

E. Grayson Taylor
Manager, Fleet Safety
Airgas USA LLC
12800 West Little York
Houston, Tx. 77041
281-830-4792
grayson.taylor@airgas.com

VIA Regular Mail and pipelineprogram@utc.wa.gov

September 28, 2018

Mr. Sean C. Mayo
Pipeline Safety Director
State of Washington
UTILITIES AND TRANSPORTATION COMMISSION
31300 S. Evergreen Park Dr. S. W.
P.O. Box 47250
Olympia, Washington 98504-7250

RE: 2018 Hydrogen Gas Standard Inspection, Airgas Merchant Gas/Airgas USA LLC, Inspection # 7574

Mr. Mayo,

Pursuant to your letter dated August 27, 2018, attached, please see our response to your inquiry and request of four probable violations and one field observation following the 2018 Hydrogen Gas Standard Inspection of our site on July 24 - 30, 2018.

Should you have any questions or desire further information, please feel free to contact me direct at 281-830-4792.

Sincerely,
AIRGAS USA LLC

E. Grayson Taylor

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Manager, Fleet Safety

Enclosures

cc: Scott Moon, Kalama Plant Manager
Derek Norwood, Washington Utilities and Transportation Commission

Probable Violations

Item No.1

Inspector Finding:

Airgas was unable to provide documentation that they had notified NPMS of no changes to their system by March 15 for calendar years 2015 and 2016. Airgas was also unable to provide documentation of their submission to NPMS regarding their name change from Air Liquide Large Industries U.S. LP to Airgas Merchant Gas Kalama for calendar year 2017.

Response:

Submission completed September 28, 2018.

Item No. 2

Inspector Finding:

Airgas was unable to provide documentation that they had filed revisions of their gas pipeline manual and procedure manual with the commission annually. The current revision on file with the commission has a revision date of July 2012.

Response:

Kalama Operations and Procedure manual with revision date of July 2017 was filed with the commission on September 13, 2018. All parties immediately responsible for revising the gas pipeline Kalama Operations and Procedure manual have been instructed on this requirement. Electronic reminders to make this filing with the commission will generate prior to March 15 annually.

Item No. 3

Inspector Finding:

Records show that Airgas submitted their annual report for to the commission for 2016 after the March 15 deadline. The annual report was received by the commission on July 13, 2016.

Staff found no record that Airgas has submitted their annual report to the commission for 2017. The annual report for 2017 was due to the commission by March 15, 2017.

Response:

The 2017 Report was submitted to the commission on September 13, 2018. Electronic reminders to make this filing with the commission will generate prior to March 15 annually.

Item No. 4

Inspector Finding:

Records show that Airgas submitted Construction Defects and Materials Failures Report after March 15 deadline for 2015, 2016 and 2017. The report for 2015 was received April 22, 2016, the report for 2016 was received March 17, 2017 and the report for 2017 was received July 23, 2018.

Response:

Electronic reminders have been added to personnel immediately responsible for meeting this requirement. Reminders are to generate prior to March 15 annually.

Areas of concern or field observations:

Inspector Finding:

Airgas' leak survey records do not directly identify which instrument was used for the leak survey, making it difficult to determine equipment calibration and identification. A separate document was provided showing equipment id and calibration but it was unclear if the date shown was the due date or calibration date and there was nothing linking that separate document to the leak survey form provided.

Response:

The vendor performing Airgas' Kalama facility leak surveys was contacted and will update their instrument documentation based on calibration requirements for the instrument used. The instrument used, most current calibration date and due date of next calibration will be recorded.