW LLC, has authorized to be their representative. As Lamb Weston / BSW LLC, authorized representative, Northwest Metal Fab & Pipe, Inc. will be responsible to operate their assigned portion of the Lamb Weston / BSW LLC, pipeline in conformance with state and federal regulations and will perform the inspections, prepare the necessary reports, update any and all operation, maintenance and emergency manuals and perform the necessary repairs as described in the following sections.

480-93-180

2.0 Each segment of pipeline that becomes unsafe must be replaced, repaired, or removed from service. An actionable plan shall be written and the pipe shall be repaired or replaced as necessary. The actionable plan shall include time frames for repair or replacement as necessary depending on the severity of the pipeline condition.

480-93-007 Application of rules — Responsibility for contractors

(1) This chapter applies to the following activities of each gas pipeline company: The construction, operation, maintenance, and safety of gas facilities used in the gathering, storage, distribution, and transmission of gas in this state.

(2) This chapter, with the exception of WAC 480-93-240, does not apply to gas pipeline systems exclusively under federal jurisdiction for compliance with pipeline safety regulations.

(3) While the commission's gas pipeline safety statutes and rules impose obligations on each gas pipeline company, a gas pipeline company may contract with a person to do tasks that are subject to these rules, such as excavation, construction, and maintenance. If the gas pipeline company's contractor (or any of its subcontractors) engages in conduct that violates commission rules applicable to the gas pipeline company, the gas pipeline company is subject to penalties and all other applicable remedies, as if the gas pipeline company itself engaged in that conduct.

5.13 Cathodic Protectio

The standard for maintaining corrosion control on the exterior of any steel portion of pipe surface below ground on the pipeline.

480-93-110
Corrosion control

1.0 Lamb Weston / BSW LLC shall record and retain a record of each cathodic protection test, survey, or inspection required by 49 CFR Subpart I, and chapter 480-93 WAC. Lamb Weston / BSW LLC shall keep all records of each test, survey, or inspection for a minimum of five years, except those records specified in 49 CFR § 192.491(c) which the gas pipeline company must retain for the life of the gas pipeline facility.

2. 2.0 Lamb Weston / BSW LLC shall complete remedial action within ninety days to correct any cathodic protection deficiencies known and indicated by any test, survey, or inspection. An additional thirty days shall be allowed for remedial action if due to circumstances beyond Lamb Weston / BSW LLC control the company cannot complete remedial action within ninety days. Lamb Weston / BSW LLC shall be able to provide documentation to the commission indicating that remedial action was started in a timely manner and that all efforts were made to complete remedial action within ninety days. Extenuating circumstances allowing Lamb Weston / BSW LLC to exceed the ninety-day time frame include right of way permitting issues, availability of repair materials, or unusually long investigation or repair requirements.

3.0 Cathodic protection equipment and instrumentation shall be maintained, tested for accuracy, calibrated, and operated in accordance with the manufacturer's recommendations. When there are no manufacturer's recommendations, then instruments must be tested for accuracy at an appropriate schedule determined by Lamb Weston / BSW LLC or Northwest Metal Fab & Pipe.

4.0 Lamb Weston / BSW LLC; pipeline is cathodically protected by a impressed current rectifier system for external corrosion control.

5.0 CRITERIA FOR CATHODIC PROTECTION

A minimum negative (cathodic) voltage of -100mv below -0.850 volt, with reference to a copper sulfate half-cell. If a pipe to soil voltage above -0.950 is found prompt remedial action will be taken. Voltages should be between a high of -0.950 vdc and a low of –2.500 vdc negative voltage.

Procedure:

A Nace qualified person will follow Nace procedures for taking cathodic readings.

Records of the inspection will be recorded on the Cathodic Protection Survey form

5.11 Atmospheric Corr[illegible]n Inspection

1.0 Atmospheric corrosion (corrosion pitting on above ground gas system) will be evaluated at intervals of 3 years not to exceed 39 months. Remedial action shall be taken within 90 days to control all above ground corrosion.

2.0 The atmospheric corrosion survey will be conducted on the line once every three years according to 49 CFR 192.

3.0 Procedure:

Visually inspect all above ground piping and record the inspections as noted.

Records of the inspection will be recorded on the Atmospheric Corrosion form.

480-93-185 Gas leak investigation

1.0 Lamb Weston / BSW LLC shall investigate any odor, leak, explosion, or fire, which may involve its gas pipelines, promptly after receiving notification. Where the investigation reveals a leak, Lamb Weston / BSW LLC shall grade the leak in accordance with WAC 480-93-186, and take appropriate action. Lamb Weston / BSW LLC shall retain the leak investigation record for the life of the pipeline.

4. 2.0 In the event of an explosion, fire, death, or injury, Lamb Weston / BSW LLC shall not remove any suspected gas facility until the commission or the lead investigative authority has designated the release of the gas facility. Once the situation is made safe, Lamb Weston / BSW LLC shall keep the facility intact until directed by the lead investigative authority.

5. 3.0 When leak indications are found to originate from a foreign source (for example, a gasoline tank, a sewer, a marsh or customer-owned piping), and the situation is ongoing and potentially hazardous Lamb Weston / BSW LLC shall

(a) Take appropriate action regarding its own facilities to protect life and property

(b) Report the leak promptly to the source facility owner or operator and, where appropriate, to the police department, fire department, or other appropriate governmental agency. If the property owner or an adult person occupying the premises is not available, Lamb Weston / BSW LLC shall, within twenty-four hours of the leak investigation, send by first-class mail, addressed to the person occupying the premises, a letter explaining the results of the investigation. Lamb Weston / BSW LLC shall keep a record of each letter sent for five years.

DETERMINING LEAK SPREAD

PURPOSE

This section provides requirements for determining a leak spread and placement of bar holes.

SCOPE

A. FI unit may be used to determine the general area of leakage spread at the surface.

B. A CGI shall be used to:

- Determine the amount of leakage.
- Determine the extent of area involved.
- Determine the class of leak found.

PROCEDURE

6. The placement of bar holes and observing of readings with a CGI will continue until the perimeter of the leak has been well defined as rapidly and thoroughly as possible.
Indication of the presence of hydrocarbons shall cause the technician to place bar holes so that the presence of hydrocarbons can be confirmed by use of a combustible gas indicator, CGI.
Good judgment shall be used to determine the number of bar holes to provide an adequate survey. The absolute minimum number of bar holes placed will be determined by the following:

A. Bar holes shall be placed along the pipeline at a maximum of 20-foot intervals until gas readings are zeroed (2 consecutive readings of 0) using a CGI.

B. Any service line within the leakage area shall be bar holed at a maximum of 20-foot intervals until gas readings are zeroed (2 consecutive readings of 0) using a CGI.

C. Against structure foundations and around the perimeter of affected structures until gas readings are zeroed (2 consecutive readings of 0) using a CGI.

D. When evaluating any gas leak indication and the leak area extends to a building wall, the leak investigation shall continue into the building whenever possible, using a CGI.

E. The placement of bar holes and taking of samples with a CGI will continue until the perimeter of the leak spread is well defined.

F. Readings should be documented on appropriate forms.

G. When evaluating gas leak indication and the leak area extends to a building wall or substructure where persons may enter, the leak investigation shall continue inside whenever possible.

H. Record all findings on appropriate form

8.04 Pipeline leaks and ards

1.0 The degree and extent of the hazard from a pipeline failure will vary with the rate of leakage, the location of leakage and the atmospheric conditions.

2.0 The inherent possibility of gas escaping from a pressurized system is great. Gas escaping in enclosed or semi-enclosed spaces can create extremely explosive atmospheres, or atmospheres devoid of oxygen causing asphyxia. Gas escaping at relatively high flow rates will remove anything in its path, and create a fire hazard.

3.0 A healthy respect should be developed for pressurized gas since it contains so much destructive potential.

4.0 Mechanical Couplings

Mechanical Couplings may be used as a temporary or emergency leak repair on the gas line until a permanent repair can be completed. The temporary mechanical couplings will not be buried or used as a permanent repair.

5.0 WHAT TO DO IN THE EVENT YOU SMELL A GAS ODOR

If gas odor is present, report it immediately to your supervisor and they will contact one of the people on the "Emergency Response Team" listed in this booklet. They will take the appropriate steps to investigate what is causing the odor. They will check for leaks and decide if the area must be secured and who to call.

If the odor causes shutdown or evacuation of area due to dangerous conditions, the WUTC, shall then be called.

8. **6.0 Leak Policy: All leaks shall be repaired when found!**

a) When a leak is repaired a leak survey shall be performed to ensure that there are no other residual gas leaks.

b) If any other residual gas leaks are found a continued investigation shall be done to discover and repair all leaks

c) Lamb Weston / BSW LLC shall check the perimeter of the leak area with a combustible gas indicator.

1. **d) Lamb Weston / BSW LLC shall perform a follow-up inspection on all leak repairs with residual gas remaining in the ground as soon as practical, but not later than thirty days following the repair.**

Preventing accidental ignition

Per 192.751, each operator shall take steps to minimize the danger of accidental ignition of gas in any structure or area where the presence of gas constitutes a hazard of fire or explosion, including the following:

1. When a hazardous amount of gas is being vented into open air, each potential source of ignition must be removed from the area and a fire extinguisher must be provided.
2. Gas or electric welding or cutting may not be performed on pipe or on pipe components that contain a combustible mixture of gas and air in the area of work.
3. Post warning signs, where appropriate.

a.

GAS LEAK REPOR

Applicable Code: 192.605

Lamb Weston / BSW LLC.
Warden, Washington

Date and time of leak detection:

Date and time reported:

Date and time of leak investigated:

Inspected By:

Date and time leak repaired:

Location of the leak:
Where was the person located when he discovered (smelled) the leak?
(Sufficiently describe to allow ready location by other qualified personnel)

Grade of the leak:

Pipeline classification: Transmission

Caller's Name:

Address:

Telephone No:

Nature of Reported Leak: (Component)

Size and material that leaked:

Pipe condition:

Type of repair:

Leak cause (Dig in):

Date pipe installed (if known):

Magnitude and location of CGI readings left:

Unique identification numbers (such as serial numbers) of leak detection equipment

This form to be completed for every reported leak indication: