

July 27, 2022

Mr. Sean Mayo  
Pipeline Safety Director  
Washington Utilities and Transportation Commission

Subject: Pipeline Safety Evaluation  
Inspection Package Number: 8420

Dear Mr. Sean Mayo,

I am respectfully responding to your letter dated June 28, 2022, in which you requested a schedule and correction plan for Inspection Package Number: 8420. Cardinal FG is submitting this letter in response to the following alleged violations:

**Item Number 1.0: 49 CFR 192.615 – Emergency Plans**

**Finding:** Cardinal could not provide documentation of meetings or trainings conducted with appropriate fire, police, and other public officials. It was determined that these meetings have not been conducted in the past due to a misunderstanding by the operator. The operator was distributing pipeline specific information to local officials by way of a handbook and believed this was satisfying the requirements of this rule. Staff discussed the need to schedule meetings or training scenarios with local officials in order to be in compliance.

After the completion of this inspection, staff was advised that on May 31, 2022, Cardinal initiated and hosted a tabletop training scenario with local officials via video conference. Cardinal's Compliance Consultant (EverLine) provided staff with a detailed outline of what was covered during the training, as well as a list of the officials who attended. This type of training is what is required going forward to maintain compliance.

**Cardinal FG Response:** On May 31, 2022, Cardinal FG Pipeline Manager Chuck Miller, Jonathan Lemon, Tim Blume, and Eric Larson of Everline Compliance, LLC all participated in a table top drill ran by Stephen Hernandez of Everline Compliance, LLC. The documentation from this table top was sent to the WUTC in June 2022.

**Item Number 2.0: 49 CFR 192.605 – Procedural manual for operations, maintenance and emergencies**

**Finding:** After the completion of this inspection, staff was advised that on May 31, 2022, Cardinal initiated and hosted a tabletop training scenario with local officials via video conference. Cardinal's Compliance Consultant (EverLine) provided staff with a detailed outline of what was covered during the training, as well as a list of the officials who attended. This type of training is what is required going forward to maintain compliance.

Cardinal failed to follow their procedure regarding remediation of atmospheric corrosion. Cardinal's contractor performed an atmospheric corrosion inspection on April 2, 2019 and documented that the coating at the William's delivery station needed cleaning and touch-up of slight superficial corrosion. According to Cardinal's procedures in place at the time of the inspection, light corrosion was to be repaired within 90-days or less. This procedure was in the Operations and Maintenance Manual Revision 4B, Section 4.6(g), issued on Sept. 28, 2015, by Cosentino Consulting, Inc. According to records, this coating cleaning and touch-up of slight superficial corrosion was not completed.

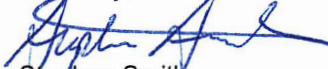
The most recent atmospheric corrosion inspection conducted on June 8, 2022, indicated that the exposed pipe at the William's delivery station needs washed and painted. Specifically, documentation indicated that there was minor corrosion and peeling at the pig launcher location of

the station. Staff also observed during the field audit portion of the inspection that the overall coating condition of the exposed pipe was starting to show significant wear and was peeling and cracking in multiple places.

It should be noted that Cardinal's new procedures prepared by The Compliance Group on June 19, 2020, states that minor corrosion will be scheduled for remediation within 12 months, not to exceed 15 months. This is in Section 10.11(5) of the new procedure manual. Due to the previous report of slight atmospheric corrosion not being remediated, and the overall worsening condition of the above ground pipe observed during the field audit, it is found to be a violation of CFR 192.605, for failing to follow procedures for timely completing remedial actions.

**Cardinal FG Response:** Cardinal FG could not locate and record that the pipeline was painted after the April 2019 inspection. The 2022 atmospheric corrosion inspection (Appendix A) was conducted on June 8, 2022. On the week of July 11<sup>th</sup>, Everline Compliance corrected all of the findings from the June 2022 inspection. See Appendix B for pictures of the repainted facility. Moving forward, remedial action for minor atmospheric corrosion will be remediated withing 12 months not to exceed 15 months in accordance with the Cardinal FG Operations and Maintenance Program section 10.11 and 10.12 number 5.

Sincerely,



Stephen Smith  
Plant Manger  
Cardinal FG

CC: Chuck Miller, Mechanical Engineer, Cardinal FG  
Stephen Hernandez, Western Operations Director, Everline Compliance, LLC.

## Appendix A – 2022 Atmospheric Corrosion Inspection

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## Form 8 Atmospheric Corrosion Survey

Company Name	Cardinal FG	Date	6-8-22	
Location	Williams Tap / Plant	Mile Post		
Is person conducting task qualified in accordance with the Cardinal Operator Qualification Program? If no, do not proceed with inspection.			YES	NO
			<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Inspection Report

**\*Grade (Check appropriate Box Below)**

**A = No Corrosion**  
**B = Minor Corrosion**    Minor Surface Rust  
**C = Major Corrosion**    Wall loss in the form of pits (depressions), scale accumulation of corrosion products, blisters.

**\*\*Type of damage (Check appropriate box below)**

**1 = Disbonding**                      **5 = Rust stains**  
**2 = Cracking**                        **6 = Algae, Dirt, Grease**  
**3 = Peeling**  
**4 = Blistering**                        **7 = Other (Describe under remarks)**

Structure Identification (Name, Number of Description)	*Grade			**Type of Damage (Describe under remarks)							Comment (excellent, No remedial action is necessary at this time)	
	A	B	C	1	2	3	4	5	6	7		
Williams Tap	A											
Williams Reg St.		B						X				Need to wash
Pig Launcher		B				X						and paint Need ss fittings on
Pig Receiver												Regs
Plant Reg St.		B						X				Need to wash Need ss fittings on Regs

### Comments

Line Heater should also be painted and the glycol flushed and replaced

Surveyor	Eric Larson	Date	6-8-22	
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## Appendix B – 2022 Atmospheric Corrosion Remediation Project

