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Submitted to Darrin Ulmer via electronic mail at [Darrin.Ulmer@puc.idaho.gov](mailto:Darrin.Ulmer@puc.idaho.gov)

July 3, 2019

Mr. Darrin Ulmer  
Program Manager  
Idaho Public Utilities Commission  
PO Box 83720  
Boise, ID 83720-0074

Re: Response to IPUC letter dated June 7, 2019

Dear Mr. Ulmer:

In your letter of June 7, 2019, you documented two areas of probable violation discovered during the IPUC Pipeline Safety Records Audit on February 26 – 28, 2019. The probable violations pertain to a blowing gas incident that occurred on March 14, 2018 in Lewiston, Idaho and the subsequent Avista Incident Assessment that is dated April 2, 2018. Please find herein a restatement of the probable violations / findings and Avista's responses.

**Probable Violation #1:**

Avista was found out of compliance with 49 CFR §192.605(a) and (b)(9) as discussed herein:

**49 C.F.R. § 192.605 Procedural manual for operations, maintenance, and emergencies.**

- a) *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.*
- b) *(9) Taking adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapor or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and, a rescue harness and line.*

**Avista Utilities 2018 Gas Emergency and Service Handbook**

*Emergency Procedures 4.0 Emergency Procedures-Blowing or Uncontrolled Escaping Natural Gas*

### **General**

*Employees responding to natural gas emergencies shall be trained and qualified under current Company standards, and per any applicable State or Federal regulations. Such employees shall adhere to the following procedures in controlling emergency situations:*

- *Evaluate any emergency scene to assess the extent of any leakage or damage, and to determine what action is necessary to safeguard life first and then property (such as other utilities that can cause an immediate hazard). Evaluation actions shall include the use of a combustible gas indicator that is capable of indicating percentage gas in air readings.*

### **Avista Response to Probable Violation #1:**

1. Avista concurs that company personnel did not meet the requirements of §192.605(a) and (b)(9) specifically the company did not follow its own procedures found in Gas Emergency Service Handbook, Section 4, Sheet 1 as noted above.
2. Upon completion of a formal Incident Assessment, the following corrective actions and additional trainings were accomplished:
  - In May 2018, the Director of Gas Operations personally met with each of the Idaho gas operations districts to emphasize company expectations regarding emergency response and safe practices
  - The Avista Incident Prevention Manual (IPM) Section 7.7 Gas Worker Protection was reviewed and updated as of February 2019 to provide enhanced guidance for personnel responding in the Immediately Dangerous to Life or Health (IDLH) environment
  - The aforementioned updates to IPM Section 7.7 were presented by the Director of Gas Operations and the Manager of Gas Compliance during 2019 OQ Refresher to emphasize Avista's commitment to worker safety
  - Incident Command Training was added to OQ Refresher in 2019 and will be trained annually moving forward
  - Enhanced training on recognizing the need for and proper use of the Self Contained Breathing Apparatus (SCBA) was provided during the 2019 OQ Refresher sessions

### **Probable Violation #2:**

Avista was found out of compliance with 49 CFR §192.615(c) as discussed herein:

*(c) Each operator shall establish and maintain liaison with appropriated fire, police and other public officials: (1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency; (2) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency; (3) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and (4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.*



**Avista Response to Probable Violation #2:**

1. Avista concurs that the company did not meet the requirements of §192.615(c) and specifically the company could not show each Idaho construction office had maintained the appropriate liaisons and documented the meetings.
2. Moving forward, Avista will require each construction manager to annually complete a Capabilities Survey with their applicable first responders. Additionally, each manager will be required to keep documentation of Public Safety Liaison Meetings up to date and accurate.

Respectfully Submitted,



Michael J. Faulkenberry  
Director, Natural Gas  
MJF/rkb

Enclosure – Avista Incident Prevention Manual

Cc: Paul Good, Compliance Manager  
IPUC Correspondence File



