

INTERMOUNTAIN GAS COMPANY

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IDAHO PUBLIC UTILITIES COMMISSION

December 31, 2019

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

Subject: Response to December 23, 2019 Notice of Probable Violations – Boise District (1201913)

Dear Mr. Ulmer,

This letter is intended to address the December 23, 2019 Notice of Probable Violations regarding the onsite construction inspection of project 19IGC-1063 located at Cloverdale and Kittredge Drive in Boise, Idaho conducted by the Idaho Public Utilities Commission (IPUC) on December 20, 2019.

PROBABLE VIOLATIONS

1. **§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. 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 (SOP) 4027 – Plastic Qualifications and Joining**
JOINING OF PLASTIC PIPE
 - 2.1. BUTT FUSION
 - 2.1.3. 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(s):

During the inspection the IPUC inspectors had observed a Dasco crew performing fusions on a new 6” PE pipe install. While observing the fusing crew the inspectors noticed that the Dasco fuser was not checking the iron temperature prior to performing each fusion as per Plexco bulletin no. 105Y requirement. Prior to the next fuse the inspectors asked the employee to show them what the temperature of the iron was set to, the Dasco employee then got the pyrometer out and checked the temperature and it was reading between 448-450 degrees. The required temperature for butt fusion is 500 + or – 10 degrees per Plexco bulletin no. 105Y requirement. At the time, the IPUC inspectors contacted IGC leadership.

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC stated above. On December 20, 2019 a Das-Co of Idaho crewman was fusing 6” pipe at 450 degrees with a manual McElroy Pit Bull Fusion Machine.

EXECUTIVE OFFICES

INTERMOUNTAIN GAS COMPANY

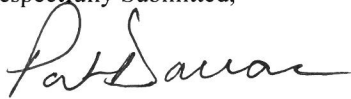
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The fuser mistook the temperature requirements for a manual machine (500 degrees) with the requirements for a hydraulic machine (450 degrees). Following notification from the IPUC, IGC district management and the Das-Co of Idaho superintendent met with IPUC staff on-site. The job site was made safe and was promptly shut down. In response to this occurrence, the plastic joining qualifications of the Das-Co of Idaho fuser and foreman were effectively revoked. The Das-Co of Idaho employees' qualifications will be reinstated following re-training.

It is important to note that butt fusions were removed and tested during the installation and inspection of project 19IGC-1063. Because each removed strap successfully passed visual and destructive testing and because the 450 degree temperature is within the parameters of TR-33, the Generic Butt Fusion Joining Procedure for Field Joining of Polyethylene Pipe, IGC believes the quality of the joints was not affected by the temperature error. Additionally, the fusions will be pressure tested at a minimum of 90 psig prior to being placed into service.

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

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Pat Darras". The signature is fluid and cursive, with a large initial "P" and "D".

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