

CERTIFIED MAIL

November 29, 2001

Chris Hoidal
Director, Western Region
Office of Pipeline Safety
12600 West Colfax Avenue, Suite A-250
Lakewood, Colorado 80215-3736

Dear Mr. Hoidal:

Subject: Olympic Pipeline Criteria for Excavation

The Washington Utilities and Transportation Commission ("Commission") Pipeline Safety Division Staff would like to comment to the Federal Office of Pipeline Safety ("OPS") on Mr. Bob Eiber's, *Report on Overview Assessment of the 16 Inch Diameter Olympic Pipeline Integrity* to the City-County Pipeline Safety Consortium of Washington ("Consortium").

The OPS and the Commission's Pipeline Safety Division are currently working together to inspect and regulate both interstate and intrastate hazardous liquid pipelines in Washington State. Through an interstate agreement with the Department of Transportation, signed in June 2000, the Commission has begun its regulatory relationship with interstate pipeline operators including ongoing monitoring and reporting.

The Commission Pipeline Safety Division Staff concurs with proposed recommendations from Mr. Eiber's report to the Consortium for a more conservative dig criteria than is currently being considered by Olympic Pipeline for its 20 inch line and other laterals. We believe that the 0.20 inch approach and a comprehensive integrity evaluation to identify all gouges are valid for the following reasons:

1. The geometry pig data has a typical tolerance range of plus or minus one tenth of an inch (+/- 0.1"). The proposed dig criteria for dents by Olympic Pipeline is 0.25" and by the Consortium is 0.20". The difference between the Olympic Pipeline and the Consortium proposals is 0.05-inch, which is in the tolerance range of the geometry pig. This is not significant for smooth dents without gouges (See Bob Eiber's report - page 28).

2. Based on the analyses of Olympic's 16" diameter pipeline digs, actual dent depths were generally greater than the estimated dent depths from the in-line inspection tool data (See Eiber's report – page 17, figure 2). Furthermore, using the dent criteria of 0.25" may be borderline and could accept dents with gouges that would have failure pressures below 100% specified minimum yield strength. It is prudent to adopt a conservative approach of 0.20".
3. Not all gouges can be identified with high-resolution Magnetic Flux Leakage ("MFL") and geometry tools. The orientation of the gouge is important. The MFL tool can identify a gouge in the circumferential direction of a pipe and the high-resolution Transverse Flux Inspection ("TFI") tool is designed to identify defects in the axial direction. The TFI information is essential for a comprehensive evaluation of anomalies. Olympic Pipeline has started running the TFI tools since late October 2001. Since a gouge can exist without a dent, WUTC Staff recommend that all gouges be identified with the TFI and MFL tools.

We are aware that Federal Pipeline Safety Code incorporates ASME B31.4 by reference and within this standard is established repair criteria based on a percentage of pipeline diameter. We are concerned that if geometric and TFI tool runs were to identify anomalies that resulted in calculated dents near this range, there is an increased probability of missing some significant number of anomalies that would otherwise need to be exposed and evaluated by using the higher baseline proposed by Olympic.

The Commission Pipeline Safety Division Staff appreciate the opportunity to review the Olympic Pipeline and the Consortium proposals as we work together to enhance environmental protection and public safety. We hope our comments are useful in your evaluation of the letter recently received from the Consortium on this same subject. If you have questions about our response, please contact me at (360) 664-1154.

Sincerely,

Douglas Kilpatrick, P.E.
Pipeline Safety Director

cc: Jeff Stahoviak
Steve Rieger
Gregg Zimmerman
Bob Eiber
Bobby Talley