

Appendix K

Frank Imhof, IMCO - Interview Transcript

Pipeline Rupture and Fire
Bellingham, Washington
June 10, 1999
DCA-99-MP-008

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UNITED STATES OF AMERICA
NATIONAL TRANSPORTATION SAFETY BOARD

Re: OLYMPIC PIPELINE COMPANY;)
Pipeline Rupture and Fire,)
June 10, 1999, Bellingham,) DCA-99-WP-008
Washington.)

INTERVIEW OF FRANK IMHOFF

August 16, 1999
Bellingham, WA

APPEARANCES:

ALLAN C. BESHORE, P.E. NTSB Pipeline Investigator 490 L'Enfant Plaza East, S.W. Washington, D.C. 20594-2000	FRANCIS S. FLOYD Floyd & Pflueger Attorney for Imhoff & IMCO 2505 Third Avenue, #300 Seattle, WA 98121-1445
DOUGLAS D. BEU Operations Manager Olympic Pipeline Company P.O. Box 1800 Renton, WA 98057	
RON HOLCOMB Spill Response Team Department of Ecology P.O. Box 47775 Olympia, WA 98504-7775	

REPORTED BY: AMY SMELTZER, CSR
CSR #SM-EL-TA-L278CJ

August 16, 1999

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(Exhibits retained by Allan Beshore.)

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BE IT REMEMBERED that the interview of FRANK IMHOFF was conducted on August 16, 1999, at the hour of 9:15 a.m., at 126 Kellogg Road at the Days Inn, Bellingham, Washington, before AMY SMELTZER, CSR, a Certified Shorthand Reporter and Notary Public in and for the State of Washington.

WHEREUPON, the following proceedings were had and testimony given, to-wit:

FRANK IMHOFF, called as a witness in the above-entitled cause and testified as follows:

QUESTIONS BY MR. BESHORE:

Q. Frank, I just want to introduce myself. For the record my name's Allan Beshore. I'm the lead investigator for National Transportation Safety Board looking into the pipeline rupture and fire that occurred in Bellingham on June 10th. I want to thank you for coming in today and answering some questions we might have for you about IMCO's work that was done back in the '90s.

Just because the other gentlemen are here at the table - you already met them - but I want them to introduce themselves also for the record since they'll be answering -- asking you some questions also.

MR. BEU: Doug Beu, Olympic Pipeline

1 operations manager.

2 MR. HOLCOMB: I'm Ron Holcomb, Washington
3 State Department of Ecology investigator on the
4 incident.

5 Q. And Frank, you have a representative with you here also
6 if you could identify yourself.

7 MR. FLOYD: I'm Francis Floyd with Floyd
8 & Pflueger in Seattle, and I represent Frank and IMCO
9 in this matter.

10 Q. Frank, if you could just state your full name, please.

11 A. Frank Imhoff.

12 Q. And you're the --

13 A. I'm the president of IMCO General Construction.

14 Q. What's the address for IMCO?

15 A. 4509 Meridian Street.

16 Q. And that's in Bellingham?

17 A. Yes.

18 Q. And the phone?

19 A. 671-3936.

20 Q. Thank you. If we could just kind of start maybe and go
21 back, Frank, and just if you could go back and kind of
22 describe to us when IMCO became involved in the
23 modifications or additions to the water treatment
24 facility and just kind of go through that process as
25 best you can remember.

1 A. We were awarded a contract, which we were low bidder.
2 It was bid by the City of Bellingham. And I believe it
3 was awarded in '94. And it was to install piping and a
4 new pump station in the City of Bellingham.

5 Q. So you first got an invitation to bid or was there --
6 is that a public process where they --

7 A. Yeah, a public bid.

8 Q. So then you reviewed the -- were you the one that
9 prepared the bids and reviewed the specifications for
10 IMCO?

11 A. I don't know.

12 Q. You don't recall?

13 Just in terms of the contract -- well, so your
14 part of the work was to install the -- it included
15 several phases. One of them was building the pump
16 station, correct?

17 A. Yes.

18 Q. And the installation of some water pipelines; is that
19 correct also?

20 A. That's correct.

21 Q. And what pipelines did that include; do you recall?

22 A. No.

23 Q. Did that include a 72-inch water line?

24 A. Probably.

25 Q. Did that include a 24-inch discharge water line that

1 tied into an existing pipeline at the pump station?

2 A. I believe so. I think there was a -- without a set of
3 drawings, I guess I'm not -- I mean, this was how many
4 years ago?

5 Q. It was in '94 so it's five, six years ago. Well, yeah,
6 we've got a couple of drawings. Maybe that will help
7 refresh your memory.

8 This one here is kind of busy, but this is just a
9 blow-up basically of that one. Feel free to look at
10 those for a moment if you want to and familiarize
11 yourself with them. This is kind of -- isn't that just
12 a blow-up, Doug, of the other one?

13 MR. BEU: Yeah, just a blow-up.

14 Q. So it's a little easier to read. This was the 24-inch
15 pipeline I was referring to that's clouded here in this
16 print here, the blow-up print, with the tie into the
17 existing line. And here's the 72-inch water line that
18 I was referring to. So if you want to look at those
19 for a moment.

20 A. Yeah, this is not the original drawing of the bid. I
21 don't know what this is. This shows revisions made.

22 Q. So that's not the bid document?

23 A. Uh-uh. We did build this pump station. We did put
24 this pipe in, 72, 16 inch. That's a bypass and pipes.
25 This is your incoming pipe to your pump station. This

1 is your discharge pipe.

2 Q. And then you tied the discharge into the existing 16
3 inch?

4 A. Yes. This is a 24-inch discharge, which ties in
5 through a tee into a 16 inch with reducers. So the
6 24-inch tee reduces to 16 inch and makes it tie into
7 the existing pipe.

8 Q. And we'll label these as exhibits. The blow-up we'll
9 call Exhibit A. And the 11 by 17, the site plan,
10 that's a little smaller we'll call Exhibit B.

11 Now, when you went out on -- when we when out the
12 other day and met on the site, you looked around. Did
13 some of that help to jog your memory also of how things
14 were arranged? Was there anything that struck you as
15 unusual based on looking at the print versus what was
16 out there?

17 A. Struck me as unusual?

18 Q. Well, was there anything that was substantially
19 different than what you remembered in terms of the
20 piping arrangement?

21 A. Well, I wouldn't -- I'd remember very little of it
22 without looking at drawings.

23 Q. Okay. Let's talk about the specifications. Well,
24 let's talk a little bit about did you have any
25 interaction with anyone from Olympic Pipeline during

1 this construction project?

2 A. If you're asking did I personally, I don't believe so.

3 Q. Are you aware of whether there was any contact with

4 them by any of your employees?

5 A. I believe there was.

6 Q. Are you --

7 A. Yes.

8 Q. Are you aware who that might have been from your

9 employees?

10 A. It was probably my superintendent, on-site

11 superintendent.

12 Q. Who would that have been?

13 A. Greg Burress.

14 Q. Are you aware if anybody else had any interaction with

15 Olympic?

16 A. No.

17 Q. During the course of the construction, did you -- did

18 anybody have any discussions with you about possible

19 damage to any facilities at the water treatment plant?

20 A. No.

21 Q. So nobody brought anything like that to your attention

22 or had any conversation with you?

23 A. When you're saying -- nobody had any conversations with

24 me, no, that's correct.

25 Q. Let me back up a little bit here and help out, maybe

1 clarify because I'm not talking just specifically about
2 the gasoline pipeline and Olympic's pipeline at this
3 time. I'm talking about other -- any damages that you
4 might remember during the project that came up.

5 A. Nothing I recall.

6 Q. And then specific to a gasoline pipeline, there was not
7 any discussions that you're aware of about any
8 potential damage?

9 A. No.

10 Q. In terms of the specifications, let me ask you a
11 hypothetical, I guess. If some damage had occurred,
12 what would the process have been? What would you
13 expect your operator to do? What would you expect your
14 superintendent to do?

15 A. Well, if there were damage, I would -- it depends on
16 what was damaged. Our superintendent if there was
17 damage to the water lines would consult with the
18 inspectors on-site and come up with a plan to repair
19 it.

20 Q. I'm sorry. Go on.

21 A. Well, that's --

22 Q. In terms of the gasoline pipeline if there had been
23 some damage that occurred to it, what would you expect
24 your operator to do in that circumstance?

25 A. Well, they would consult with the inspectors on-site

1 and a plan to repair it would be developed.

2 Q. By the inspectors are you talking about Barrett's
3 people or Olympic's people? What would you expect?

4 A. Well, it would depend on what was damaged. If there
5 was damage to city water lines, it would be Barrett's
6 people. And if it was damage to property owned by
7 Olympic, our communication would be through Barrett's
8 who would be consulting with other inspectors
9 throughout their --

10 Q. Well, that's what I was getting at. So you would
11 expect them to bring it to Barrett's attention?

12 A. Yes. We would not be taking direction from our
13 contractors between IMCO, the city. So if we took
14 direction, it would be from Barrett who was the City's
15 representative to perform inspection and direct us in
16 -- I mean, they inspect the work we do, make sure it's
17 done per contract and they approve it as we proceed.

18 Q. Here again this is just if there were damage that were
19 done, would you expect to be informed of that
20 personally?

21 A. I would expect to, yes, that I would hear about it,
22 yes.

23 Q. How large a company is IMCO? I'm just trying to get a
24 feel for --

25 A. At that time we were probably 23,

1 25-million-dollar-a-year company.

2 Q. And how many employees would you have had at that

3 point?

4 A. Hundred.

5 Q. Hundred employees?

6 A. Yeah.

7 Q. So you're a pretty good size.

8 A. Hundred to 120.

9 Q. So that's a lot of projects you've got going on at one

10 time?

11 A. Yeah.

12 Q. Do you recall, Frank, was there any -- what kind of

13 coating was applied to the water lines; do you recall?

14 A. Well, I was just looking at those photographs. There

15 was polyethylene bags. It's a poly cover that goes

16 over the water line.

17 Q. Do you recall if there was any Mastic products, you

18 know? Do you know what I'm referring to with Mastic?

19 A. Yeah, I know what you're referring to. No, I don't

20 believe there was.

21 Q. So you don't believe there was any Mastic products used

22 or specified?

23 A. Uh-uh.

24 Q. In terms of your personal involvement in the project,

25 how often would you say you had an opportunity to go by

1 and see the site?

2 A. Probably three times a week.

3 Q. Did you attend the construction meetings on a regular
4 basis?

5 A. Some of them, some of the meetings. I don't recall how
6 many.

7 Q. Do you recall ever seeing Olympic's gasoline pipeline
8 exposed during any of your tours?

9 A. I don't recall specifically.

10 Q. Well, when you went out to visit the site, did you
11 generally just -- how long would you spend at a given
12 -- it's kind of a general question I realize.

13 A. An hour.

14 Q. An hour? So you try to get out there and see the
15 excavation work and the field part of it, not just
16 visit with the office folks or whatever?

17 A. Oh, yeah.

18 Q. And you mentioned Greg Burress was the site
19 superintendent. Do you recall operators that worked
20 out on the site that --

21 A. Names of operators?

22 Q. Yeah, names of operators that might have excavated in
23 this area.

24 A. No, I don't recall who the operators were. I believe
25 Cal VanderPol was one of my guys that did operate on

1 that job site.

2 Q. And is he still an IMCO employee?

3 A. Yes. And I don't know who else was an operator. I
4 could guess, but I don't know. And in fact, I went
5 downtown and looked at some records at the City because
6 the job required certified payroll reports. And there
7 were a bunch of those reports that were missing. Some
8 of them were there. That was the purpose I wanted to
9 do was to see who did operate.

10 Q. And you were unable to locate those records?

11 A. No. Some of them were there and then some of them were
12 missing. Somebody may have those. You could see.

13 Q. Would you retain copies at IMCO?

14 A. No, we don't have copies. We don't have -- we don't
15 have our job files.

16 Q. Oh. Did --

17 A. Well, we've thrown them out.

18 Q. So you purge them periodically and this was over --

19 A. Yeah.

20 Q. -- a certain length of time old?

21 A. Over a couple years old. We threw that stuff out.

22 Q. In terms of operators, do you -- I mean, are your --
23 did you subcontract out any of the excavation work
24 during this project if you recall?

25 A. I don't think so.

1 Q. In terms of operators, do you use, I guess, company
2 employees or would you have, you know, picked somebody
3 up out of the union hall for a couple days or do you do
4 that kind of thing or do you recall?

5 A. They would have been company employees.

6 Q. So --

7 A. Because we are an open shop. We don't hire through
8 union.

9 Q. So you're a nonunion operation?

10 A. Yeah.

11 Q. But I mean, would you do that routinely or is that --
12 would that be unusual to have to hire somebody just
13 temporary like that?

14 A. It would be unusual. It was somebody that's worked for
15 us prior to this and came in for this work.

16 Q. And in terms of -- let's go back to Calvin here as far
17 as -- VanderPol. So he's been there at least since
18 this project so the last five years?

19 A. Yeah.

20 Q. How long was he with IMCO prior to this project?

21 A. Probably ten years.

22 Q. So a total of about 15 years he's been with you?

23 A. Yeah, I think so at least.

24 Q. So would you consider him to be a good operator?

25 A. Yeah.

1 Q. Is he one of your better ones?

2 A. Yeah.

3 Q. In terms of damages, I guess, in this project - and I'm
4 talking about all damages to any facilities or whatever
5 the case may be - does this project stand out as one
6 that there's maybe more problems than some other
7 projects?

8 A. It doesn't stand out that way, no.

9 Q. Did the project go fairly smooth?

10 A. I don't recall how smooth it went. I really don't.

11 Q. Was there any litigation that came about, --

12 A. No.

13 Q. -- anything like that?

14 A. No.

15 Q. Do you recall if the bid had performance incentives, I
16 guess, or on the other side deadlines with penalties
17 involved or do you recall?

18 A. I'm sure it had a contract completion date and it had
19 liquidated damages. All Public Works contracts do.

20 Q. Well, do you -- was this job finished? I mean, was it
21 finished ahead of schedule? Was it a bump on the
22 schedule?

23 A. I don't recall.

24 Q. Did you pay liquidated damages?

25 A. I don't know.

1 Q. And I just want to go back. I know I already asked you
2 this, but you had no personal interaction with Olympic
3 --

4 A. No.

5 Q. -- if I understood you correctly?

6 Is there anything else that you can think of that
7 you can share information with us that might help us
8 out here on investigating what happened?

9 A. I'd like to go to the bathroom maybe.

10 MR. BESHORE: Let's go off the record.

11 (Off the record.)

12 Q. Frank, you were just mentioning that you thought that
13 you had a vague recollection maybe of where the lines
14 might have -- or the gasoline line, Olympic's line,
15 might have been exposed.

16 A. Well, I recall the gasoline line being exposed in this
17 area (indicating), which would be the northwest of the
18 pump station and --

19 Q. And that would be in the vicinity of where the suction
20 line --

21 A. Yeah, the intake to the pump station, which I believe
22 the intake goes underneath the gas line. So that's why
23 it was exposed in that area because we had to actually
24 uncover that pipe --

25 MR. FLOYD: Just so the record's clear,

1 it's not in the area where there was -- the explosion
2 occurred because of the rupture?

3 MR. IMHOFF: No, not at all. It's north
4 of that.

5 Q. North of the rupture where the --

6 A. Yeah.

7 Q. -- or I guess the intake to the pump station where that
8 line crosses. You think that line's actually
9 underneath the gasoline pipeline?

10 A. I think so. I believe one of the -- you've got a
11 24-inch ductile iron pipe, and we've got a four-inch
12 PVC chemical goes through there. And there's another
13 eight-inch PVC utility duct in this area. I don't have
14 the rest of the -- these drawings are not complete
15 where they give me elevations, but I believe one of
16 those three pipes went underneath that. It was
17 probably this 24-inch intake.

18 Q. Let's go to the pictures. These are pictures that were
19 previously labeled as Exhibit A to Mr. Franklin's
20 interview on July 14th. But maybe some of these
21 pictures might help. Here on page eight on the left
22 side of the page, left photograph, is that the intake
23 line you're referring to?

24 A. I believe it is. I believe it is, these two existing
25 pipes. This is this area (indicating).

1 Q. So perhaps one of those exposed pipes is the gasoline
2 pipeline?

3 A. Yes.

4 Q. We'll get some further detail from Greg. He might --
5 there's another photograph of it on page nine. But you
6 don't recall or do you recall specifically seeing that
7 during one of your visits or what it might have looked
8 like?

9 A. No. We've built 70 jobs since then. I just -- if I
10 did, it would be -- I don't recall something specific
11 without looking at the documents and -- no.

12 Q. Now, did you guys do the concrete? There were some
13 thrust blocks installed around this valve here --

14 A. Yes.

15 Q. -- where the 24-inch tied into the existing 16 inch.

16 A. Yes.

17 Q. Did you guys do those thrust blocks yourselves or is
18 that something you would have subcontracted out?

19 A. I don't recall. I would say we probably did it
20 ourselves.

21 Q. And --

22 A. You also asked me another question that I want to
23 comment on.

24 Q. Okay.

25 A. When I was out there that day, you said did I see

1 anything that struck me unusual and I did. And what
2 struck me the day we were out there was that this pipe
3 was laid in a very rocky area with no bedding.

4 MR. FLOYD: When you say "this pipe,"
5 what type of pipe are you talking about?

6 MR. IMHOFF: Well, the pipe in this area,
7 the gas line.

8 A. And I know, you know, the work we do, a lot of work,
9 the pipeline work, everything's required to be bedded
10 especially any time it's in a rocky area.

11 Q. Did you guys use any kind of imported fill on this job?

12 A. Probably, yeah. I'm sure we did. I'm sure this pipe
13 was bedded.

14 Q. The 24 inch?

15 A. It may not have been. I shouldn't say I'm sure. I
16 would guess it was. I know some of this pipe was
17 bedded, but I couldn't tell you specifically what was
18 and wasn't.

19 Q. But when you went out and looked around, you remember
20 there being blocking and there was something --

21 A. Yeah.

22 Q. Frank, I don't think I have any more questions at this
23 point.

24 MR. BESHORE: Doug, do you have any
25 questions for Frank?

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MR. BEU: No, I don't have any.

MR. BESHORE: Ron, do you have any?

MR. HOLCOMB: Yeah, I do. Ron Holcomb, Department of Ecology. I appreciate your time here today, Frank.

QUESTIONS BY MR. HOLCOMB:

Q. Has your company done any other jobs that you're aware of where you've had to excavate around specifically Olympic Pipeline or, say, Transmountain Pipeline?

A. If we have, I couldn't tell you specifically.

Q. So maybe --

A. We have possibly.

Q. Possibly, okay.

Would that be something, I guess, that would make the project a little more complex than a typical --

A. Definitely. Our people -- everybody I've talked to that worked for me on this project and I remember at the time we were very concerned with working around a gas line. There was no -- I mean, it wasn't a secret that that pipe was there. We were very -- safety's a big deal with our company. We were aware that was there. Those guys were all very concerned about it. I think it was probably one of their big concerns is that they were working around a live gas line.

1 Q. Were there any specific procedures or practices that,
2 you know, going into the project that, "Okay, we know
3 we've got this gas line" that you would do, I guess,
4 somewhat differently than a normal construction job?

5 A. I'm sure there were. There were procedures that we
6 discussed in our weekly safety meetings about exposing
7 and working around a gas pipe.

8 Q. Do you remember anything specific?

9 A. I remember specifically that the contractors required
10 any time we work near the pipe that we have inspectors
11 from Olympic on-site. The City was required to have
12 those people out there. We always had a City inspector
13 there, and we always had a Barrett engineer inspector
14 there.

15 Q. But any time you worked around the Olympic pipeline,
16 any time it was close --

17 A. Any time we got near, remotely close, yes.

18 Q. You indicated that you did go out there approximately
19 three times a week just to check on it?

20 A. Yeah, I would guess. The reason I say that is I lived
21 in the area. I would kind of make it a point of going
22 by the job on a regular basis.

23 Q. I'll just ask you again. I mean, when you were out
24 there - I'm sure there was probably quite a few people
25 - but, you know, any way that you identified any

1 Olympic inspectors were there when you were there?

2 A. Not that I recall.

3 Q. You just can't remember.

4 You did mention that you checked the City, the
5 certified payroll, in looking for some of your folks
6 that worked on the project. You indicated some of the
7 records were missing, but I didn't get the impression
8 that all of them were. So you did get a chance to look
9 at some of them?

10 A. I think prior to -- it seemed like it was April 15th
11 after that that certified payroll records were missing.
12 And we -- I believe we still have some computer records
13 from people.

14 Q. The ones you were able to look at, though, is that how
15 you came that Calvin was maybe on that project or is
16 that --

17 A. He told me that and Greg Burress. And Greg will --
18 you're talking to Greg later today. I think he knows
19 another operator or two that was on that.

20 Q. You'd also indicated that standard practice would be if
21 there was damage that was caused as a result of, you
22 know, just construction activities that probably would
23 have been or should have been noted to you. Is that
24 what I understood you to say?

25 A. I would suspect that's what an inspector would do.

1 He's there for that purpose.

2 Q. You also indicated you don't recall anybody indicating
3 that there was any damage --

4 A. No.

5 Q. -- to anything?

6 A. No.

7 Q. So if --

8 A. Not at all.

9 Q. -- in the reports it indicated that, for example, a
10 fire hydrant was broken by a backhoe --

11 A. Oh, I think there was a fire hydrant broken by a
12 backhoe. I believe there was a water -- I believe we
13 broke a hydrant or a pipe. And I couldn't tell you the
14 area that was in.

15 Q. So now you do recall some damage?

16 A. Yeah.

17 Q. Any other?

18 A. In looking -- no, I don't recall any other. If there
19 was, I think Greg would recall it. He was on the job
20 all the time. I recall the hydrant because I remember
21 Cal and Greg saying that there was a hydrant that was
22 broken or a water line broken somewhere. And they can
23 tell you specifically where that was.

24 Q. What was your recollection of any relationship between
25 your folks out there and Barrett and the City as to how

1 things went?

2 A. I think it went fairly well. I think we had a good
3 working relationship with everybody. I don't think
4 there were conflicts. It was a difficult job. There's
5 no question about that. Just the way the thing was
6 designed was very difficult.

7 MR. HOLCOMB: Okay. That's it.

8 MR. BESHORE: I just have a couple
9 follow-up questions here.

10

11 QUESTIONS BY MR. BESHORE:

12 Q. In terms of the City's involvement, you mentioned the
13 City had an inspector out there. Did you guys report
14 at all directly with the City or through Barrett? I
15 guess --

16 A. Greg could tell you.

17 Q. And the number -- how many operators in terms of
18 equipment operators would you have had do you think at
19 that point in time?

20 A. In my company?

21 Q. Yeah. I mean, how many possible people might have been
22 out there operating during this period just an
23 approximation?

24 A. Could have been three or four, I guess.

25 Q. Because you had mentioned you had a hundred and some

1 employees and not all of them, of course, are
2 operators. I don't think --

3 A. Another thing that struck me unusual about this - I
4 just recalled that - is the way -- I was looking at
5 this tee that was removed after the fact. It was
6 laying out there on the job. And if you look at this
7 tee, you see a valve and then a reducer, flange
8 reducer. This pipe was broke off right in this area.
9 It was removed. And it almost looked like it was taken
10 out with a - I don't know - broke with an excavator.
11 It was bent up. It was a very crude job of removing
12 it, which I was very surprised at. I thought when this
13 thing was taken apart it would have been done very
14 carefully with kid gloves. And I would think the way
15 that would have been removed was you unbolt this,
16 remove it instead of breaking it off, banging it off.

17 Q. Okay.

18 A. It was real crude. And the other thing that just
19 struck me while I was saying this --

20 Q. Okay.

21 A. -- is had we, people who were working at IMCO, why
22 weren't we asked to participate when that was removed
23 at least as an observant because what I see is I don't
24 think it was carried out properly. I don't know who
25 was in charge of that operation.

1 Q. Okay. Anything else?

2 A. No.

3 MR. BESHORE: Ron?

4 MR. HOLCOMB: I've got one more thing
5 that came to mind.

6

7 QUESTIONS BY MR. HOLCOMB:

8 Q. Frank, there was that 72-inch water line that was
9 installed as part of this. And did that --

10 A. You're referring to this pipe (indicating)?

11 Q. Right. And it goes right over the Olympic line.

12 A. I believe it does. I believe this is Olympic's line
13 (indicating).

14 Q. Right.

15 A. Yes, it does.

16 Q. I'm just wondering at that time that that part of the
17 project was going on, I mean, a big pipe over the
18 Olympic pipe, do you recall activities around that time
19 especially if you went to the site maybe more often?

20 A. If I did, nothing that comes to mind.

21 Q. And any of the pouring of the CDF, whatever that is or
22 around there within the vicinity of the pipe, any of
23 that?

24 A. I don't recall that.

25 MR. HOLCOMB: Thank you, Frank.

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MR. BESHORE: I don't have anything further. Thank you, Frank.

(Exhibits A and B were marked for identification purposes.)

(Interview concluded 10:00 a.m.)

1
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3 CERTIFICATE

4 STATE OF WASHINGTON) I, AMY SMELTZER, CSR, a
5)SS Notary Public in and for the
6 COUNTY OF WHATCOM) State of Washington, residing
7 at Bellingham in said county
8 and state, do hereby certify:

9 That the foregoing interview of FRANK IMHOFF was taken
10 before me and completed on August 16, 1999, and thereafter
11 transcribed under my direction; that the interview is a
12 full, true and accurate transcript of the testimony of said
13 witness to the best of my ability;

14 That I am not a relative, employee, attorney or counsel
15 of any party to this action or a relative or employee of any
16 such attorney or counsel, and I am not financially
17 interested in the said action or the outcome thereof;

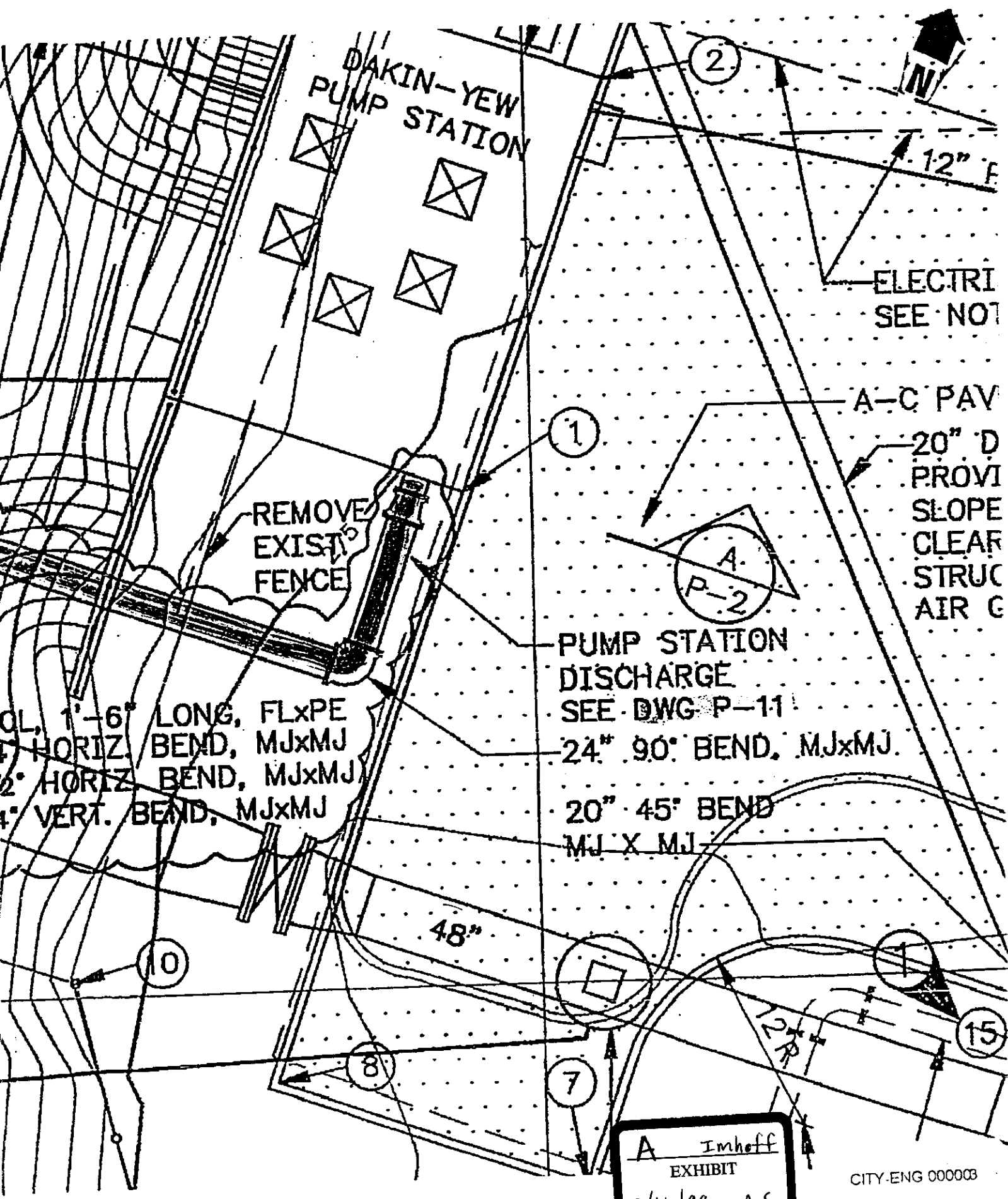
18 IN WITNESS WHEREOF, I have hereunto set my hand and
19 affixed my official seal this 18th day of August.



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Amy Smeltzer

Notary Public in and for the State
of Washington, residing at Bellingham.
My Commission expires Oct. 9, 2001.



DAKIN-YEW
PUMP STATION

ELECTRI
SEE NOT

A-C PAV

20" D
PROVI
SLOPE
CLEAR
STRUC
AIR G

REMOVE
EXISTING
FENCE

PUMP STATION
DISCHARGE
SEE DWG P-11

24" 90° BEND, MJxMJ

20" 45° BEND
MJ X MJ

1'-6" LONG, FLxPE
HORIZ. BEND, MJxMJ
HORIZ. BEND, MJxMJ
VERT. BEND, MJxMJ

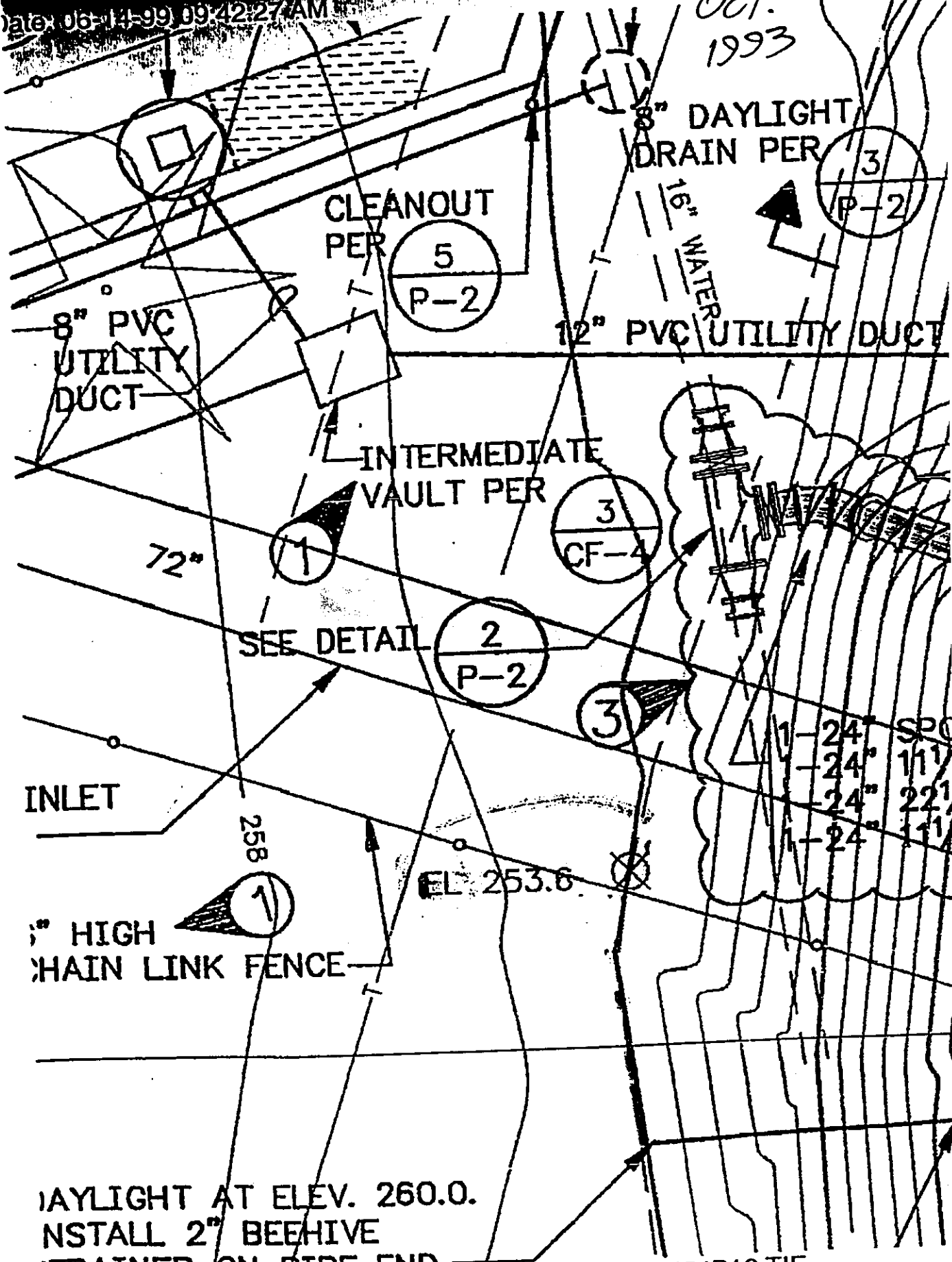
48"

A Imhoff
EXHIBIT
8/16/99 A.S.

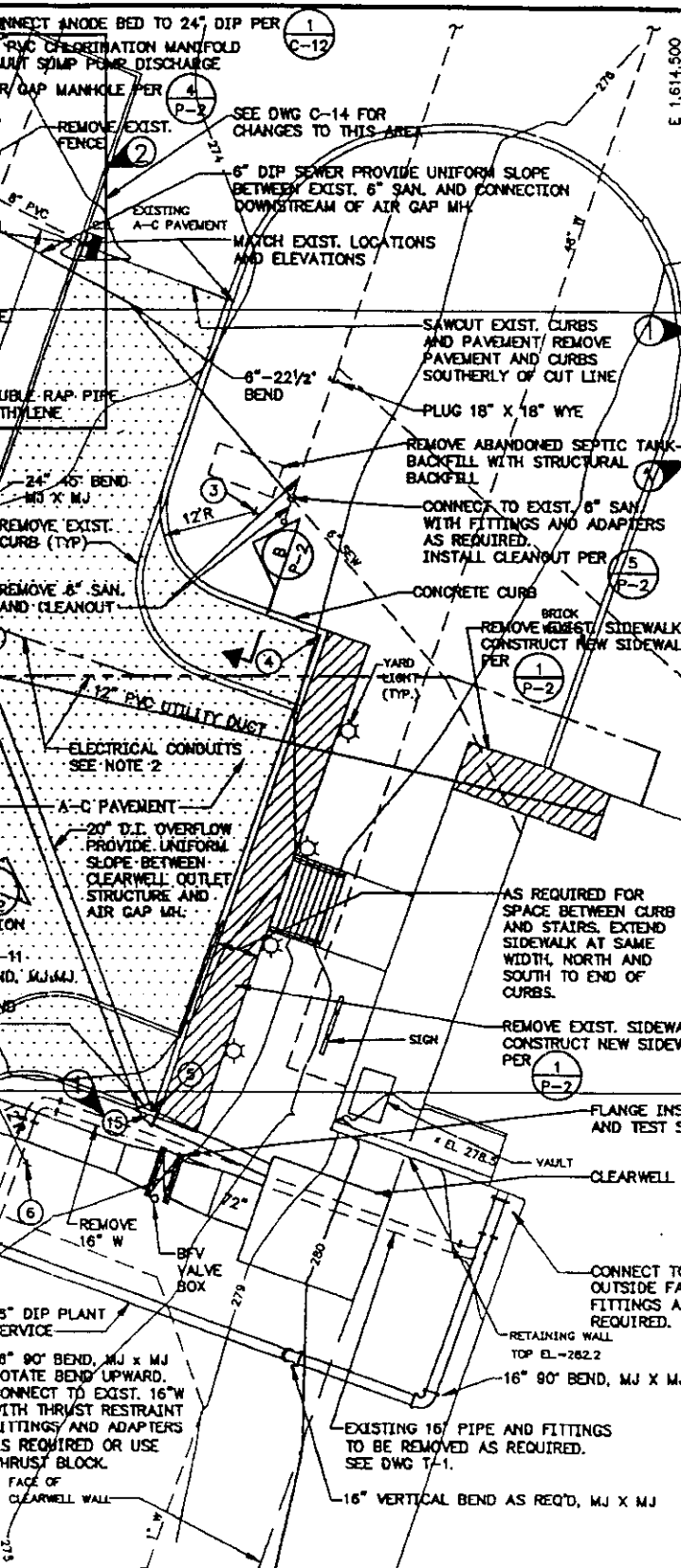
CITY-ENG 00003

Date: 06-14-99 09:42:27 AM

Oct. 1993



DAYLIGHT AT ELEV. 260.0.
 INSTALL 2" BEEHIVE
 TRAINED ON DTDC END



- NOTES:
- EXISTING LAWN SPRINKLER SYSTEM IS NOT SHALL REPAIR AND/OR REPLACE SYSTEM OR CONSTRUCTION TO RESTORE SYSTEM TO ORIGINAL CONFIGURATION PRIOR TO CONSTRUCTION.
 - ELECTRICAL CONDUITS PER E-3. INSTALL CONDUITS IN CONTROL DENSITY FILL BETWEEN GARAGE DOOR AND PUMP STATION HANDHOLES AND UNDERNEATH ALL ROADWAYS. PROVIDE 2" MINIMUM CONTROL DENSITY FILL AROUND ALL CONDUITS.
 - PROVIDE 1/4 INCH NYLON PULL ROPE IN EACH OF THE FIVE UTILITY DUCTS.
 - CONNECT 4" WATER TO 16" WATER WITH 4" DOUBLE STRAP TAPPING SADDLE AND 4" G.V.
 - HORIZONTAL AND VERTICAL LOCATIONS OF EXISTING PIPELINES ARE SHOWN AS BEST KNOWN AT THE TIME THIS DESIGN WAS PREPARED. ACTUAL LOCATION MAY VARY FROM THOSE SHOWN. THE CONTRACTOR SHALL PROVIDE ADDITIONAL PIPE AND FITTINGS AS NECESSARY TO CONNECT TO EXISTING PIPELINES AT ACTUAL LOCATIONS.
 - CONSTRUCT A CRUSHED LIMESTONE PATHWAY FROM THE PUMP STATION ENTRANCE DOOR TO THE CRUSHED SURFACING ROADWAY. PATHWAY SHALL BE 6' WIDE. CRUSHED LIMESTONE SHALL BE 4 INCHES COMPACTED THICKNESS. GRADATION OF CRUSHED LIMESTONE SHALL BE SIMILAR TO CRUSHED SURFACING TOP COURSE.

COORDINATE LISTING

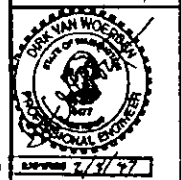
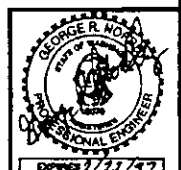
LOCATION NO.	NORTH	EAST	ELEVATION/COMMENT
1	842,831.55	1,614,395.68	273.1/S.E. COR. PUMP STA.
2	842,857.43	1,614,404.98	274.6/N.E. COR. PUMP STA.
3	842,874.8	1,614,445.7	RADIUS POINT
4	842,858.8	1,614,453.0	274.7 TOP OF PAVEMENT
5	842,797.5	1,614,432.5	275.9 TOP OF PAVEMENT
6	842,798.6	1,614,416.3	RADIUS POINT
7	842,787.1	1,614,392.5	275.8 TOP OF PAVEMENT
8	842,784.2	1,614,382.8	275.4 TOP OF PAVEMENT
9	842,780	1,614,375	CONNECT NEW FENCE TO EXIST. FENCE
10	842,801	1,614,370	NEW FENCE
11	842,825	1,614,298	NEW FENCE
12	842,850	1,614,280	NEW FENCE
13	842,862	1,614,280	NEW FENCE
14	842,914	1,614,388	E AIR GAP MANHOLE
15	842,797	1,614,432	20' 45" BEND
16	842,866	1,614,398	24' 45" BEND
17	842,928	1,614,389	24' 45" BEND

EXISTING CITY OF BELLINGHAM WATER TREATMENT PLANT

REMOVE EXIST. SIDEWALK. CONSTRUCT NEW SIDEWALK PER (1) (P-2)

CONNECT TO EXIST. 16" WATER OUTSIDE FACE OF WALL WITH FITTINGS AND ADAPTERS AS REQUIRED.

THESE RECORD DRAWINGS HAVE BEEN PREPARED BASED ON CONSTRUCTION RECORDS AND INFORMATION PROVIDED BY THE CONTRACTOR.

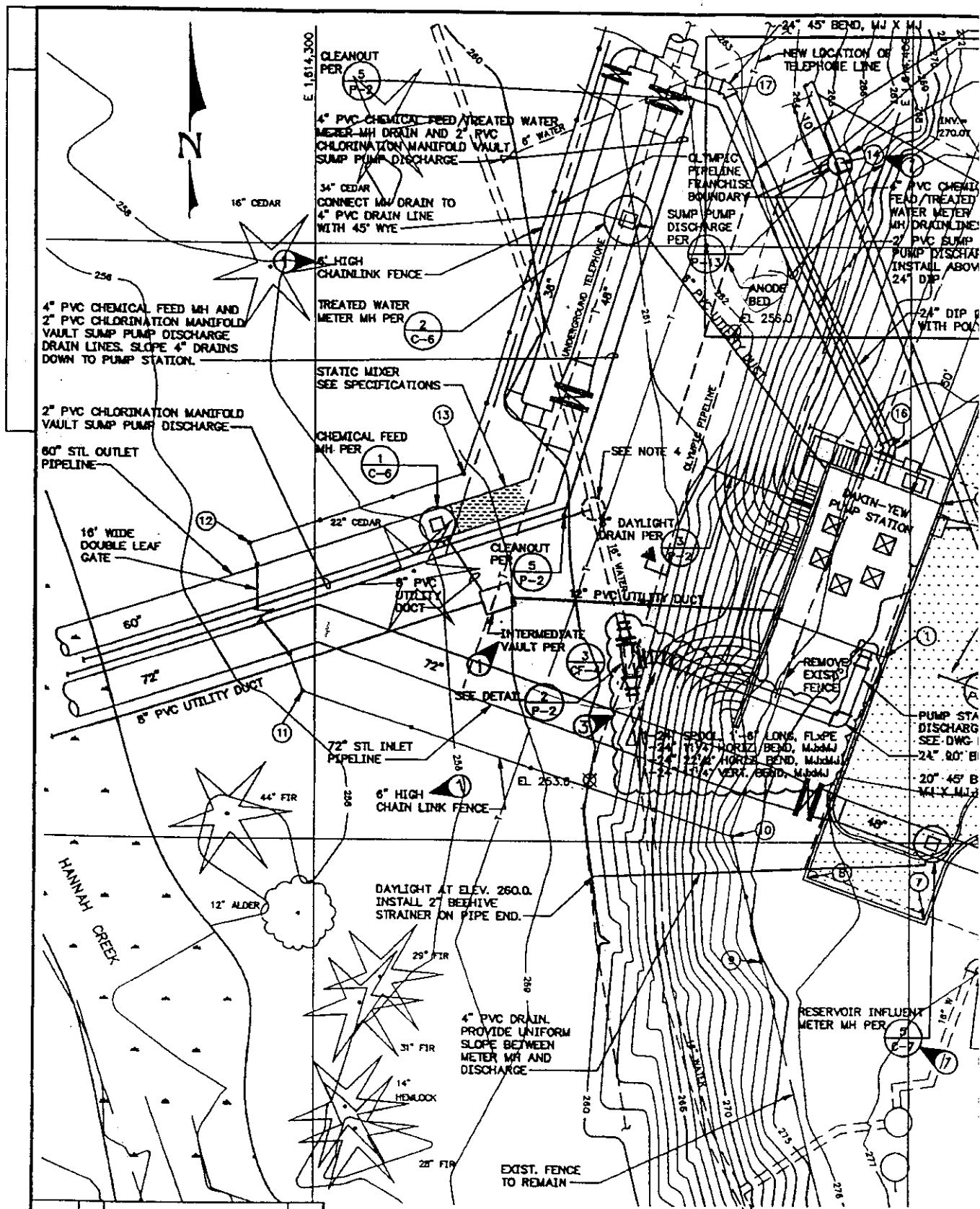


CITY OF BELLINGHAM
DAKIN YEW PUMP STATION,
RESERVOIR PIPELINES, AND CHEMICAL FEED

PUMP STATION SITE PLAN

DRAWING NO. P-1
SHEET NO. 16 OF 66

B Imhoff
EXHIBIT
8/16/99 A.S.



Date	No.	Description	By
3/13/84	3	REVISED PUMP STA. DISCHARGE PIPE	GRN
3/14/84	2	CHANGE ORDER NO.1, SEE DWG C-14	TC
1/21/84	1	ADDENDUM NO. 2	JMH

Designed	RD	Approved	
Drawn	MN	Scale	1"=10'
Checked	GRN	Date	OCT 1993
		Project No.	B152407

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