

Reference No. Docket PG-031150

CERTIFIED MAIL

November 3, 2003

Don Larue
General Manager
Agrium U.S. Inc.
PO Box 5797
Kennewick, WA 99336-0618

Dear Mr. LaRue:

Subject: 2003 Natural Gas Pipeline Safety Inspection

The Washington Utilities and Transportation Commission (Commission) has the authority to enforce minimum safety regulations per Chapter 480-93 of the Washington Administrative Code (WAC) pertaining to the construction, maintenance and operation of pipelines transporting hazardous liquids in the state of Washington. In addition, the Commission adopts the Code of Federal Regulations (CFR) Title 49 Part 192.

On August 13th and 14th, 2003, Commission staff conducted an on-site standard inspection of the natural gas pipeline. The inspection included a review of records and an inspection of pipeline facilities.

Enclosed with this letter is the Commission report that summarizes the results of the inspection. Staff found two violations of state or federal pipeline safety regulations during the inspection. Staff would appreciate receiving your written response to the violations by December 5, 2003. The response should include a letter of intent indicating dates as to how and when full compliance will be obtained.

Agrium U.S. Inc.
Docket No. PG-031150
November 3, 2003
Page 2

Should you have questions or comments, please feel free to contact Joe Subsits at (360) 664-1322.

Thank you for your cooperation and interest in pipeline safety.

Sincerely,

Alan E. Rathbun
Pipeline Safety Director

Enclosure

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2003 Natural Gas Pipeline Standard Inspection Report
Agrium U.S. Inc.
Docket PG-031150

VIOLATIONS

An on-site inspection was conducted on August 13th and 14th, 2003, for the natural gas pipeline that connects to the Finley Plant. The following violations were noted as a result of the inspection:

1. **49 CFR Part 192. 605(b)(2) Procedural Manual for Operations, Maintenance and Emergencies**

*Each operator shall include the following in its operating and maintenance plan:
Procedures for controlling corrosion in accordance with the requirements of subpart I.*

In subpart I, 49 CFR 192.475(b)(2) states that when internal corrosion is found, pipe replacement must be made to the extent required by ASME/ANSI B31G or RSTRENG.

Findings:

There was no reference to ASME/ANSIB31G or RSTRENG found in the operations manual.

2. **49 CFR 192.605(b)(2) Procedural Manual for Operations, Maintenance and Emergencies**

*Each operator shall include the following in its operating and maintenance plan:
Procedures for controlling corrosion in accordance with the requirements of subpart I.*

In subpart I, 49 CFR 192.485 requires that general and local corrosion be evaluated and replaced in accordance with findings based on ASME/ANSIB31.G or RSTRENG.

Findings:

There was no reference to ASME/ANSIB31.G or RSTRENG found in the operations manual.