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TELEPHONE 509-734-4500 FACSIMILE 509-737-9803
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UTC
Pipeline Safety Program

November 21, 2017

Sean Mayo – Pipeline Safety Director
Washington Utilities and Transportation Commission
1300 S Evergreen Park Dr S.W.
PO Box 47250
Olympia WA 98504-7250

Subject: Response to Natural Gas Standard Inspection – CNGC Aberdeen District (Insp. No 7270)

Dear Mr. Mayo,

This letter is intended to address two probable violations. Specifically, we are addressing how we have brought the probable violations into full compliance. The inspection was conducted September 12-14, 2017 in the Aberdeen District office.

PROBABLE VIOLATION

I. WAC 480-93-188(1)(a) Gas Leak Surveys

- (1) Each gas pipeline company must perform gas leak surveys using a gas detection instrument covering the following areas and circumstances.
 - (a) Over all mains, services, and transmission lines including the testing of the atmosphere near other utility (gas, electric, telephone, sewer, or water) boxes or manholes, and other underground structures.

Finding(s):

Staff found three distribution service addresses where records indicated a failure to perform a leak survey. The following gas distribution services were not marked as part of the leakage survey and CNGC could not produce sufficient records to prove that these services had indeed been surveyed:

- 220 South 3rd Street, Shelton, WA
- 228 South 3rd Street, Shelton, WA
- 410 West Business Park Road, Shelton, WA

Cascade Response

Cascade Natural Gas Corporation (CNGC) acknowledges that the records for these segments of pipeline do not allow CNGC to demonstrate that these segments were surveyed. CNGC attributes this omission to an error in highlighting. A training session has been held with CNGC staff to reinforce the importance of documentation accuracy. Please see Attachment A for training records.

CNGC has re-surveyed the addresses in question; the dates of the surveys are as follows:

- 220 South 3rd Street, Shelton WA – September 18, 2017
- 228 South 3rd Street, Shelton WA – September 18, 2017
- 410 West Business Park Road, Shelton WA – August 28, 2017

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2. WAC 480-93-200(1)(c) Reporting Requirements

- (1) *Each gas pipeline company must give notice to the commission by telephone using the emergency notification line (see WAC 480-93-005(8)) within two hours of discovering an incident or hazardous condition arriving out of its operations that results in:*
- (b) The evacuation of a building, or a high occupancy structure or area;

Finding(s):

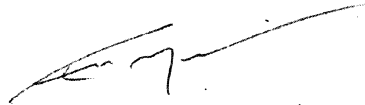
Staff found records indicating there was an incident on July 12, 2017, at 3009 Wishkah Road, Aberdeen, WA, where the Aberdeen Fire Department evacuated two structures. CNGC failed to report the July 12 incident/evacuation to the Commission.

Cascade Response

CNGC has sent a letter to the Aberdeen Fire Department to reinforce the need to notify CNGC of any evacuations resulting from natural gas incidents. Please see Attachment B for the letter sent to the Aberdeen Fire Department. Aberdeen District staff have also been re-trained on CP 925 – Emergency Policy. This training was inclusive of the need to specifically ask about evacuations when checking in with Incident Command. Please see Attachment C for training records.

Please contact Chris Grissom at (509) 734-4535 with questions or comments.

Respectfully Submitted,



Eric Martuscelli
Vice President, Operations
Cascade Natural Gas Corporation

Attachment A: Supporting Documentation for Citation #1

CNG 231
05/14

Training/Review Signature Sheet

District Management and/or contractors will provide prompt and meaningful training to affected employees of procedures/processes changes that directly or indirectly related to existing work practices.

By signing this form the employee is confirming they have read, reviewed and or have been provided sufficient training to confidently execute the procedure/process.

District Management will ensure that a copy of this signed form is scanned into:

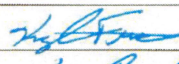
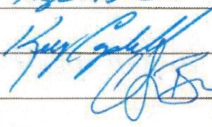

SharePoint- Districts Tab-Company Procedures-OM Changes

Contractors will scan and forward forms to the MOP.

District: Aberdeen _____

Review or Training of: CP # 715 Leak Survey _____

Date of review: 11/16/17 _____

Print Name	Sign Name
Hyle Fritz	
KELLY CAMPBELL	
Cady Bridges	

Original – District

Copy – SharePoint

Attachment B: Supporting Documentation for Citation #2



8113 W. GRANDRIDGE BLVD., KENNEWICK, WASHINGTON 99336-7166
TELEPHONE 509-734-4500 FACSIMILE 509-737-9903

November 17, 2017

Tom Hubbard, Fire Chief
Aberdeen Fire Department
700 W Market St
Aberdeen WA 98520

Dear Mr. Hubbard:

We have been informed by the Washington Utilities and Transportation Commission (WUTC) that on July 12, 2017 at 3009 Wishkah Road, Aberdeen, WA, the Aberdeen Fire Department evacuated two structures due to a natural gas incident and Cascade Natural Gas Corporation (CNGC) was not notified of the evacuation by the Fire Department. Per WAC Code 480-93-200 natural gas operators are required by law to notify the WUTC within two hours if any structures are evacuated due to a natural gas related incident.

To comply with this law, CNGC requests immediate notification from the Aberdeen Fire Department in the event that any structures are evacuated due to a natural gas incident and to ensure that we are included as part of the incident command structure in all future occurrences.

A portion of this law is provided below for your convenience. You can review this law in its entirety by using the following link: <http://apps.leg.wa.gov/wac/default.aspx?cite=480-93-200>.

WAC 480-93-200(1)(c) Reporting requirements.

(1) Each gas pipeline company must give notice to the commission by telephone using the emergency notification line (see WAC 480-93-005(8)) within two hours of discovering an incident or hazardous condition arising out of its operations that results in:

- (a) A fatality or personal injury requiring hospitalization;
- (b) Property damage valued at more than fifty thousand dollars;
- (c) The evacuation of a building, or a high occupancy structure or area;
- (d) The unintentional ignition of gas;
- (e) The unscheduled interruption of service furnished by any gas pipeline company to twenty-five or more distribution customers;
- (f) A pipeline or system pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020; or
- (g) A significant occurrence, in the judgment of the gas pipeline company, even though it does not meet the criteria of (a) through (f) of this subsection.

If you have any questions or concerns, please do not hesitate to contact me.

A handwritten signature in blue ink that reads "Lynsay Demko".

Lynsay Demko, Public Awareness Coordinator
Ph (509) 734-4584 | Cell (509) 572-8475
www.cngc.com/safety-education

In the Community to Serve

Attachment C: Supporting Documentation for Citation #2

CNG 231
05/14

Training/Review Signature Sheet

District Management and/or contractors will provide prompt and meaningful training to affected employees of procedures/processes changes that directly or indirectly related to existing work practices.

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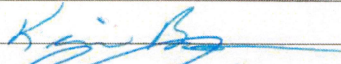
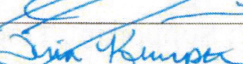
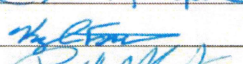
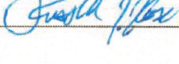

SharePoint- Districts Tab-Company Procedures-OM Changes

Contractors will scan and forward forms to the MOP.

District: Aberdeen

Review or Training of: CP 925 section 8.11.1

Date of review: 11/8/2017

Print Name	Sign Name
KEVIN BEENER	
Charles Jenkins	
Tina Kempton	
Kyle Fitz	
Russell J. Korst	

Original – District

Copy – SharePoint