



J.R. Simplot Company  
14124 Wheeler Rd NE  
Moses Lake, WA 98837

December 14, 2017

re: Inspection Number 7242

Sean Mayo  
Pipeline Safety Director  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
Olympia WA, 98504-7250

RECEIVED  
RECORDS MANAGEMENT  
2017 DEC 27 AM 8:10  
STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION  
COMMISSION

Dear Mr. Mayo:

Please find attached the J.R. Simplot response to the 2017 Biogas Gas Pipeline Standard Inspection, Inspection Number 7242.

Should you have any questions please do not hesitate to contact us directly.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. McKellar".

Mark McKellar  
President  
J.R. Simplot Company

Enclosure  
Inspection 7242 response package

cc  
Cosentino Consulting Inc.  
Pipeline facility files



## **Response to Simplot Moses Lake 2017 Biogas Pipeline Standard Inspection Inspection Number 7242**

### **Probable Violations**

#### **1. 49 CFR S192.807 Recordkeeping**

Each operator shall maintain records that demonstrate compliance with this subpart.

(b) Records supporting an individual's current qualification shall be maintained while the individual is performing the covered task.

#### **Finding:**

While at the J.R. Simplot office, staff reviewed valve inspection records and operator qualification records. The valve inspection performed on September 30, 2016 was performed by Andy Erickson. Andy Erickson's operator qualifications were valid from March 26, 2012 to March 26, 2015. Andy Erickson was not re-qualified prior to performing the inspection, therefore, J.R. Simplot did not have records supporting an individual's qualification while the individual was performing the covered task.

#### **Response:**

Mr. Erickson had previously been performing this task throughout his qualification period and had transferred those duties to a qualified employee as part of staff changes. Upon the abrupt departure of that employee, Mr. Erickson performed this task until a replacement was trained and re-qualified not realizing his qualification had expired.

As additional background, Mr. Erickson's supervisor did possess a valid qualification at the time also did not realize Mr. Erickson's qualification had expired.

To prevent reoccurrence, each employee receives a copy of their qualification list yearly which includes the expiration date, and will receive a direct email advising them of an approaching expiration.