

December 9, 2021

STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION  
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Subject: Plan of Correction  
2021 Hydrogen Pipeline Standard Inspection – Nouryon Pulp and Performance  
Chemicals – (Insp. No. 8288)

Dear Mr. Mayo-

Nouryon Pulp and Performance Chemicals LLC is submitting this letter to your office to update the Utilities And Transportation Commission on Nouryon's progress for resolution of the alleged violations from Inspection Package No. 8288. The inspection took place on the following dates:

The records portion of the inspection was conducted virtually via a MS Teams meeting on October 12, 2021, and the onsite inspection of regulated assets occurred on November 2, 2021. An exit interview was conducted after the on-site inspection at Nouryon's Moses Lake facility on November 2, 2021.

#### Item No 1

**Description:** 192.605 Procedural manual for operations, maintenance, and emergencies.

General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

**Findings:** During the records inspection, it was noted that the required annual review of written procedures or processes for 2019 could not be documented. This timeframe was during the ownership transition from Akzo Nobel to Nouryon. The Compliance Group also took over as compliance administrator for Nouryon and conducted a review of the required 192.605 procedures in 2020. As this review would have been the required remedy for not completing the 2019 review, staff considers this finding moot at this point. However, staff emphasizes that missing or incomplete records could lead to future enforcement actions and Nouryon must be diligent to ensure all required records are completed and stored for future compliance audits.

**Nouryon Comment:** Nouryon agrees with the finding above for the years referenced. Since the implementation of Everline's (The Compliance Group's) programs, the annual reviews have been completed on time.

## Item No 2

**Description:** §192.805 Qualification program.

Each operator shall have and follow a written qualification program. The program shall include provisions to:

- (a) Identify covered tasks;
- (b) Ensure through evaluation that individuals performing covered tasks are qualified;

**Findings:** During the field portion of the inspection, it was noted that Nouryon's Form F4, Valve Inspection has a section for atmospheric corrosion. It appears inspections for atmospheric corrosion occurred as noted on the forms. However, operator qualifications for all employees who do valve inspection did not include atmospheric corrosion. It was also noted that the previously determined jurisdictional limits for the pipeline were from the outlet flange on valve V5601 at Nouryon to the inlet flange of valve V5602 at Simplot did not include the valves. As such, it appears that inspecting the valves was not a code requirement but rather good practice. As these valves provide vital safeguards for the pipeline in that they allow the line to be isolated during an emergency, the valves should be considered jurisdictional and therefore part of the regulated system and operated and maintained accordingly. Nouryon should qualify appropriate individuals in atmospheric corrosion inspection and add Nouryon's Form 10 Atmospheric Corrosion Inspection to compliance records.

**Nouryon Comment:** Nouryon has not treated this valve as one that has needed to be inspected for atmospheric corrosion in the past. Since the audit, Jacob St. Mary has completed his Operator Qualification exam and has been qualified for inspecting pipelines and appearances for signs of atmospheric corrosion. Since this valve was installed in 2019, Nouryon plans on conducting the atmospheric corrosion inspection on this valve on or before the 39 month deadline in 2022.

## Item No 3

**Description:** §192.615 Emergency plans.

- (a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:
- (b) Each operator shall:
  - (1) Furnish its supervisors who are responsible for emergency action a copy of that portion of the latest edition of the emergency procedures established under paragraph (a) of this section as necessary for compliance with those procedures.
  - (2) Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective.

**Findings:** During the records review it was noted that employee emergency response training was not documented for years 2018 and 2020. Section 19 of the O&M manual is Nouryon's Emergency Response Plan. Section 19.1 notes training will occur "periodically" to ensure employees are knowledgeable of the procedures and training is effective. Periodically is not defined. Nouryon should define the timeframe for when employees are trained to ensure they remain knowledgeable and can effectively carry out the plan.

**Nouryon Comment:** Section 19.1 of Nouryon's Emergency response program has been updated to state that "periodically, but at least annually."

Nouryon Pulp and Performance Chemicals LLC is committed to full compliance with the Commission's rules and appreciates your consideration in this matter.

Sincerely,  
Jacob St. Mary  
HSES Manager  
Nouryon Pulp and Performance Chemicals LLC