

# INTERMOUNTAIN GAS COMPANY

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IDAHO PUBLIC UTILITIES COMMISSION

December 20, 2019

Mr. Darrin Ulmer  
Pipeline Safety, Program Manager  
Idaho Public Utilities Commission  
P.O. Box 83720-0074  
Boise, ID 83720-0074

Subject: Response to November 26, 2019 Letter of Concern – Star, Idaho (Report # 1201911)

Dear Mr. Ulmer,

This letter is intended to address the November 26, 2019 Letter of Concern issued by Idaho Public Utilities Commission (IPUC) as a result of the November 22, 2019 construction inspection of Intermountain Gas Company's (IGC) project 367-0333 located at W Beacon Light Rd & N Wind Rd in Star, Idaho for the Trident Ridge Sub No 1.

## ITEMS OF CONCERN

**1. 49 CFR §192.605(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. 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.

**2. Standard Operating Procedures 4027 – Plastic Qualifications and Joining**

**JOINING OF PLASTIC PIPE**

**2.1. BUTT FUSION**

2.1.6 The surface temperature of the heating tool faces shall be in accordance with manufacturer recommendations. The heating tool shall have a built-in thermometer. Pyrometers are the preferred method to assure proper heating tool face temperature.

**Finding:**

During the inspection it was noted that the Track Utilities crew, employed by IGC, were using uncalibrated contact pyrometers to check the temperature of the heater plate used for butt fusions as required by IGC and manufacturers recommendations.

Cooper-Atkins suggests a one (1) year calibration interval. The calibration interval can be adjusted and should be chosen based on factors such as amount of use, severity of handling, and environmental conditions. The interval can be adjusted as a history of the thermometer's performance is developed. We do suggest however, that the measuring system (thermometer and probe) be periodically verified at known temperature points to ensure that the thermocouple itself has not changed or been damaged during use.

## Intermountain Gas Response

IGC acknowledges that the Track Utilities crew referenced in the IPUC finding did not have a calibrated pyrometer. IGC also acknowledges that the heating iron used was in excess of the 510° F maximum heating surface temperature allowed per the *Fusion Procedures for Joining PLEXCO® Polyethylene Pipe and Fittings* currently utilized by IGC. As such, IGC required Track to cut out and replace the butt fusions installed on project 367-0333. The removed 4" butt fusions passed visual inspection. There was one 2" butt fusion replaced. It failed visual inspection due to improper alignment and poor melt bead, issues unrelated to temperature. To further validate the quality of the fusions installed

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by the Track crew, on December 2, 2019, IGC returned to the previous project installed by the Track fuser. Two randomly selected butt fusions were removed and tested. Each butt fusion successfully passed visual inspection and destructive testing. The visual inspection was witnessed by Bruce Perkins. Lastly, because the tested fusions passed visual and destructive testing, IGC did not revoke the Track Utilities employee's operator qualifications.

It is important to note that butt fusions are pressure tested at a minimum of 90 psig, or 1.5 times the 60 psig maximum allowable operating pressure (MAOP). This strength test occurs prior to placing plastic pipelines into service. IGC standard operating procedure 4027 – *Plastic Qualifications and Joining* requires an electrofusion or mechanical connection when joining production plastic pipe to in-service plastic pipe. In other words, the final production to in-service connection (i.e. "tie-in") may not be butt fused. Because tie-ins are leak tested with soap, this requirement further ensures butt fusions are strength tested via a pressure test.

Please note that IGC is changing to TR-33, the Generic Butt Fusion Joining Procedure for Field Joining of Polyethylene Pipe. IGC's Technical Training department will conduct the revised training and operator qualification for company and contractor personnel who perform plastic joining during the month of February 2020. Once personnel receive training and a performance evaluation, they will begin using TR-33 exclusively. For the month of February, it will be important to note that personnel who are pending training will still be performing butt fusions with the PLEXCO® procedures.

Please contact Josh Sanders at (701) 222-7773 with questions or comments.

Respectfully Submitted,



Pat Darras  
Vice President, Engineering & Operations Services  
Intermountain Gas Company