



## Energy Services Department

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Ref No. Docket PG-080110

### CERTIFIED MAIL

December 18, 2008

Mr. David Danner  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive, S.W.  
PO Box 47250  
Olympia, WA 98504-7250

Dear Mr. Danner:

**Subject: 2008 Standard Natural Gas Inspection – City of Ellensburg, Washington**

Thank you for the opportunity to comment on your letter of November 21, 2008 concerning the audit and inspection of the City of Ellensburg's natural gas system. Attached to this letter you will find a detailed response to the alleged violations found during the audit as well as the corrective actions taken by the City to address the issues raised.

The response contains several sections plus attachments. The first section deals with alleged violations which the City contends are not violations and lays out the basis for the City's position. Because the basis's of contention are similar for a large number of the violations, the layout of this section lists the basis for the City's position followed by a listing of alleged violations, in the order listed in your letter, to which the City feels the basis is applicable. It should be noted that a single alleged violation can be listed more than once if the basis is applicable. This section also lists any actions that the City has taken since the audit to enhance its program or to avoid future confusion over our codes and practices compliance with WAC and Federal Standards.

The second section of our response lists the alleged violations for which we are not in disagreement and the corrective actions that have been taken. This list is again in the order the alleged violations are contained in your letter. The third section is a table summarizing all the alleged violations and actions taken to correct or enhance our program. Finally, we have included a number of attachments (photo's and manufacture's information) to further support our responses.

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STATE OF WASH  
UTIL. AND TRANSP  
COMMISSION  
2008 DEC 23 PM 1:47

The City prides itself on its natural gas system and its workers. While we don't necessarily look forward to our annual audit we have been gratified in previous years by the comments from your inspectors and the generally positive nature of the audits. We feel that our system, while small, is second to none in terms of safety and regulatory compliance. This year's audit frustrated many of my people as many of the alleged violations that remain in your letter were refuted more than once with what we feel is compelling information. If this year's audit is to be the standard for future years we only ask that all natural gas utilities in the State be held to this same standard.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert J. Titus". The signature is written in a cursive, flowing style with some loops and flourishes.

Robert J. Titus  
Energy Services Director

## SECTION 1. FINDINGS FOR WHICH THE CITY FEELS NO VIOLATION OCCURRED

The City contends that a number of alleged violations are not or should not be considered violations. The basis's for these determinations fall under one or more of the following:

A) Cited WAC, CFR or City Procedure does not support Finding, B) Reasonable response time allowed to correct situation, C) Cited third party requirement not supported by third party; and or D) Interpretation of record keeping requirement in dispute.

### CITED WAC, CFR OR CITY PROCEDURE DOES NOT SUPPORT FINDING

2 a. – There is no requirement under WAC 480-93-015(2) to list details of the equipment being used while conducting a specific sniff test. Calibration records are kept for each of the City's testing instruments and records show that only calibrated units were on hand for the 1-22-08, 2-20-08, and 3-26-08 tests in question. [Note: although not required, to avoid future confusion test record forms have been modified to include the model and serial number of the instrument used.]

2 b. – There is no requirement under WAC 480-93-015(2) to list details of the equipment being used while conducting a specific sniff test. The presumption should be that it is not required under this WAC since a similar WAC, WAC 480-93-187(3), specifically calls for such record keeping for testing instruments. [Note: although not required, to avoid future confusion test record forms have been modified to include the model and serial number of the instrument used.]

4 a. i. & ii – There is no requirement to pressure test leaks that were not service damages resulting in interruption of gas supply. The cited examples were a service stub that was cut back and a leak on a steel pipe; neither of which constituted damage under the cited WAC nor was the gas supply interrupted.

5 c. i & ii. – Our procedures do not require pressure testing for leaking caps or capped off lines.

5 e i & ii. – A material ticket was attached to the leak repair report (both kept as part of our permanent record) (i.) and only a coupling was used (ii.) and our procedures do not require us to list zero pipe length.

5 f. ii.; 8 a. ii. – Both of these alleged violations reference a single event at a single location. There is no requirement to leak survey a leak on a steel pipe that was not caused by third party damage.

5 g. – The meter readers are not employed by the gas utility and work for a different department in the City. Roughly half of our meters are smart meters and are read from as much as a block away. There is no requirement to train third party, non-gas personnel not involved in any gas division work, subject to OQ requirements. There has never been any procedures for these personnel. [Note: The utility provided awareness information to the meter readers].

6 i. to iv.; 7 a. ii.; iv.; v.; – In all cited cases, the gas escape was caused by damage to the pipeline during excavation work. At all times the leak was confined to the excavation which was

further expanded to facilitate the repairs. [Note: to avoid future confusion, staff have been instructed to record excavation details on future reports.].

7 a. i. – This was an underground leak where the pipeline system was exposed in all directions for a considerable length. Photographs were taken showing the extent of all excavations where gas was detected. These photographs became part of the permanent record and more than adequately substitute for a sketch on the form.

8 b. i.; ii. – Both leaks were grade 2 leaks in steel pipe and in accordance with the City's CoP, Section 10.1.7, it was determined that a special leak survey was not required.

10 – The city responded to an indoor odor call and found no obvious cause. The gas worker noted on the form that it might have come from the gas vent. The inspector based the alleged violation on the gas workers supposition not on fact. The City carried out its own investigation and found no fault with the original positioning of the gas meter, regulator or vent. All were installed in compliance with all applicable WAC's and City procedures.

#### REASONABLE RESPONSE TIME ALLOWED TO CORRECT SITUATION

5 a. i. 1. & 2. & 5 b. 1, 2 & 3; 11 i.; 12 i. 1,2 & 3; 14 i. 1 a., b. & c. – The buried riser and meter at this location were found a few days prior to the inspection during our annual leak and corrosion survey and was noted for correction. The building owner partially covered our facilities with loose dirt while digging for an improvement to his building (photos in Attachments). Our facility's were installed and maintained in accordance with our procedures and the problem occurred as the result of a third party. The problem was noted for correction and as a non-emergency situation we were allowed to correct the problem well after the inspector decided that multiple possible violations existed. [Note: the building owner was notified of the issue soon after the inspection, the loose dirt removed, and minor spot corrosion fixed.]

5 a. ii. 1; 5 a. iii. 1. – Allegedly buried valve only partially buried by landscaping rock but is still accessible (ii.), and the addition of a second valve above an existing buried valve does not violate our procedures (iii.). [Note: although note required, to avoid future confusion a small wooden box was placed around the value to prevent buildup of landscaping rock (ii.) and in the second case (iii.) the entire service was replaced as part of a previously scheduled replacement program.]

5 a. ii, iii, iv.; 11 ii. & iii.; 12 ii., iii., iv.; 13 i., ii., iii.; 14 ii. – Buried pipe and fittings, and surface corrosion were discovered as part of the audit inspections and as such would be reported and remedial action carried out. It is not possible for the city to know of every requirement for corrective action. In many instances the Ellensburg CoP details timescales for remedial action. [Note: This work has been completed and all work was done within the allowable timeframes.]

9 ii. – The city cannot protect meters from every conceivable situation and can only correct issues of this kind following discovery. The building owner temporarily stored a stack of pallets in front of the meter. [Note: Barricades have been improved and owners informed of protection required – see photo in Attachments.]

### CITED THIRD PARTY REQUIREMENT NOT SUPPORTED BY THIRD PARTY

3 i. & ii. – The regulator installations did not go against manufacturer’s recommendations as there are no recommendations from the manufacturer’s of these regulators regarding the orientation of the vents. Copies of the manufacturer’s information (included in Attachments) show that vents can be ordered in any orientation. No regulation or, incorporated by reference, codes (ASME B31.8, etc.) dictate that regulator vents should face vertically down. [Note: although not required, to avoid future confusion the vents in question were re-oriented vertically down.]

### INTERPRETATION OF RECORD KEEPING REQUIREMENT IN DISPUTE

4 c. i. & ii. – Pipe replaced was recorded on attached paperwork for item i., and item ii. was the addition of a coupling and no pipe was used.

5 f. i., iii. & v. – A survey was carried out in accordance with our procedures and detailed on a leak repair report. [Note: although not required, to avoid future confusion staff has been directed to fill out a separate leak repair report form and to check off the recheck box.]

7 a. iii. – The leak repair report and the recheck do identify the magnitude and location of CGI readings.

8 a. i.; iii.; v. – Paperwork detailing the leak survey was available but was deemed inadequate because the staff member checked a box indicating the locations where gas had previously been detected had been retested and no trace of gas found. The City provides this box for rechecks and doesn’t require a new test form to be filled out. [Note: although not required, to avoid future confusion staff has been directed to fill out a separate leak repair report form and to check off the recheck box.]

### AREAS OF CONCERN

1. There is no confusion regarding these pressure indicators as the CoP states “Calibration not required – These are designated as “Pressure Indicators” – No monitoring, pressure settings or other readings are taken from these gauges.” The identified correction was the result of a conscientious worker checking the gauge as an additional enhancement to routine work. [Note: to avoid future confusion, the City has removed the correction factor label.]
2. The Drug & Alcohol Misuse Prevention Plan was reviewed and amended in line with recommendations received, but as the inspectors were informed at the time, this document had to get approval from the Union and the City Council. A duly approved copy was sent to the State a few weeks before the date of your letter. City government has to abide by its own rules and regulations in order to have the new document approved in the proper manner.

## SECTION 2. FINDINGS FOR WHICH THE CITY CONCURS

1 i. to v. – Meter badges with the City’s name were purchased and installed on all the meters found without a badge. [Note: we have added language to Section 9.5.4 of our CoP to add badges whenever meters are discovered in the field without badges. We will achieve 100% compliance within 5 years since we will visit every meter location on a 5 year cycle for our annual leak and corrosion survey]

2 a. – The sniff tests performed on 4-28-08, 5-30-08, 6-24-08 and 7-8-08 occurred during a time period when a testing instrument with an expired calibration date was on hand. We are certain that the calibrated testing instrument was used on those dates but we can offer no proof except for the word of the worker performing the test. [Note: although not required, to avoid future confusion test record forms have been modified to include the model and serial number of the instrument used.]

4 b. i. – We are certain that a soap test was performed but it was not noted on the leak repair report. [Note: this item was emphasized at a staff briefing on 12/9/08.]

5 a. ii. 2, iii. 2 & 3, iv. & v. – Coatings were missing or inadequate in these locations. [Note: all deficiencies have been corrected.]

5 d. i.; 5 f. iv.; 7 b. iii & iv.; 8 a. iv.; 8 b. iii to v. – All of these items were associated with failure to record all required information on forms as required by either WAC or City procedures. [Note: these items were addressed at a staff briefing on 12/9/08.]

7 b. i.; ii – The leak investigation report does detail the type of equipment and SN utilized to measure gas levels but the rechecks showing zero reading did not note SN. [Note: these items were addressed at a staff briefing on 12/9/08.]

9 i. – Lack of adequate meter guard. [Note: New barricades have been installed at this location.]

SECTION 3. SUMMARY OF ALLEGED VIOLATIONS

<u>Item No.</u>	<u>Item</u>	<u>Corrective Action (If any)</u>	<u>Ellensburg Enhancements</u>
1.	<b>WAC 480-90-328 Meter Identification</b> Ellensburg has not properly labeled all of their meters. The utility's name or initials is missing.	Meter Badges have been purchased and have been retrofitted. Monitoring and inspection shall be undertaken during the annual leak and corrosion surveys.	Procedure changed to require meter badges to be attached to all meters found to be missing a badge.
2a.	<b>WAC 480-93-015(2) &amp; (5) Odorization of Gas</b> Instruments utilized by Ellensburg to complete sniff tests are not properly documented on records.	None - Disputed	Forms have been amended to record the instrument and serial number for future.
2b.	Records did not indicate the type of equipment used and the equipment serial number.	None - Disputed	Forms have been amended to record the instrument and serial number for future.
3.	<b>WAC 480-93-140(1) Service Regulators</b> The regulator installation was not in accordance with manufacturer's recommendations	None - Disputed	Vents have been adjusted vertically down.
4a.	<b>WAC 480-93-170(4), (6), &amp; (7)(f) Tests and Reports for Gas Pipelines</b> Leak repair reports do not indicate that they have been properly pressure tested	None - Disputed	None
4b.	Leak repair report did not indicate that tie-ins were soap tested.	Full staff briefings took place on 12/9/08 to correct this and other paperwork issues.	
4b.	Leak repair reports do not indicate the length of pipe replaced	None - Disputed	None
5a.	<b>WAC 480-93-180(1) and (3) Plan and Procedures</b> Ellensburg did not follow their own procedures under O&M Section 12.3 which is a general statement identifying that coating is required and that no installation of unprotected pipe should occur in their system.	None - Disputed	Marginally accessible valves improved or replaced. Continuing monitoring during leak and corrosion surveys
5b.	Atmospheric corrosion monitoring was not properly completed in accordance with Ellensburg	None - Disputed	None

	Procedures.		
5c.	Ellensburg did not properly complete the following leak repair reports and did not indicate that they had properly pressure tested the following in accordance with their own procedures:	None - Disputed	None
5d.	Ellensburg did not properly complete the following leak repair reports and did not indicate that tie-ins were soap tested in accordance with their own procedures.	Full staff briefings took place on 12/9/08 to correct this and other paperwork issues.	None
5e	Ellensburg did not properly complete the following leak repair reports did not indicate the length of pipe replaced in accordance with their own procedures:	None - Disputed	None
5f	Ellensburg did not complete documentation in accordance with their own procedures of a completed gas leak survey to service tie-in after 3rd party damage.	None - Disputed	Staff instructed to fill out separate LRR during rechecks
5g.	Ellensburg did not have a written procedure identifying AOC's (issues and elements) to be considered by meter readers when reviewing completing their Atmospheric Corrosion inspection nor did they have a procedure identifying the associated remediation process.	None - Disputed	Awareness information provided to Meter Readers
6.	<b>WAC 480-93-186(2) Leak Evaluation</b> Leak investigation/repair reports do not identify the leak perimeter	None - Disputed	Staff instructed to record escapes confined to excavations on LIR
7a.	<b>WAC 480-93-187(12) and (13) Gas Leak Records</b> Leak repair reports do not identify the magnitude and location of CGI readings remaining at leak site	None - Disputed	Staff instructed to record escapes confined to excavations on LIR
7b.	Leak repair reports do not identify the type of equipment & SN utilized to measure gas levels	None - Disputed	None



8a.	<b>WAC 480-93-188(4)(e), (5)(c) and (f) Gas Leak Surveys</b> Documentation of a completed gas leak survey for the following services was unavailable	Full staff briefings took place on 12/9/08 to correct this and other paperwork issues.	
8a.	<b>WAC 480-93-188(4)(e), (5)(c) and (f) Gas Leak Surveys</b> Documentation of a completed gas leak survey for the following services was unavailable	None - Disputed	Staff instructed to fill out separate LRR during rechecks
8b.	On special leak surveys the method of survey and instrument SN has not been included on forms.	None - Disputed	None
9.	<b>CFR 49 §192.353 (a) Customer Meters and Regulators: Location.</b> The following have not been properly protected from damage.	Meter barricades have been replaced	
9.	<b>CFR 49 §192.353 (a) Customer Meters and Regulators: Location.</b> The following have not been properly protected from damage.	None - Disputed	Improved barriers installed – Customer informed
10.	<b>CFR 49 §192.355(b)(2) Customer Meters and Regulators: Protection from Damage</b> The vent terminus is not located in a position allowing venting gas to freely escape into the atmosphere.	None - Disputed	None
11.	<b>CFR 49 §192.365(b) Service lines: Location of Valves</b> Service shut-off valves were not readily accessible.	None - Disputed	None
12.	<b>CFR 49 §192.455(a)(1) External Corrosion Control</b> The following were not properly coated:	None - Disputed	None
13.	<b>CFR 49 §192.479 Atmospheric Corrosion Control: General</b> The following were not properly considered or completed as atmospheric corrosion control issues:	None - Disputed	None
14.	<b>CFR 49 §192.481 Atmospheric</b>	None - Disputed	None

	<b>Corrosion Control Monitoring</b> Atmospheric corrosion monitoring was not properly completed.		
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**Attachments:**

Odorometer Calibration Records

Regulator Information

Photographs of 1800 Canyon Rd., Bar 14 Restaurant.

Rear of 600 N. Main Street

Photograph of rear of Daily Record

Photograph of Kittitas County Courthouse

Photograph of Kittitas Tap Station

Photograph of Albertsons



# Instruments

**ID:** **1**

**Equipment Type:** **Odorometer**

**Instrument Description:** **Bacharach Odorometer**

**Serial Number:** **VE 0509**

**Location:** **Meter Room**

**Calibration Interval:** **Once per Year not exceeding 15 Months**

**Ellensburg No** **461-0104**

**Notes:**

Date Last Calibrated	Calibrated By	Next Calibration Due	
2/11/2008	Outside Agency	5/10/2009	
12/1/2007	Rod Paul	12/31/2008	



# Instruments

**ID:** 6

**Equipment Type:** Odorometer

**Instrument Description:** Heath Odorator

**Serial Number:** 2000618019

**Location:** Meter Room

**Calibration Interval:** Once per Year not exceeding 15 Months

**Ellensburg No**

**Notes:**

Date Last Calibrated	Calibrated By	Date	Calibration Status
8/26/2008	Outside Agency	11/26/2009	
12/9/2006	Outside Agency	3/31/2008	
7/28/2006	Outside Agency	10/26/2007	

**Ordering Information**

Specify:

1. Inlet and Outlet Connection Size and Type
2. Model Number
3. Outlet pressure desired
4. Inlet pressure range
5. Type of gas and maximum capacity required
6. Assembly position number (SEE POSITION CHART BELOW)
7. Vent size
8. Special requirements such as tagging, 1/8" pipe plug tap, seal wire, etc.

**Warranty**

Actaris Metering Systems, 970 Highway 127 North, Owenton, Kentucky 40359-9802, warrants this gas product against defects in materials and workmanship for the earlier of one (1) year from the date the product is shipped by Actaris or a period of one year from the date the product is installed at the original purchaser's site. During such one-year period, provided that the original purchaser continues to own the product, Actaris will, at its sole option, repair any defects, replace the product or repay the purchase price.

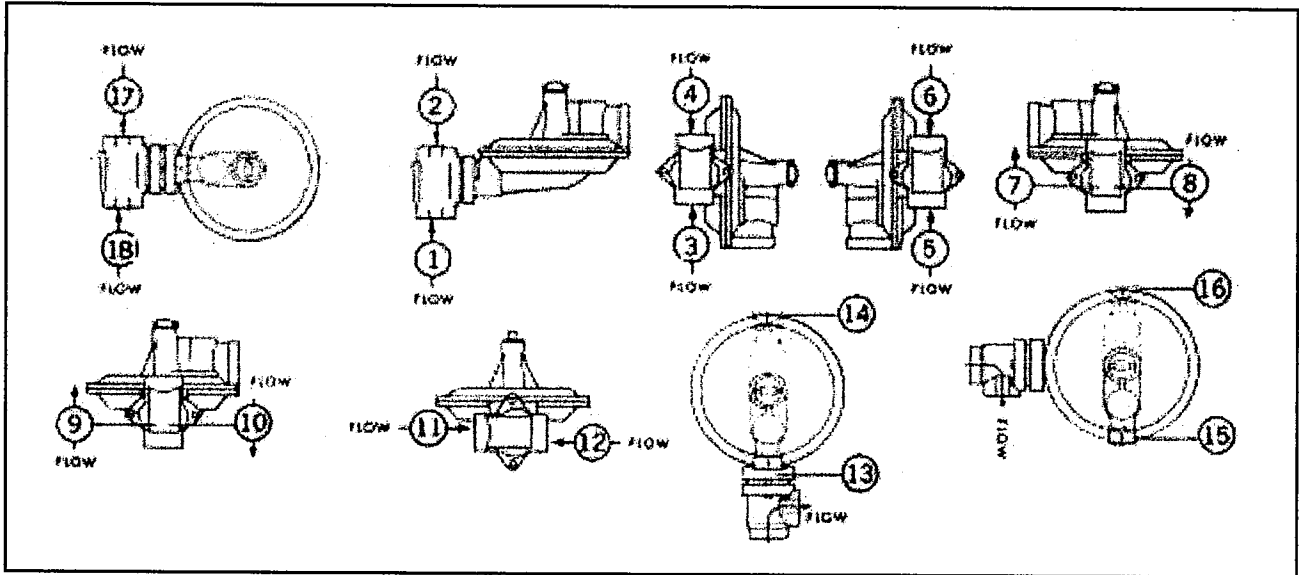
This warranty will be void if the purchaser fails to observe the procedures for installation, operation or service of the product as set forth in the Operating Manual and Specifications for the product or if the defect is caused by tampering,

physical abuse or misuse of the product. Actaris specifically disclaims all implied warranties including those of merchantability or of fitness for a particular purpose. Under no circumstances will Actaris be liable for incidental or consequential damages of any kind whatsoever.

The liability for any claim of any kind, including negligence and breach of warranty for the sale and use of any product covered by or furnished, shall in no case exceed the price allocable to the product or part thereof which gives rise to the claim.

In the event of a malfunction of the product, consult your Actaris Service Representative or Actaris Metering Systems, 970 Highway 127 North, Owenton, Kentucky 40359-9802.

**Assembly Positions**



ACTARIS B31

## Ordering Information

Specify:

1. Inlet and outlet connection size and body type
2. Model number
3. Outlet pressure desired
4. Inlet pressure range
5. Type of gas and maximum capacity in scfh required
6. Assembly position number
7. Vent Size
8. Special requirements such as tagging, 1/8" pipe, tap, wire seal, etc.

## Warranty

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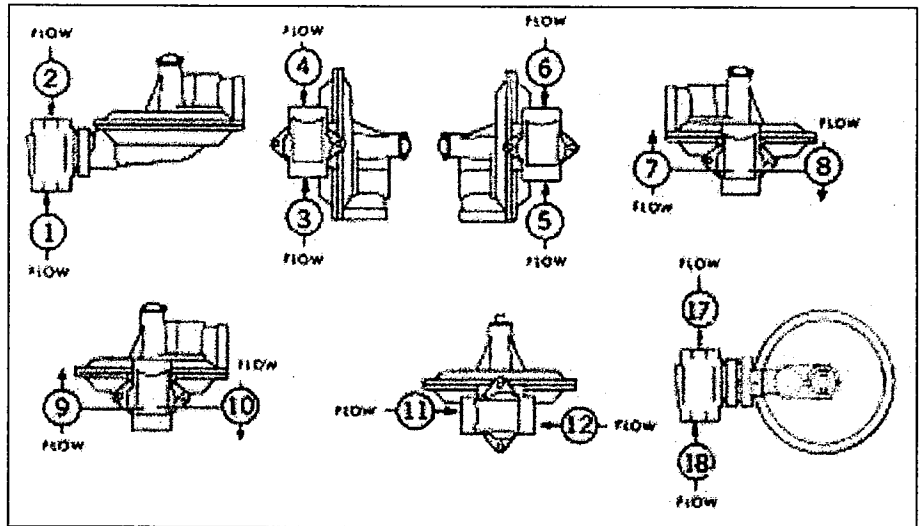
In the event of a malfunction of the product, consult your Actaris Service Representative or Actaris Metering Systems, 970 Highway 127 North, Owenton, Kentucky 40359-9802.

## Actaris Metering Systems

970 Highway 127 North  
Owenton, Kentucky 40359-9302  
Telephone: (502) 484-5747  
Fax: (502) 484-6223  
Customer Service: (800) 490-0657  
[www.ActarisUSgas.com](http://www.ActarisUSgas.com)

## Assembly Positions - All Models

Shown are 12 basic positions for assembling the B-34 models. Specify the assembly position desired by number when ordering.



## Reference Information

- Installation and Maintenance Instructions K5P
- Parts List K5S

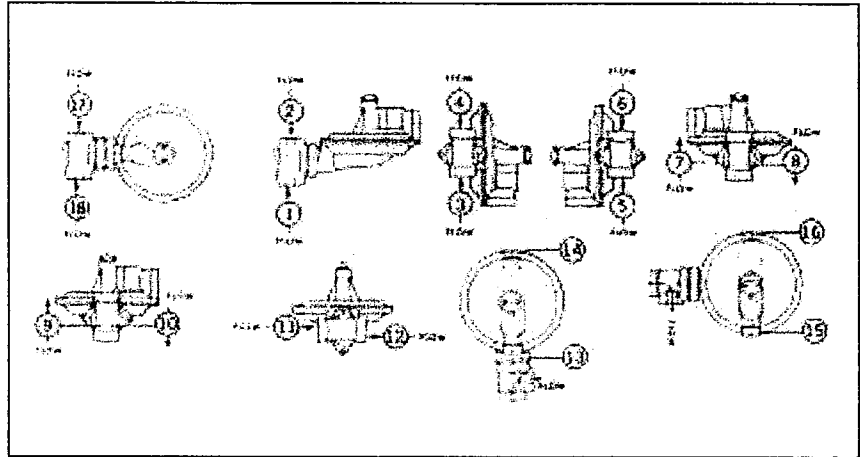


## Ordering Information

Specify:

1. Inlet and Outlet Connection  
Size and Type
2. Model Number
3. Outlet pressure desired
4. Inlet pressure range
5. Type of gas and maximum capacity required
6. Assembly position number  
(see chart at right)
7. Vent size
8. Special requirements such as tagging, 1/8" pipe plug tap, seal wire, etc.

## Assembly Positions



## Warranty

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damages of any kind whatsoever.

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In the event of a malfunction of the product, consult your Actaris Service Representative or Actaris Metering Systems, 970 Highway 127 North, Owenton, Kentucky 40359-9802.

## Reference Information

- Regulator Pressure Ratings - JOT-2
- Regulator Startup - #769402

**Actaris Metering Systems**  
970 Highway 127 North  
Owenton, Kentucky 40359-9302, USA  
Tel.: +1 800 490 0657  
+1 502 484 5747  
Fax: +1 502 484 6223

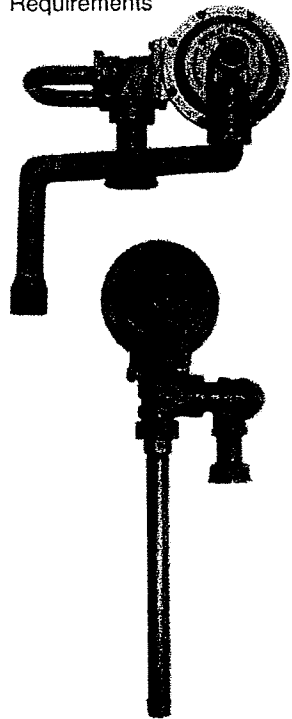
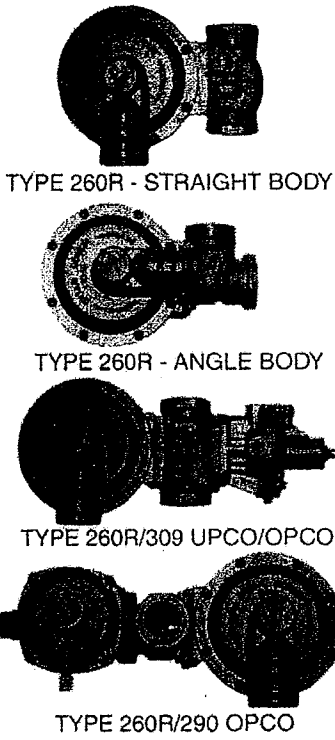
[www.ActarisUSgas.com](http://www.ActarisUSgas.com)

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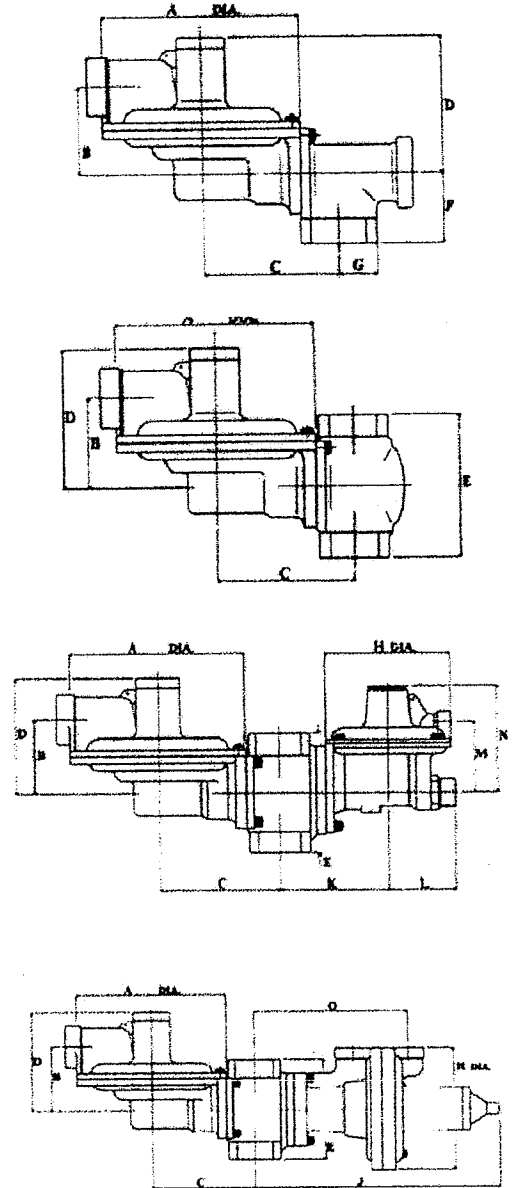


**BODY TYPE**

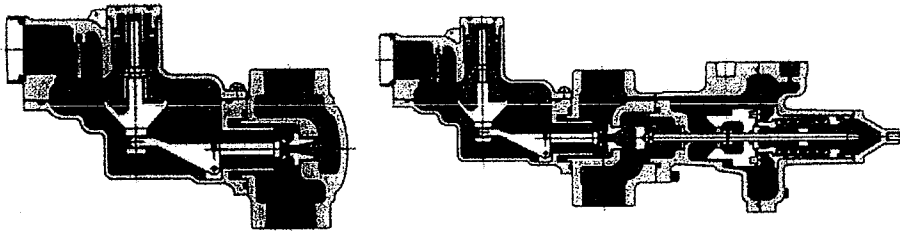
Specially Designed Meter Set Assemblies To Customer Requirements



**DIMENSIONAL DRAWINGS**



**SECTIONAL DIAGRAMS**



Standard

W / Safety Device

A	B	C	D	E	F	G	H	J	K	L	M	N	O
5 1/2"	2 1/2"	3 3/4"	4 1/2"	4"	2"	1 3/4"	3 3/4"	5 3/4"	4 1/4"	2 1/2"	2 1/2"	3 3/4"	3 3/4"

**Bryan Donkin RMG**  
Canada Limited



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Serving the Gas Industry WORLDWIDE



**Contact Information**

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Phone: 1 519-539-8531  
Fax: 1 519-537-3339  
Email: sales@bdrmgcanada.com

[www.rmg.de](http://www.rmg.de)

Solutions in:

- Gas pressure regulators and safety devices
- Metering
- Design/Assembly of Gas Control Modules, Complete Regulating & Metering Station
- Filters, Pre-Heaters, Flame Arrestors
- Electronic Flow Corrector Systems, Odorizers, Data Logging, Recording & Control Systems, Station Management



# Bulletin 71.1:HSR

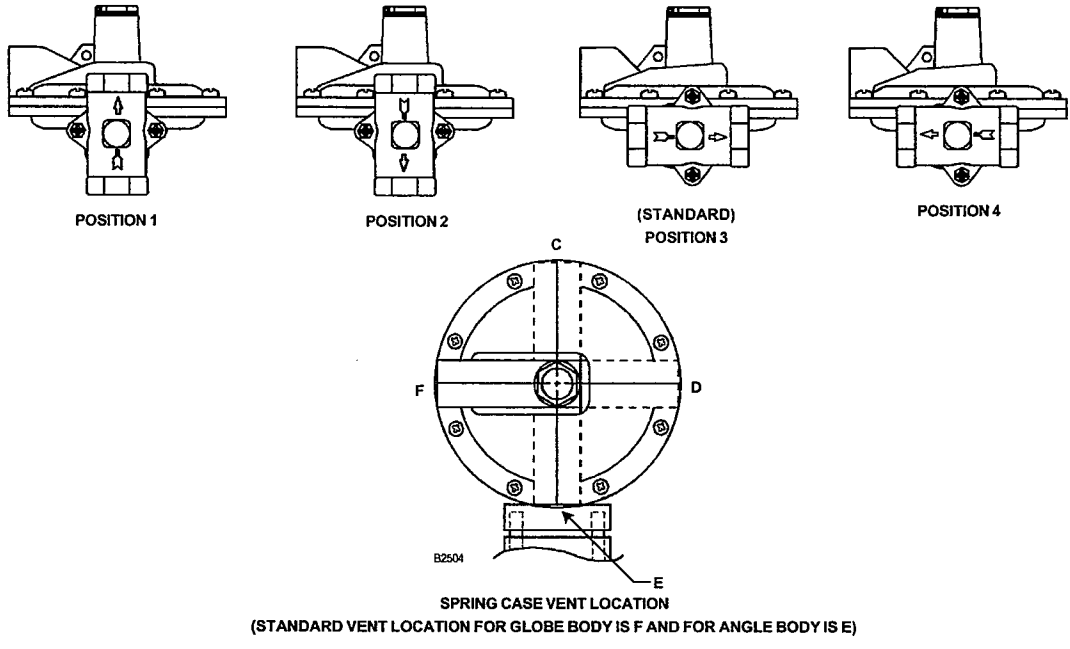


Figure 5. Regulator Body and Spring Case Vent Locations (Body position is with regard to the outlet)

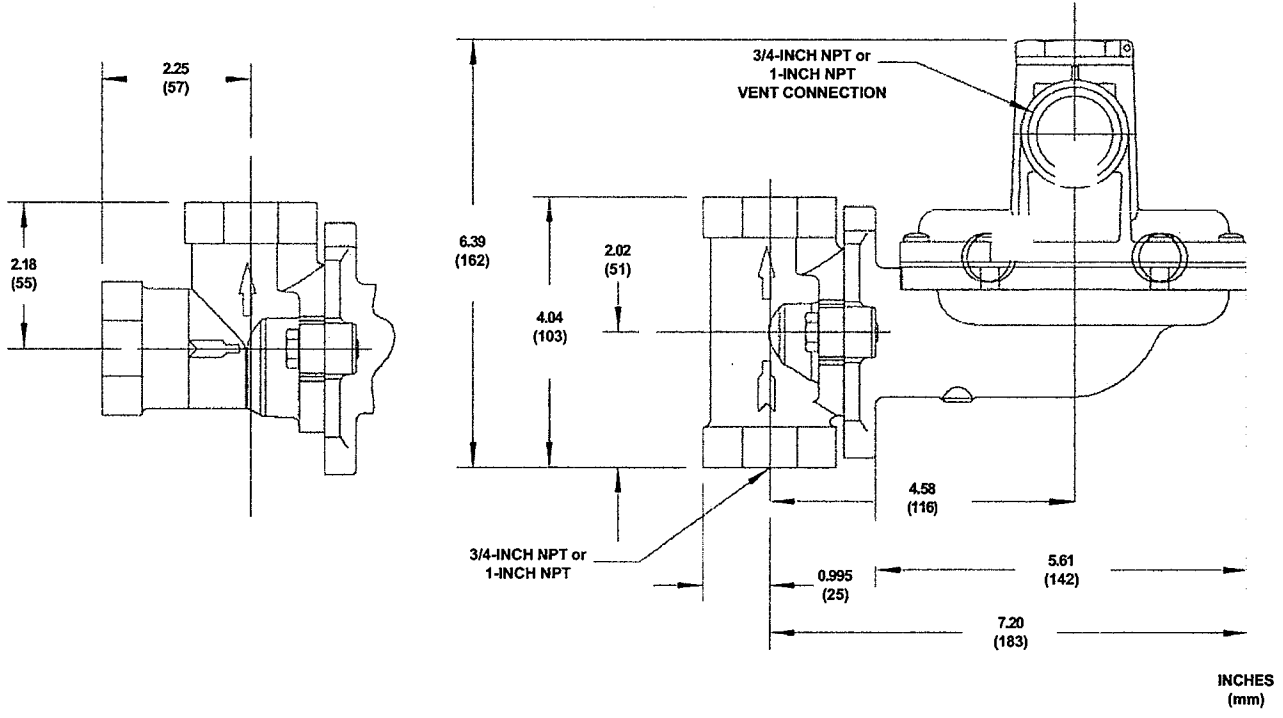
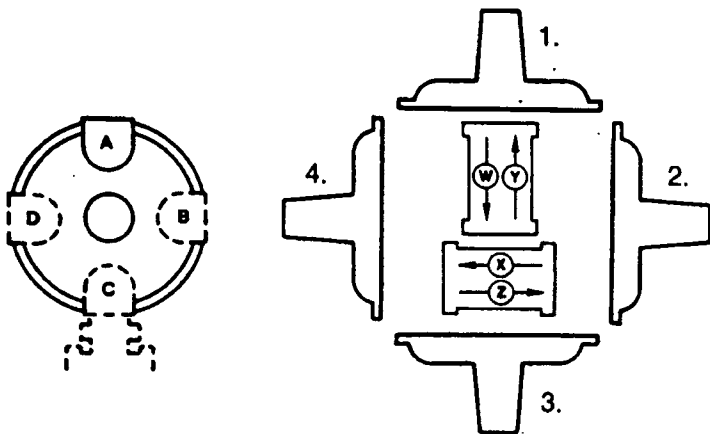


Figure 6. Dimensions

FISHER

<p>101</p>	<p>102</p>	<p>103</p>	<p>104</p>
<p>105</p>	<p>106</p>	<p>107</p>	<p>108</p>
<p>109</p>	<p>110</p>	<p>111</p>	<p>112</p>

**NOTE:** If desired position is not shown, use these diagrams to specify vent, diaphragm case, and body arrangements. Example: Position 105 would be D-4-Y.



### CAUTION

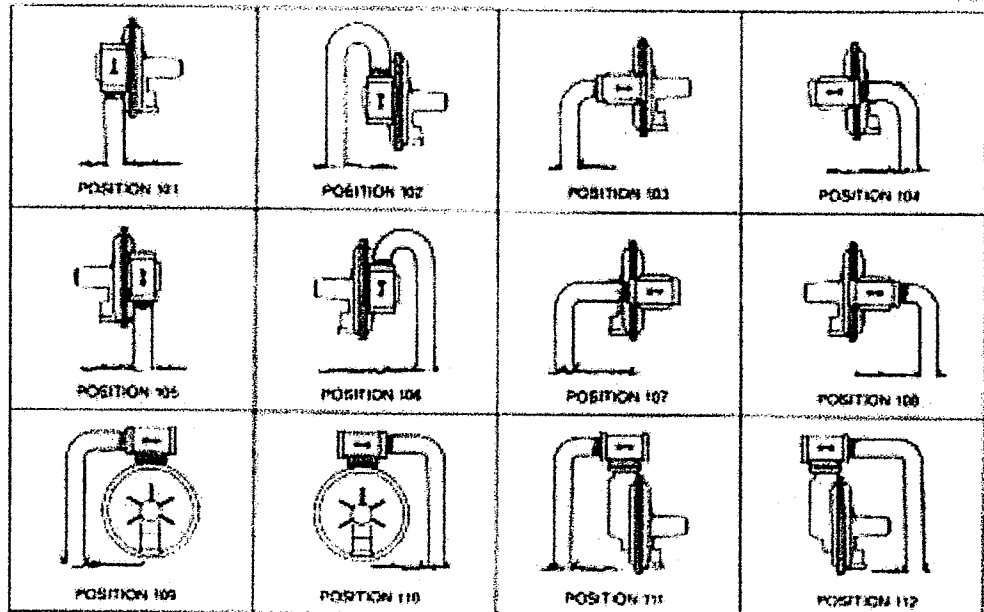
The diaphragm case vent must be positioned to protect against flooding, drain water, ice formation, traffic, tampering, etc. The vent must be protected against nest building, animals, bees, insects, etc. to prevent vent blockage and minimize the chances of foreign material from collecting in the vent side of the regulator diaphragm.

## Mounting Positions

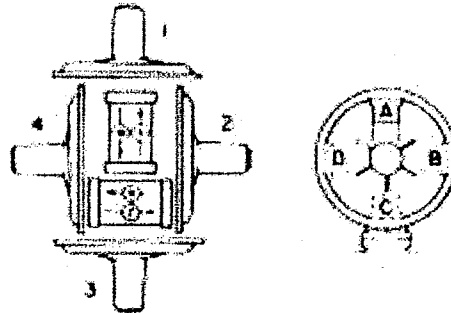
The 243 Service Regulator can be provided in any of the positions shown. Specify by position number when ordering.

### CAUTION

The diaphragm case vent must be positioned to protect against flooding, drain water, ice formation, traffic, tampering, etc. The vent must be protected against nest building, animals, bees, insects, etc. to prevent vent blockage and minimize the chances of foreign material from collecting in the vent side.



NOTE: If desired position is not shown use diagrams at right as guides to specify vent, diaphragm case, and body arrangement. Example: Position 105 would be D-4-Y.

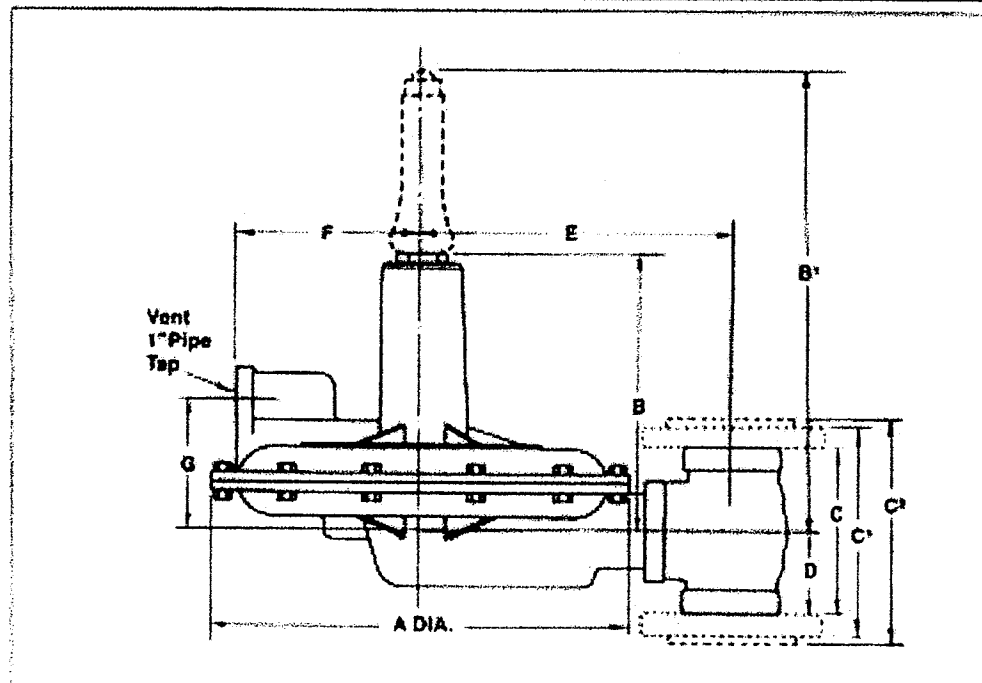


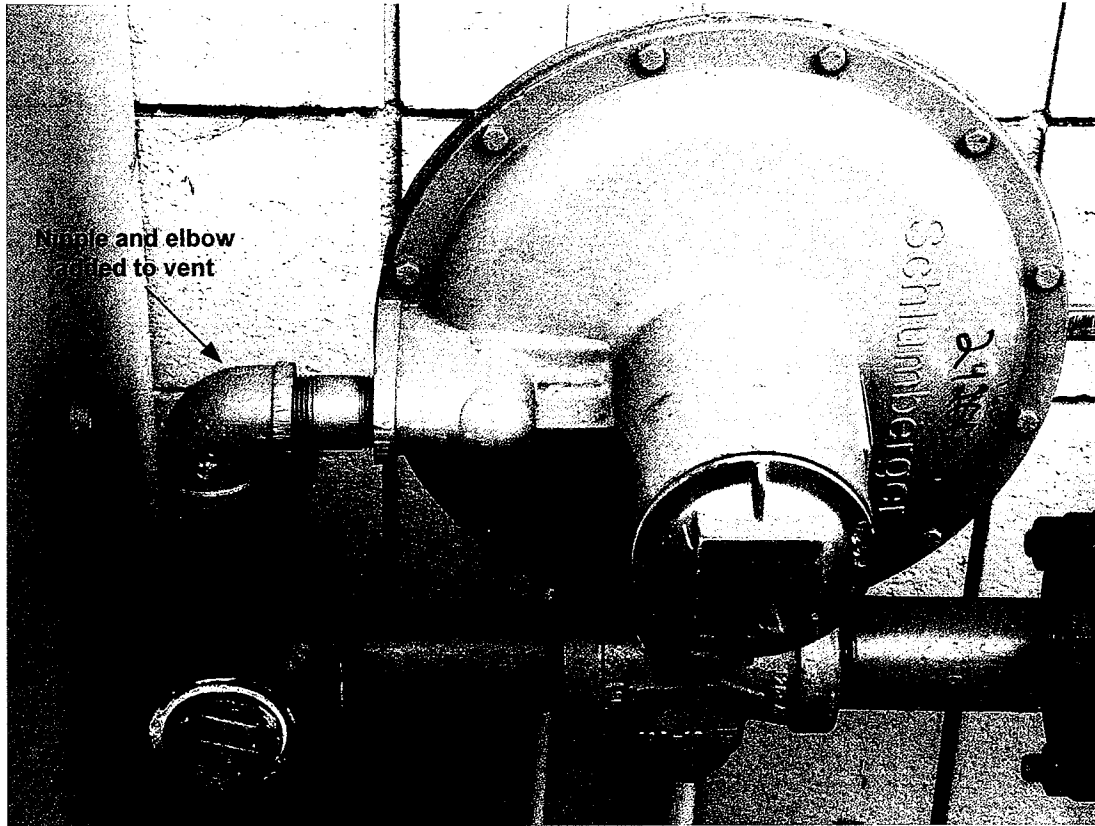
**CAUTION:** It is the user's responsibility to assure that all service regulator vents and/or vent lines exhaust to a non-hazardous location away from any potential sources of ignition. Refer to Bulletin RM-1306 for more detailed information.

## Dimensions

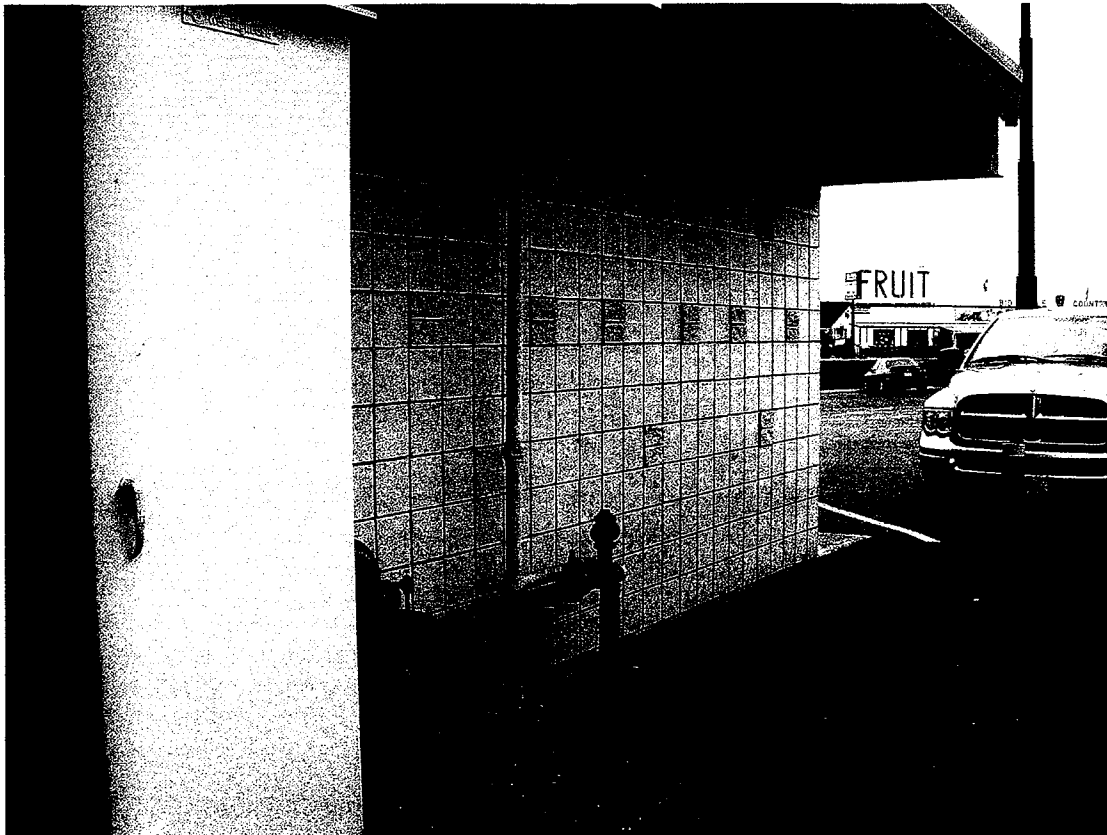
Model	243-12	243-B	243-BHP
A	14"	10 1/2"	10 1/2"
**B	8 1/2"	8 1/2"	-
B'	-	-	12 1/2"
C	5 1/2"	5 1/2"	5 1/2"
***C'	7 1/2"	7 1/2"	7 1/2"
****C''	7 1/2"	7 1/2"	7 1/2"
D	2 1/2"	2 1/2"	2 1/2"
E	10 1/2"	8 1/2"	8 1/2"
F	6 1/2"	4 1/2"	4 1/2"
G	4 1/2"	4 1/2"	4 1/2"
Shipping Weight	27 lbs	25 lbs	29 lbs

A: 1/2" NPT  
 B: 1/2" NPT  
 C: 1/2" NPT  
 D: 1/2" NPT  
 E: 1/2" NPT  
 F: 1/2" NPT  
 G: 1/2" NPT





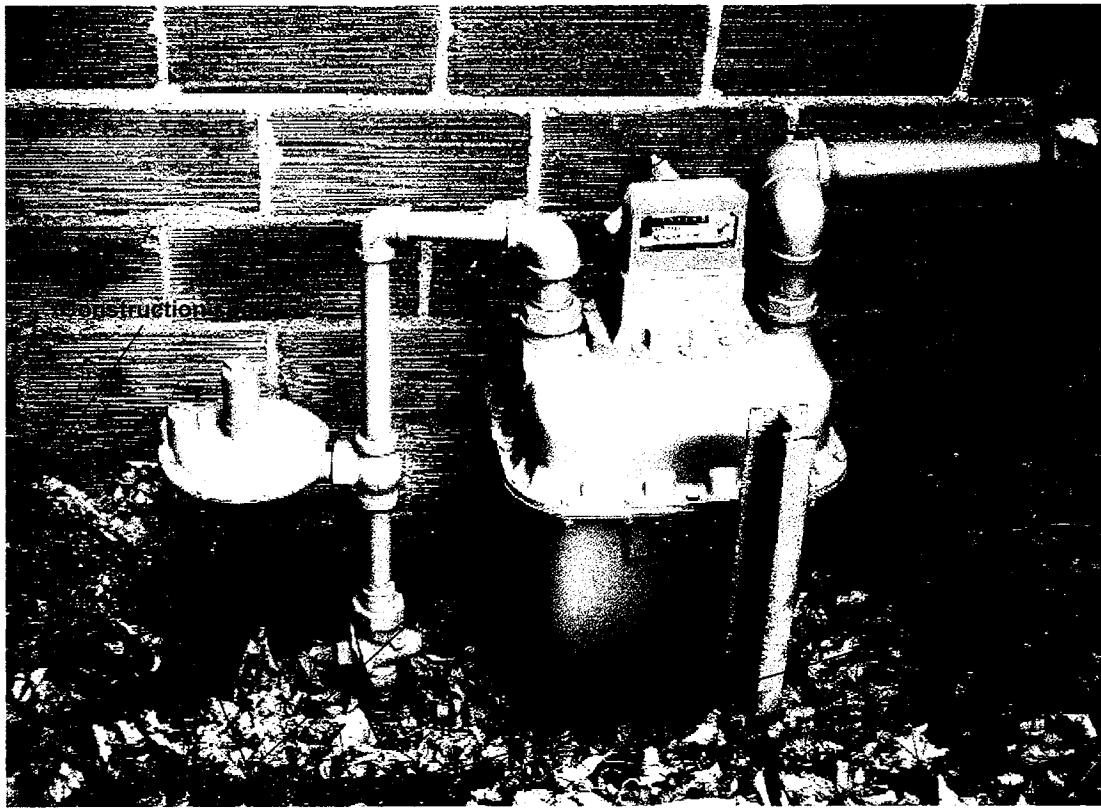
**Bar 14 - Showing modified vent (above)**



**Bar 14 - Showing meter location and (vent) protection from weather (above)**



Rear of 600 N. Main Street showing building addition (Above)



Rear of 600 N. Main Street showing existing gas meter (Above)



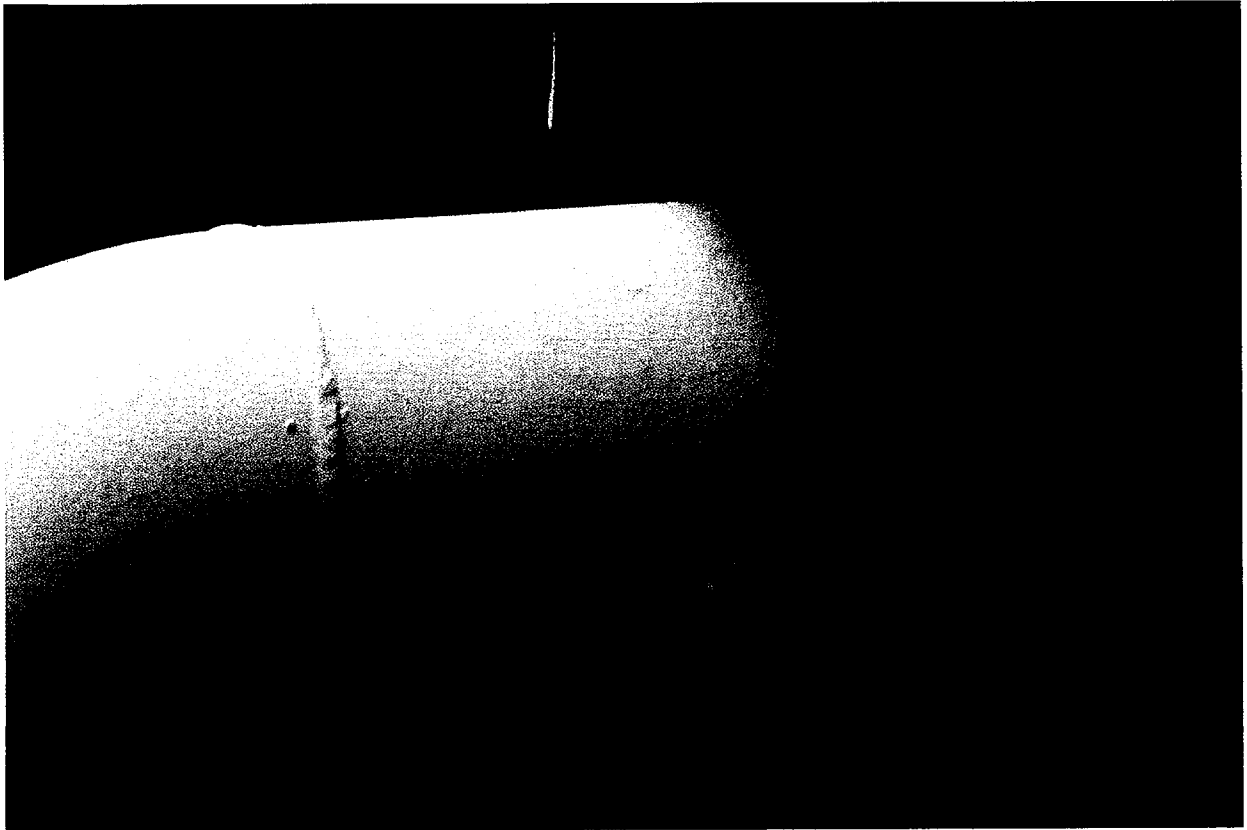
**Rear of 600 N. Main Street showing approx. ground level before building work**



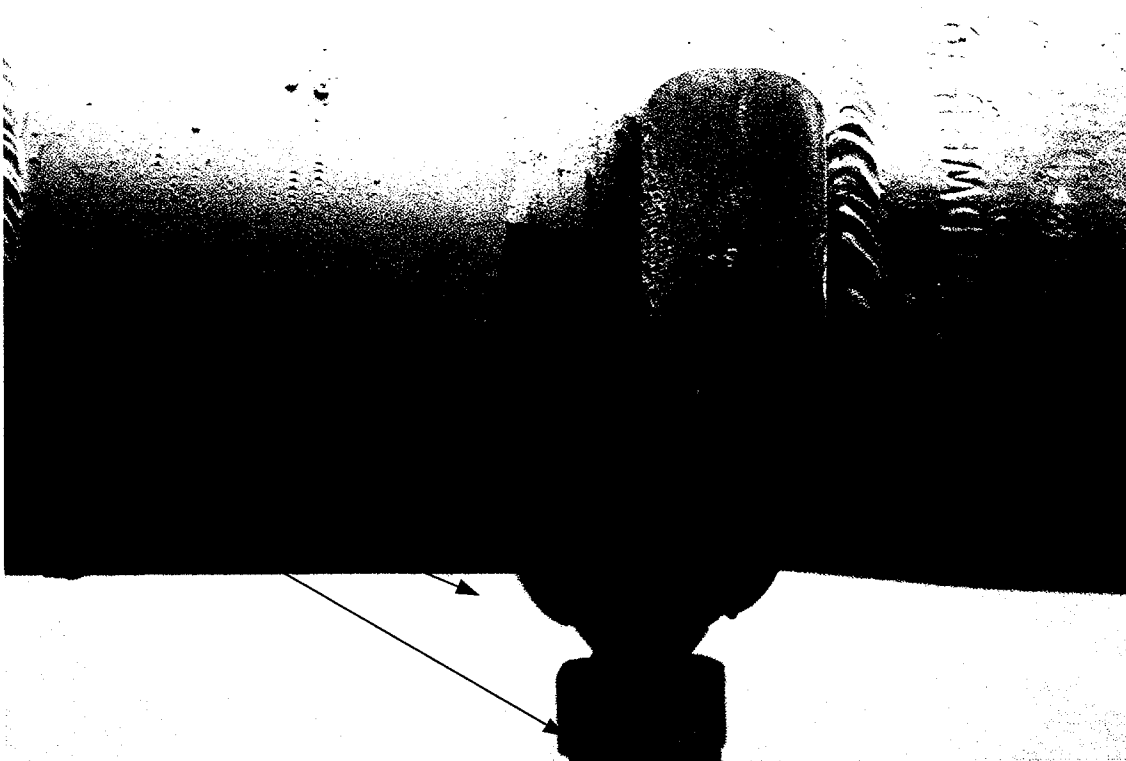


205 W. 5th (Kittitas County Courthouse) showing meter set - (WUTC Photo above)

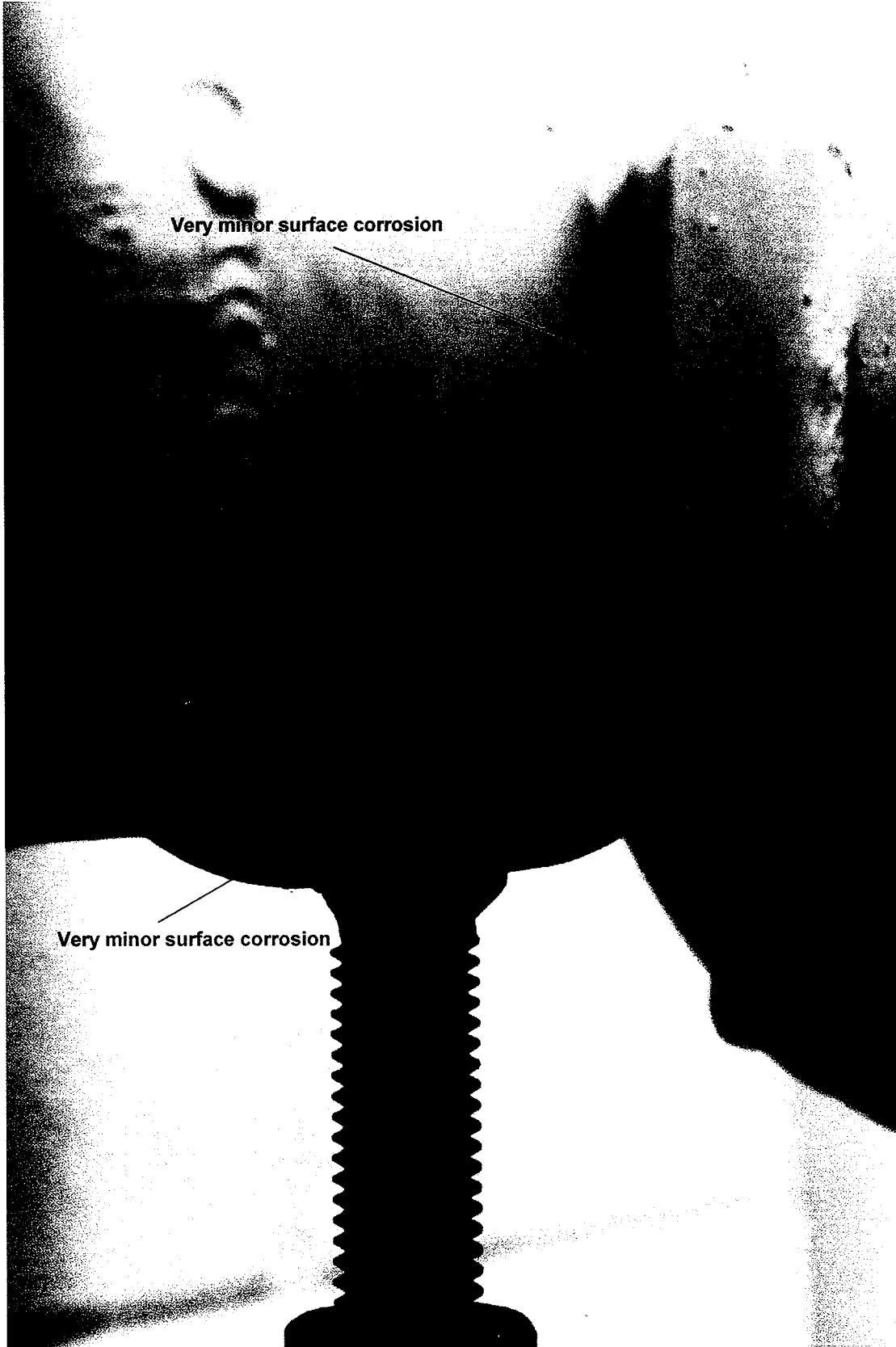




Kittitas Tap Station - East Wall (WUTC Photo - above)



Albertson's - 705 N. Ruby Street - Showing pipe support (WUTC Photo - above)



Albertson's - 705 N. Ruby Street - Showing pipe support (WUTC Photo - above)