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December 10, 2020

Sean Mayo – Pipeline Safety Director  
Washington Utilities and Transportation Commission  
PO Box 47250  
Olympia, WA 98504-7250

Subject: CNGC response to Probable Violation RE: 2020 Natural Gas Standard Inspection – Cascade Natural Gas Company – Aberdeen District (Insp. No. 8049)

Dear Mr. Mayo,

This letter is in response to the Washington Utilities and Transportation Commission's (WUTC) notice of one probable violation dated November 19, 2020 stemming from the Natural Gas Standard Inspection of Cascade Natural Gas Corporation (CNGC) conducted from October 7, 2020 to November 6, 2020 (Inspection No. 8049). Specifically, we are addressing how we are bringing the probable violation into full compliance.

#### **PROBABLE VIOLATION**

**I. 49 CFR §192.465(b). External corrosion control: Monitoring.**

*(b) Each cathodic protection rectifier or other impressed current power source must be inspected six times each calendar year, but with intervals not exceeding 2 ½ months, to ensure that it is operating.*

**Finding(s):**

Records indicate that CNGC conducted their Aberdeen District rectifier inspections on 4/08/2019 and again on 06/28/2019. The following rectifiers exceeded 2-1/2 months between inspections:

- a. Aberdeen rectifier #1 located at Tecumseh west of Young.
- b. Aberdeen rectifier #2 located at Morgan and Wooding.
- c. Hoquiam rectifier #3 located at Wood Ave and Marion St.
- d. Hoquiam rectifier #4 located at Simpson Ave and 11th St.
- e. Montesano rectifier #5 located at Elma and Satsop S.
- f. Montesano rectifier #6 located at Cascade Ln. HP line.
- g. Elma rectifier #12 located at N. 16th St north of W. Young St.
- h. Elma rectifier #13 located at Stamper Rd and Upper Falls Creek Rd.
- i. McCleary rectifier #8 located at S. 7th and W. Fir.
- j. Shelton rectifier #9 located at Delaware and Harvard.
- k. Shelton rectifier #10 located at King St and E. F St.
- l. Shelton rectifier #14 located at E. Andrews Drive @ 009-R-019.

**NOTE:**

In addition to 49 CFR §192.465(b), CNGC procedure CP 755, Section 8.6.2.1, requires rectifier inspections to be conducted between the 1<sup>st</sup> and 15<sup>th</sup> of the month that the survey is due.

#### **Cascade Response**

CNGC acknowledges the findings brought forth by the WUTC. As such, CNGC has reviewed the Remote Monitoring Unit (RMU) data of the twelve rectifiers listed above which exceeded the inspection frequency requirement of 49 CFR §192.465(b) and has determined that the rectifiers were operating as intended at the time of the needed inspection.

Moreover, CNGC has determined human error to be the primary causal factor in exceeding the inspection frequency requirement of the above rectifiers. At the time of the bi-monthly rectifier inspections, the qualified CNGC employee performing the inspections was simultaneously performing annual corrosion surveys. This led to a workload that surpassed the capacity of the Aberdeen District and a failure to meet the compliance deadline of June 22, 2019.

To ensure compliance with 49 CFR §192.465(b), CNGC has qualified additional personnel in the Aberdeen District to provide supplementary support should the corrosion inspection workload become too demanding for one employee. Additionally, CNGC is currently developing a Utility Group procedure, *OPS 402 – Corrosion Control*, which will utilize RMU data collection for bi-monthly inspections in lieu of in-person DC volt and DC amp readings. The implementation of OPS 402 will supersede CNGC CP 755 and is projected for the second quarter of 2021.

Along with the implementation of OPS 402 will come the deployment of the Maximo Corrosion Track (Company approved compliance tracking software) which will provide more seamless compliance date tracking, management, and automated notifications to mitigate the risk of human error moving forward.

Please contact Josh Sanders at (701) 222-7773 with questions or comments.

Respectfully Submitted,

A handwritten signature in black ink that reads "Pat Darras". The signature is written in a cursive, flowing style.

Pat Darras  
Vice President, Engineering & Operations Services  
Cascade Natural Gas Corporation