



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY (360) 586-8203

Sent Via Email and Electronic Return Receipt Mail

August 30, 2018

Todd Wilson
Vice President, NA H2O2 Manufacturing
Solvay Chemical, Inc.
1130 Independence Parkway South
La Porte, TX 77571

**RE: 2018 Hydrogen Gas Operations and Maintenance Manual Review
Solvay Chemicals, Inc. (Insp. No. 7577)**

Dear Mr. Wilson:

Staff from the Washington Utilities and Transportation Commission (staff) conducted an Operations and Maintenance Manual Review of Solvay Chemicals, Inc. (Solvay) on Jul. 30-31. Our inspection indicates **eight** probable violations as noted in the enclosed report.

Your response needed

Please review the attached report and respond in writing by Oct. 1. The response should include how and when you plan to bring the probable violations into full compliance.

What happens after you respond to this letter?

The attached report presents staff's decision on probable violations and does not constitute a finding of violation by the commission at this time.

After you respond in writing to this letter, there are several possible actions the commission, in its discretion, may take with respect to this matter. For example, the commission may:

- Issue an administrative penalty under RCW 81.04.405; or

- Issue a complaint under RCW 81.88.040, seeking monetary penalties, changes in the company's practices, or other relief authorized by law, and justified by the circumstances. Any pipeline company that violates any pipeline safety provision of any commission order, or any rule in this chapter including those rules adopted by reference, or chapter 81.88 RCW is subject to a civil penalty not to exceed two hundred thousand dollars for each violation for each day that the violation persists. The maximum civil penalty for a related series of violations is two million dollars; or
- Consider the matter resolved without further commission action.

We have not yet decided whether to pursue a penalty or complaint in this matter. Should the commission decide to assess a penalty or initiate a complaint, your company will have an opportunity to respond and formally present its position.

If you have any questions or if we may be of any assistance, please contact Derek Norwood at (360) 664-1296. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,



Sean C. Mayo
Pipeline Safety Director

cc: Alicia Fuentes, Site Manager, Solvay alicia.fuentes@solvay.com
Pascal Mansy, Engineering and Maintenance Manager, Solvay pascal.mansy@solvay.com

UTILITIES AND TRANSPORTATION COMMISSION
2018 Hydrogen Gas Pipeline Safety Inspection
Solvay Chemical, Inc.

The following probable violations of WAC 480-93 were noted as a result of the 2018 inspection of Solvay Chemical, Inc. The inspection included a review of the company operation and maintenance manual, emergency response manual, and field procedures.

PROBABLE VIOLATIONS

1. WAC 480-93-180 Plans and Procedures

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

Finding:

49 CFR 192.487 requires that operators repair or replace corroded pipelines when certain conditions are met. Solvay has no procedure describing when and how repairs will be made to corroded pipe.

2. WAC 480-93-180 Plans and Procedures

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

Finding:

WAC 480-93-110(5) requires that pipeline companies conduct inspections or tests for electrical isolation between metallic pipeline casings and metallic pipelines at least once annually, but not to exceed fifteen months. Solvay has no procedure describing the process and frequency of casing inspections.

3. WAC 480-93-180 Plans and Procedures

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

Finding:

WAC 480-93-110(5)(c) requires that pipeline companies clear shorted casings where practical. Solvay has no procedure describing their response if shorted conditions are found.

4. WAC 480-93-180 Plans and Procedures

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

Finding:

WAC 480-93-110(3) requires that cathodic protection equipment and instrumentation be maintained, tested for accuracy, calibrated, and operated in accordance with the manufacturer's recommendations. Solvay has no procedures for operating, calibrating and maintaining cathodic protection testing equipment.

5. WAC 480-93-180 Plans and Procedures

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

Finding:

49 CFR 192.605(b)(8) requires that pipeline companies periodically review the work done by operator personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance. Solvay has no procedure for periodically reviewing work done by personnel during normal operation and maintenance.

6. WAC 480-93-180 Plans and Procedures

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

Finding:

WAC 480-93-188(1) requires that pipeline companies perform gas leak surveys using gas detection equipment. Solvay has no procedure describing how the leak survey will be performed and what areas will be leak surveyed.

7. **WAC 480-93-180 Plans and Procedures**

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

Finding:

WAC 480-93-188(2) requires that gas pipeline companies maintain, test for accuracy, calibrate and operate gas detection instruments in accordance with the manufacturer's recommendations. Solvay has no procedures for calibrating and operating gas detection instruments.

8. **WAC 480-93-180 Plans and Procedures**

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

Finding:

WAC 480-93-188(3) requires that gas pipeline companies conduct leak surveys at least monthly for unodorized gas pipelines. Solvay has no procedure indicating the frequency of gas leak surveys.