



STATE OF WASHINGTON
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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CERTIFIED MAIL

January 7, 2014

Mr. James Daly
Vice President of Manufacturing
Solvay Chemicals Inc.
3333 Richmond Ave
Houston, TX 77098

Dear Mr. Daly:

**RE: 2013 Hazardous Liquid O&M Manual Inspection – Solvay Chemicals Inc.-Solvay
Chemicals Hydrogen Pipeline**

Staff from the Washington Utilities and Transportation Commission (staff) conducted an Operations, Maintenance and Emergencies Manual (O&M) inspection on November 7, 2013, of Solvay Chemicals Inc.-Solvay Chemicals Hydrogen Pipeline. The inspection included a review of the O&M manual.

Our inspection indicates four areas of concern, which unless corrected, could potentially lead to future violation of state and/or federal pipeline safety rules.

Your response needed

Please review the attached report and respond in writing by February 7, 2014. The response should include how you plan to address the areas of concern noted.

If you have any questions or if we may be of any assistance, please contact Anthony Dorrough at (360) 664-1318. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

David D. Lykken
Pipeline Safety Director

cc: Mike Banigan, Site Manager, Solvay Chemicals Inc.



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2013 Natural Gas Pipeline Safety Inspection
Solvay Chemicals Inc. – Solvay Chemicals Hydrogen Pipeline

The following areas of concern involving Title 49 CFR Part 192 and WAC 480-93 were noted as a result of the 2013 inspection of the Solvay Chemicals Inc. – Solvay chemicals Hydrogen Pipeline. The inspection included a comprehensive review of the operation and maintenance (O&M) manual.

AREAS OF CONCERN

WAC 480-93-180 Plans and Procedures

(1) Each gas pipeline company must have and follow a gas pipeline plan and procedures manual for operation, maintenance, inspection and emergency response activities that are specific to the gas pipeline company's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR 191, 192 and Chapter 480-93 WAC, and any plans or procedures used by any gas pipeline company associated contractors.

1. **49 CFR §192.225 (b) Welding Procedures**

(b) Each welding procedure must be recorded in detail, including the results of the qualifying tests. This record must be retained and followed whenever the procedure is used.

Finding(s):

Although it is known and understood that Northwest Metal Fab & Pipe will perform all welding services according to PHMSA 49 CFR Part 192, Subpart E - Welding of steel pipes. Solvay Chemicals Inc. failed to state in the O&M manual that qualified written welding procedures be on site whenever welding is being performed.

2. **49 CFR §192.709 Transmission lines: Record keeping**

(c) A record of each patrol, survey, inspection, and test required by subparts L and M of this part must be retained for at least 5 years or until the next patrol, survey, inspection, or test is completed, whichever is longer.

Finding(s):

Solvay Chemicals Inc. failed to add this applicable portion of the CFR to the O&M Manual.

3. **WAC 480-93-188 (5) (a-f) Gas Leaks**

(5) Each gas pipeline company must keep leak survey records for a minimum of five years. At a minimum, survey records must contain the following information:

- (a) Description of the system and area surveyed (including maps and leak survey logs);
- (b) Survey results;
- (c) Survey method;

- (d) Name of the person who performed the survey;
- (e) Survey dates; and
- (f) Instrument tracking or identification number.

Finding(s):

Solvay Chemicals Inc. failed to add this applicable portion of the WAC to the O&M Manual.

4. **49 CFR §192.727 (e) Abandonment or Deactivation of Facilities**

- (e) If air is used for purging, the operator shall insure that a combustible mixture is not present after purging.

Finding(s):

Solvay Chemicals Inc. failed to add this applicable portion of the CFR to the O&M Manual.