A completed Standard Inspection Checklist, OQ Field Validation Protocol form and Cover Letter/Field Report are to be submitted to the Senior Engineer within 30 days from completion of the inspection.

·	Inspection Rep	ort		
Docket Number	PG-080097			
Inspector Name & Submit Date	P. Johnson 11-12-2008			,
Sr. Eng Name & Review/Date	D. Lykken 11/13/2008			
	Operator Inform	ation		·
Name of Operator:	The City of Enumclaw	* **	OP ID#:	4500
Name of Unit(s):		•	•	•
Records Location:				
Date(s) of Last (unit) Inspection:	051609 Specialized, 040525 Standard	Inspection Date(s):	6-9-08 thru	6-13-2008

Inspection Summary:

ok1. Master Meter at Fairgrounds, Warner or 456th and 284th Ave SE – Enumclaw replaced with individual services. This is a HOS and Enumclaw made business district.

* Enumclaw does not have their name on meters WAC 480-90-328. Enumclaw was unaware of this rule. Mark said that PSE has changed some of Enumclaw's meters.

AOC #3 - WAC 480-90-328

Gas utilities must identify each meter by a unique series of serial numbers, letters, or combination of both, placed in a conspicuous position on the meter, along with the utility's name or initials. Utilities must update the name or initials on its meters within three years of a name change.

Finding

The City of Enumelaw does not have Enumelaw's name on their natural gas meters.

* Heads UP

192.353 barricades, on police building is a bollard but garbage cans are pushed behind it and up against meter. Mtr 2685310. Informed Enumelaw

*Going to uprate to 60 psig system so the fracture disc works (currently fractures at 57 and that is over). Plan is to raise MAOP to 60 and leave operating pressure the same so it will relieve in the proper pressure. At 40 lbs should break at 46 by code and current fracture discs are designed to break at 50 to 57 which is over. Enumclaw will evidentially have 40, 60 and 250 lb line. 480-93-155 says up rate to 60psig. NOTE: Waiver establishing the MAOP states for distribution anything installed prior to 1978 cannot go over 40 psig.

PV 2 CFR 192.201(a)(2)(ii) required capacity of pressure relieving and limiting stations

a) Each pressure relief station or pressure limiting station or group of those stations installed to protect a pipeline must have enough capacity, and must be set to operate, to insure the following:... (2) In pipelines other than a low pressure distribution system:... (ii) If the maximum allowable operating pressure is 12 p.s.i. (83 kPa) gage or more, but less than 60 p.s.i. (414 kPa) gage, the pressure may not exceed the maximum allowable operating pressure plus 6 p.s.i. (41 kPa) gage; ...

Enumclaw has previously been notified in Dockets 930308, 940908, 951343 and 000955 of probable violations regarding Systems Pressures.

Finding:

Enumclaw's farm taps on the 250 MAOP pipeline operate at 40 psig and do not meet CFR 192.201(a)(2)(i) requirement of pressure (40 psig) plus six psi. Enumclaw's farm tap rupture discs relieve between 54 and 57 psig. Enumclaw's farm taps relief between 8 and 11 psig higher than allowed. Following is a list of farm taps that do not meet the requirement:

- L. 45527 244th Ave SE
- 2. 45423 244 24^{4th} Ave SE

T		cords Review and Field Inspection
Inspe	ction Summary: 3. 45317 244 th Ave SE	
	4. 45203 244 th Ave SE	
	5. 44807 244 th Ave SE	
	 22233 SE 436th St. 22109 SE 436th St. 	
	7. 22109 SE 436" St. 8. 22025 SE 436 th St.	
İ	 21928 SE 436th St. 21611 SE 436th St. 	
	11. 21416 SE 436 th St.	
	11. 21416 SE 436" St. 12. 21207 SE 436 th St.	
	12. 21207 SE 436" St. 13. 20911 SE 436 th St.	
	15. 20911 SE 430 St. 14. 43706 208 th Ave SE	
l	15. 20613 SE 436 th St	
	16. 20104 SE 436 th St	
	17. 20101 SE 436 th St	
	18. 19120 SE 432 nd St	
	19. 42906 Auburn-Enumclaw Hwy	
	20. 188 th /Auburn-Enumclaw Hwy	
	21. 42705 Auburn/Enumelaw Hwy	
ł	22. 42316 Auburn/Enumclaw Hwy	
	23. 42315 Auburn/Enumelaw Hwy	
	24. 41801 180 th AVE SE	
	25. 41527 Auburn/Enumclaw Hwy	
	26. 40901 Auburn/Enumelaw Hwy	
27.	39819 Auburn/Enumclaw Hwy	
28.	39719 Auburn/Enumelaw Hwy	
29.	39606 Auburn/Enumelaw Hwy	
30.	39525 Auburn/Enumclaw Hwy	
31.	39409 Auburn/Enumclaw Hwy	
32.	39406 Auburn/Enumclaw Hwy	
33.	39307 Auburn/Enumclaw Hwy	
34.	38924 Auburn/Enumclaw Hwy	
35.	38819 Auburn/Enumclaw Hwy	
36.	38629 Auburn/Enumclaw Hwy	
37.	38606 Auburn/Enumclaw Hwy	
38.	38501 Auburn/Enumelaw Hwy	
39.	38334 Auburn/Enumclaw Hwy	
40.	38325 Auburn/Enumclaw Hwy	
41.	38117 Auburn/Enumclaw Hwy	
42.	37978 Auburn/Enumclaw Hwy	
43.	37927 Auburn/Enumclaw Hwy	
44.	37739 Auburn/Enumclaw Hwy	
45.	37676 Auburn/Enumclaw Hwy	
46.	151st/ Auburn/Enumclaw Hwy	
47.	37637 Auburn/Enumclaw Hwy	
48.	37326 Auburn/Enumclaw Hwy	
49.	37127 Auburn/Enumelaw Hwy	
50.	37105 Auburn/Enumclaw Hwy	
51.	36823 Auburn/Enumclaw Hwy	
52.	36809 Auburn/Enumclaw Hwy	
	53. 5825 Auburn Way S	
	54. 5709 Auburn Way S	

Inspection Summary:

56.

5636 Auburn Way S

5605 Auburn Way S

	taps not in use still in field. When ground gas carrying pipes. Enumo		hanged to 40 psig the farm taps were not	removed a	and have become		
HO A	Address:		System/Unit Name & Address:				
2041	Railroad St nclaw, WA 98022	The City of Enumclaw 2041 Railroad St Enumclaw, WA 98022					
Phon Fax N	Official: Mark Bauer e No.: (360) 825-556 No.: rgency Phone No.:	41	Phone No.: Fax No.: Emergency Phone No.:				
	Persons Interviewed		Title		No.		
	Jim Flisrand		Operations Manager		5-5541		
	Mark Vanwieringen		or of Operations	(360) 825-5541			
	Paul Oleksa	Okeksa C	onsultant Inc				
WU		dist focuses on Records	ction on 192 O&M and WAC items and Field items per a routine stand denter appropriate date)				
\boxtimes	Team inspection was performed (Within the past five years.)	or,	Date:	Spring 2008		
	Other WUTC Inspector reviewed the operator.)	Date:					

		GAS SYS	TEM OPERATIONS	
Gas Supplier	r Williams			· · · · · · · · · · · · · · · · · · ·
Services: Residential 36	504 Commercial 402 Industrial	Other	Total 4000 customers	
Number of re	eportable safety related conditions last ye	ear 0	Number of deferred leaks in sys	tem 0
Number of no	on-reportable safety related conditions la	ast year 0	Number of third party hits last y	ear 6 in 2007
Miles of trans class 3 & 4 ar	smission pipeline within unit (total miles reas) 0	s and miles in	Miles of main within inspection areas) 87.8	unit(total miles and miles in class 3 & 4
	Operating Pressure(s):		MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder: 2	250 psig		250 psig	250psig
Town: N	Main Gate		250psig	40psig
Other:				
Does the oper	rator have any transmission pipelines?	no		
Compressor s	stations? Use Attachment 1.	no		

Pipe Specifications:			
Year Installed (Range)	1957 to present	Pipe Diameters (Range)	½ to 6"
Material Type	pe and steel wrapped	Line Pipe Specification Used	varies
Mileage	Steel coated 49.3 miles, pe -	SMYS %	Under 20%
	38.53 miles	·	

Operator Qualification Field Validation

Important: Per OPS, the OQ Field Inspection Protocol Form (Rev 3, Feb 08) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA OQ Database (OQDB) located at http://primis.phmsa.dot.gov/oqdb/home.oq Date Completed 6-13-2008

ONL	Y REPORTED IN	REPORTING RECORDS CIDENT IS #1601 OVER 25 OUT	S	U	N/A;	N/C
1.	191.5	Any incidents requiring telephonic reporting to the NRC (800-424-8802) None in 2007	x			
2.	191.25	Filing the Safety Related Condition Report within 5 days of determination, but not later than 10 days after discovery none	x			
3.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports				
4.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 2 hours) for events which results in;				
5.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization; none	х			
6.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; none	x			
7.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas; none	х			
8.	480-93-200(1)(d)	The unintentional ignition of gas none	х			

		REPORTING RECORDS	S	- U	N/A	N/C
ONL	Y REPORTED IN	CIDENT IS #1601 OVER 25 OUT	.3	·U	1977	W.C.
9.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; Oct 4 2006 reported none in 2007	х			
10.	480-93-200(1)(f)	A pipeline or system pressure exceeding the MAOP plus ten percent or the maximum				
11.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (f) of this subsection; none	x			□ FORM
12	480-93-200(2)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 24 hours) for; none				
13.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours; none	x			
14.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply gas pipeline out of service; In 2005 part of the 250 psig was separated and pressure lowered to 40psig	x		٠	
15.	480-93-200(2)(c)	A gas pipeline or system operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or none	х			
16.	480-93-200(2)(d)	A gas pipeline or system pressure exceeding the MAOP none	х			
17.	480-93-200(4)	Did written incident reports (within 30 days of telephonic notice) include the following none				
18	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged; none	x			
19.	480-93-200(4)(b)	The extent of injuries and damage;	х			
20.	480-93-200(4)(c)	A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report; none	х		. +1	
21.	480-93-200(4)(d)	A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved; none	х			
22.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident; none	х			
23.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site; none	х			
24.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe; none	х			
25.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made; none	х			
26.	480-93-200(4)(i) The cost of the incident to the ((operator)) gas pipeline company; none		x			
27.	480-93-200(4)(j)	Line type none	х			
28.	480-93-200(4)(k)	City and county of incident; and none	х			
29.	480-93-200(4)(1)	Any other information deemed necessary by the commission. none	х			
30.	480-93-200(5)	Submit a supplemental report if required information becomes available none	х			

ONL	Y REPORTED IN	REPORTING RECORDS CIDENT IS #1601 OVER 25 OUT	S	U	N/A	N/C
31.	480-93-200(6)	Written report within 45 days of receiving the failure analysis of any incident or hazardous condition due to construction defects or material failure none	x			
32.	480-93-200(7)	Annual Reports filed with the commission no later than March 15 for the proceeding calendar year				
33.	480-93-200(7)(a)	A copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, PHMSA/Office of Pipeline Safety	х			
34.	480-93-200(7)(b)	Damage Prevention Statistics Report including the following;				
35.	480-93-200(7)(b)(i)	Number of gas-related one-call locate requests completed in the field; 2007 is 463 2006 – 456 2005-490	х			

	REPORTING RECORDS	S	Ü	N/A	N/C
	RTED INCIDENT IS #1601 OVER 25 OUT		28.		
36.	AOC 2. WAC 480-93-250 Damage prevention Each gas pipeline company must comply with chapter 19.122 RCW				
	Finding Enumclaw did not use the correct definition of damage in preparing the Damage Prevention Statistics Report. The correct definition is found in RCW 19.122. Enumclaw participates in a qualified "one-call" system. In order to participate in the program Enumclaw needed to understand RCW 19.122. This did cause a probable violation No. 13				
	Number of third-party damages incurred; and 2007 was 6		•		
	2006 was 7 2005 was 11				
	Enumclaw is not reporting damaged coating, dinged pipe, etc on Damage Prevention report. No definition of damage in the manual				
400.00	PV12. WAC 480-93-200(7)(b)(ii) Reporting requirements for operators of gas				
480-93- 200(7)(t	(ii) facilities. (7) Each gas pipeline company must file with the commission the following annual reports no later than March 15 for the preceding calendar year: (b) A report titled, "Damage Prevention Statistics." The Damage Prevention Statistics report must include in detail the following information: (ii) Number of third-party damages incurred;		х		
	Finding Enumclaw did not report all the actual incident damages that occurred in their 2007 annual Damage Prevention Statistics Reports. Enumclaw reported a total of 6 damages for 2007. There were at least 10 damage incidents. 1. 3-19-2007, 1155 Spruce, repair 1" pipe 2. 5-14-2007, 2016 Initial 105' S of center line of Initial in Alley, wrap pipe				
	 9-14-2007, 494 Bondgard, repair ½ pipe 4-30-2007, 2462 McHugh, wrap pipe 3/21/2007, 420 Rainier, wrap pipe 9-7-2007, 38606 Auburn Enumclaw, pulled dresser 8-30-2007, 1730 McHugh, replace part of ½" service 				
	 4-30-2007, 2462 McHugh, wrap pipe 8-20-2007, 415th and Auburn Enumclaw, damaged main 8-24-2007, 415th and Auburn Enumclaw, damaged main and valve 				

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked If an item is marked U, N/A, or N/C, an explanation must be included in this report.

		REPORTING RECORDS	G	177	NGA	NVC
ONL	Y REPORTED IN	CIDENT IS #1601 OVER 25 OUT	2	U	N/A	N/C
37.	480-93-200(7)(b)(iii)	Cause of damage, where cause of damage is classified as one of the following: (A) Inaccurate locate; • 2005 - 2 (B) Failure to use reasonable care; • 2007 - 6 • 2006 - 4 • 2005 - 3 (C) Excavated prior to a locate being conducted; or • 2005 - 6 (D) Excavator failed to call for a locate. • 2007 2 of 6 were no locates • 2006 - 3	x			
38.	480-93-200(7)(c)	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and • 2007 - 2 construction defects • 2006 - 1 construction • 2005 - 1 construction (ii) Types and numbers of material failures. Note 2006 one valve leaking construction or matieral?	x			
39.	480-93-200(8)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities Enumclaw is part of the city and other departments are updated whenever changes occur. Last change 5-7-08	х			
40.	480-93-200(9)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m. Started in early 2008 to put out daily construction schedule	х			
41.	480-93-200(10)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required Part of this Standard inspections includes a Drug and Alcohol inspection	x			

Document Title	Document Number	Revision Date	Date Range Reviewed	Pct of Data Reviewed
·				
•				

Comments:

AOC 3

WAC 480-90-328

Gas utilities must identify each meter by a unique series of serial numbers, letters, or combination of both, placed in a conspicuous position on the meter, along with the utility's name or initials. Utilities must update the name or initials on its meters within three years of a name change.

Finding

The City of Enumclaw does not have Enumclaw's name on their natural gas meters.

	THE Pipes Act of included having					
	it included having operators install excess flow valves starting 6, 2008. DIMP rule is not out but PHMSA is encouraging operators to voluntarily start installing excess flow valves. a. Enumclaw wants be small Business Operator and not subject to the 6 or 7 criteria that would require them to follow DIMP. They have less than 12000 customers and less than 500 employees New customers notified, within 90 days, of their responsibility for those service lines not maintained by the operator			Ű.	N/A	N/C
42.	192.16		х			
43.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381?	·x			
44.	192.383	the program meet the requirements outlined in §192.383? Are records adequate? Started installing EFVs on all new services in March 2008. At this time customers are still asked to fill out the EFV customer Agreement form. Reviewed form during	x			
45.	192.383	O&M inspection If no voluntary program for EFV installations, are customers notified in accordance with §192.383? Are records adequate? NA	х			

Document Title	Document Number	Revision Date	Date Range Reviewed	Pct of Data Reviewed
mments:				
		•	·	• •
			•	

		CONSTRUCTION RECORDS	S	U	N/A	N/C
46.		OQ records for personnel performing New Construction covered tasks Reviewed Covered task #804, Damage Prevention During Excavation Activities				
		In previous inspection, Enumclaw agree to have list of tasks that each employee can do. And I reviewed the list for each employee. Employees can be trained above job classification and not be allowed to do job. Currently training on similar equipment is occurring but is not formally documented. The new gas manager Ed Hawthorne is putting program together.				
	480-93-013	OQ training ok. Procedure for training – 1 union for theory and hands on 2. In field in Enumclaw work on bench and in field. Enumclaw has practice but nothing written. The training plan used to clear the 2005 order was a rewritten City of Enumclaw policy and a letter with a big picture plan dated 1-26-2007. When the City submitted the new policy they had not updated the revision date. During the inspection the date still had not been updated.	x			
		Big Picture Training Plan not implemented, Gas Manager was supposed to do it and there is no documentation of implementation and there is no documentation of training. It is Enumclaw's practice to do continual training in the field but there is no specific documentation, although you can see who Mark is working with on the timesheets. Enumclaw training is ok but the big picture plan said they were going to develop an apprenticeship program etc. Enumclaw has not done anything with an apprenticeship and there were no plans when the inspection was conducted.				
		Training on new O&M consisted of how to navigate the electronic manual and as the manual was being reviewed it turned into a discussion of what needed to become Enumclaw specific. This is not considered training. The new Gas Manager has started Wed morning O&M training. They are slowly covering the manual	·			-
47.	192.225	Test Results to Qualify Welding Procedures Found in Enumclaw's O&M manual, procedure 4-I and supporting documentation is found in permanent gas record file	x			
48.	192.227	Welder Qualification Each individual records are kept in Welding files in office	х			
49.	480-93-080(1)(a)(iv)	Appendix C Welders re-qualified 2/Yr (7.5Months) Done every 6 month O&M 4-I 2.2.2 (c) Mark V and Scott Nichols are appendix C welders — Reviewed Marks 2-7-08 AND Scotts dated 12-20-07 form tilted Current Welder Qualification. Scott is due now, A Tony Smith from local 32 does the destructives tests on form titled Current Welder Qualification.	x			
50.	480-93-080(2)	No ONE INTERNALLY QUALIFIED TO DO ARC WELDING Plastic pipe joiners re-qualified 1/Yr (15 Months) Mark V (12-5-07), Kelly Oles (8-13-07), Scott Nichols (11-1-07) and Chuck Speece (11-1-07). Reviewed Heat Fusion Joint Production and visual inspection test report for each.	x			
51.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period Enumclaw always requalified	х			
52.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners 1/Yr (12Months) Enumclaw does not track production joints	х			
53.	480-93-115(2	Test leads on casings (without vents) installed after 9/05/1992 O&M Section 4-N 4.3(d) Code does not apply to services it does to mains • Map C12N installed in 1994, no test station on map, - Actually Casing installed prior to 1992 and a new pe service ran from farm tap in 1994. • Map C9 casing no test station Ok, There is test station on c9	x			

		CONSTRUCTION RECORDS	S	· · · U	'N/A'	N/C
54.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains No longer install casings since 1987 when they started installing pe pipe.	х			
55.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services Contractors install casings for services, O&M 4-0,9.8 Enumelaw seals ends with foam	x			
56.	192.241(a)	Visual Weld Inspector Training/Experience Reviewed Heat Fusion Joint Production and visual inspection test report for each. O&M 4.0 4.2, This is task 2402, retraining required every 4 years. Mark qualified 10-21-06 and previous one was 10-21-02 and for Scott N it is same dates as Mark	x			
57.	192.243(b)(2)	Nondestructive Technician Qualification Enumclaw does not do non destructive testing. Contractors OQ kept in contract file	х			
58.	192.243(c)	NDT procedures Enumclaw does not do NDT, they do have a procedure for it that contractors would follow. Contractors OQ kept in contract file	х			
59.	192.243(f)	Total Number of Girth Welds None 2007, In 2006 did HP relocate Hwy 164	x		-	
60.	192.243(f)	Number of Welds Inspected by NDT None 2007, In 2006 did HP relocate Hwy 164 approximately 10% of welds (40)	х			
61.	192.243(f)	Number of Welds Rejected None	х			
62.	192.243(f)	Disposition of each Weld Rejected NA	х			
63.	192.303	Construction Specifications CNG did job and designed it	х			
64.	192.325	Underground Clearance Cole street main was reported to Enumclaw with 2 low cp reads. Enumclaw replaced services and found the main very shallow. Enumclaw concrete contract requires that rebar be inserted into the old concrete and tied into the new concrete to prevent the collapsing. Theory Rebar would support concrete and protect main.	x		,	
65.	192.327	Amount, location, cover of each size of pipe installed	х			
66.	480-93-160(1)	Report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length Enumclaw does not have transmission			х	
67.	480-93-160(2)	Did report describe the proposed route and the specifications for the pipeline and must include, but is not limited to the following items: Enumclaw does not have Transmission			х	
68.	480-93-160(2)(a)	Description and purpose of the proposed pipeline; Enumclaw does not have Transmission			х	
69.	480-93-160(2)(b)	Route map showing the type of construction to be used throughout the length of the line, and delineation of class location as defined in 49 CFR Part 192.5, and incorporated boundaries along the route. Enumclaw does not have Transmission			X	
70.	480-93-160(2)(c)	Location and specification of principal valves, regulators, and other auxiliary equipment to be installed as a part of the pipeline system to be constructed Enumclaw does not have Transmission			х	
71.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed; Enumclaw does not have Transmission			х	
72.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route. Enumclaw does not have Transmission			х	
73.	480-93-160(2)(f)	Proposed corrosion control program to be followed inc specs for coating and wrapping, and method to ensure the integrity of the coating using holiday detection equipment; Enumclaw does not have Transmission		·	x	

		CONSTRUCTION RECORDS	S	U	N/A	N/C
74.	480-93-160(2)(g)	Welding specifications; and Enumclaw does not have Transmission			х	
75.	480-93-160(2)(h)	Bending procedures to be followed if needed. Enumclaw does not have Transmission			х	
76.	480-93-170(1)	Commission notified 2 day's prior to pressure testing pipelines with an MAOP producing a hoop stress ≥ 20% SMYS? Enumclaw does not have Transmission			х	
77.		Pressure tests records at a minimum include required information listed under 480-93-170(a-h) LOOK AT LAST SERVICES AND MAINS AND DEV IF ANY FOR LAST YEARS 93-170 (a-h) Operators must keep records of all pressure tests performed for the life of the pipeline and must document the following information:				
	480-93-170(7)	(a) Operator's name; Muckleshoots no, Bondgard no, 290 th no (b) Employee's name; Muckleshoots yes, Bondgard yes, 290 th yes (c) Test medium used; Muckleshoots yes, Bondgard no, 290 th no (d) Test pressure; Muckleshoots yes, Bondgard yes, 290 th yes (e) Test duration; Muckleshoots yes, Bondgard y, 290 th yes (f) Pipe size and length; Muckleshoots yes, Bondgard yes, 290 th yes (g) Dates and times; and Muckleshoots just duration, Bondgard no just duration, 290 th no (h) Test results. Muckleshoots yes, Bondgard does not say passed just assumes, 290 th no		x		
		Reviewed 11-9-07 completed job and pressure tested, Muckleshoot's Veterans Plat at 392 nd and 164 th installed 2"pe to new plat including a 2" stub for future plat and sve stubs. City of Enumelaw, Kelly Oles, air to 90 lbs for 16hrs, 1441 ft of 2"pe including service Stubs 9-5-07 passed Reviewed job complete and pressure tested 2-28-07 ½" service at 259 Bondgard installed new ½" pe gas service, Pressure tested 90 lobs for 20 minutes purged 15 seconds				
		Reviewed job completed and pressure tested 8-1-07 main extension at 290 th and 472 nd St 2"pe main extension pressure test 90 psig for 1 hr purged 30 seconds 100% gas				

		CONSTRUCTION RECORDS	S	U	N/A	N/C
78.		PV 13. WAC 480-93-170 (7) (a)-(h) Tests and reports for pipelines.				
		Each gas pipeline company must keep records of all pressure tests performed for the life of the pipeline and must document the following information: (a) Gas Pipeline Company's name: (b) Employee's name;				
		(c) Test medium used;	1			
]		(d) Test pressure;				
		(e) Test duration;		•		
		(f) Line pipe size and length;				
		(g) Dates and times; and			i	
		(h) Test results.				i I
		Finding 2007 pressure test records for the following locations did not have the required information 1. The 2007 Muckleshoots extension did not have the a. Operator's name b. time pressure test started and ended 2. The 2007 Bondgard extension/service did not have the following a. Operator's name		х		
		b. Test results				1
		3. The 2007 290 th extension did not have the following				
		a. Operator's name b. Pipe length		i		
79.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed? See question 77	х			
80.	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule) Reviewed 2008 and 2007 Equipment Calibration Log for the pressure charts ands gauges	x			
81.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig Nothing lowered or moved	х			
82.	480-93-175(4)	Leak survey within 30 days of moving or lowering pipelines ≤ 60 psig NA	х			

Document Title	Document Number	Revision Date	Date Range Reviewe

S-Satisfactory U-Unsatisfactory N/A-Not Applicable N/C-Not Checked If an item is marked U, N/A, or N/C, an explanation must be included in this report.

	3.00-2.0	-
1		*
1		

Comments:

AOC 5.The 2008 O&M Manual is missing at least two electronic links. The missing links may have lead to probable violations or could lead to future probable violations. Consequently, Enumclaw did not do leak survey from the point of damage back to the service tie in. This is may have lead to probable violation #16

		OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
83	· 192.517(a)	Pressure Testing (operates at or above 100 psig) – useful life of pipeline	х			
84	· 192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – 5 years	х			
85	•	Procedural Manual Review – Operations and Maintenance (1 per yr/15 months)				
		PV1. WAC 480-93-180 (1) Plan and Procedures Each gas pipeline company must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the gas pipeline company's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline Company's associated contractors.				
		Enumclaw has previously been notified in Dockets 040525, 021283, 000955, 990605, 971569,951569, 951343, 940908, 930308 and 051609 of probable violations regarding Plans and Procedures.				
	192.605(a)	Finding: Enumclaw's Operations and Maintenance (O&M) Manual does not include plans and procedures for all CFR 192 and WAC 480-93 requirements, each of the following items were not in the O&M Manual when it was implemented in February 2008.	:	х		
		Enumclaw's O&M Manual, Procedure 2-O, Section 5.3 does not include a procedure to gain access to conduct an atmospheric corrosion inspection at locations where access is unavailable during the initial inspection.				
		 Enumclaw's O&M Manual, Procedure 2-D, Section 4.3 does not include a method, such as a list, to identify pre existing high occupancy structures. Enumclaw's O&M Manual, Procedure 2.O. Section 5.5 does not accurately reflect the intent of the CFR 192.465(e) and determine the areas of active corrosion by electrical survey. 				

		OPERATIONS a	and MAINTENANCE RECORDS	S	U	Ñ/A	N/C
		4.	Enumclaw's O&M Manual does not have a written procedure to document that pressure recording charts have been installed,				
			interpreted and the procedure documented, in accordance with WAC				
İ			480-93-180 by a trained person.]			ļ
		5.	Enumclaw practice is to inspect every valve annually and this				
		٥.	practice is not in the O&M Manual.				
			practice is not in the Octor Manual.				
		Probable Violation	5		٠		
			2.13 (c) what general requirements apply to pipelines regulated				
		under this par					
İ		under this par	c) Each operator shall maintain, modify as appropriate, and				
			follow the plans, procedures, and programs that it is				
			required to establish under this part.				
			Enumclaw has previously been notified in Dockets 930308,	1			
	· ·		940908, 951343 and 000955 of probable violations regarding				
			general requirements.				
			Title Africa				
			Finding a: Enumelaw did not provide adequate training in order to implement				'
			the new O&M Manual including policies and procedures to ensure				
			pipeline safety of the system. Enumclaw's training consisted of how				
			to navigate the electronic version of the O&M Manual.				
			procedure covers remedial action and requires it to be completed			n	
			within ninety days				į
•		Finding					
			Enumclaw did not follow its plans, procedures and programs in the O&M Manual:				
			1. Procedure 4-E, Section 2.1 (d): This procedure covers				ļ
			updating maps within six months of the completion of a				
			construction activity and making them available to				
			appropriate operating personnel. As an example,				
			Enumelaw has different revision dates on the half section				
			Map G1 and the quarter section Map G1.				
			2. Procedure 4-P, Section 5.2 (c) (2): This procedure				
l			requires service regulator vents and relief vents to		*.		
			terminate outdoors, and the outdoor terminal shall be				
			located at a place where gas from the vent can escape				
		:	freely into the atmosphere. An example is service regulator				
l			at Pete's pool.				
* -			3. Procedure 2-O, Section 6.1 (d): This to correct any				
1			cathodic protection deficiencies known and indicated by				
l			any test, survey or inspection. Enumclaw did not complete				
i			or did not document that remedial action was completed				
1			within 90 days. An example is between Cole Street and				
1			Initial Street addressed at either 1522 or 1518 Cole.				1
l			·			<u> </u>	<u></u>

	OPERATION	S and MA	AINTENANCE RECORDS	S	U	N/A	N/O
		4.	Procedure 4-E, Section 2.3.2: This procedure requires that				
			measurements shall begin at the centerline or property line				1
1			of an intersecting street or at a permanent structure and				
			provides detailed instructions for measurements. The				
			completed Enumclaw jobs reviewed did not have the				
			required measurements.				
		5.	Procedure 2-P, Section 4.1 (d): This procedure requires				
		٠,	that it is necessary to determine and document the				
			perimeter of the leak area and check it with a combustible				
			gas indicator (CGI). On the Leak Repair Report for a bad	5			
			weld at Roosevelt at 104" West of the centerline of				
			Forman the perimeter of the leak was not identified.	1			
		6.	Procedure 2-O, Section 6.4: This procedure requires	3			
}		0.	remediation to be documented on form 2-O-3, Corrosion				
			Control Remedial Action Report. Enumclaw does not				
1							
		7.	consistently use this form.				
		7.	Appendix 3-B-2, the Gas System Service Order form was				1
			not used. Enumclaw started using the form after the 2008				
		0	Standard inspection was completed.				
		8.	Procedure 1-G, Section 3.2 (2): This procedure requires				
			the number of third party damages incurred to be included				
'			in the Damage Prevention Statistic Report. Enumelaw did				
			not have an accurate count of third party damages				
İ		_	incurred.	i i			
		9.	Procedure 2-D, Section 9 (b): This procedure requires gas				
			lines leak surveyed every day to be color coded on the leak				
			survey map. Enumelaw used maps that did not show all				
			the facilities to be leak surveyed, making it impossible to				
			color code the facilities leak surveyed. The map that				
			Enumclaw conducted its 2007 High Pressure leak survey				
			on is an example.				
		10.	Procedure 2-D, Section 4.4 (e): This procedure requires				l .
			that after third party excavation damage to services, a gas				
1 :			leak survey shall be performed from the point of damage				1
			to the service tie in. The intent of this WAC was clearly to				
			have a leak survey conducted at the time of the repair.				
		11.	Procedure 2.0, Section 5.3 (a): This procedure requires	l			
*			each pipeline or portion of pipeline that is exposed to the				
			atmosphere to be inspected for evidence of atmospheric				
			corrosion at least once every 3 calendar years but with				
			intervals not exceeding 39 months. In 2006 and 2007	[1
			atmospheric corrosion inspections, Enumclaw did not meet				1
			the 3 year not to exceed 39 month requirement.				1
		12	Procedure 2-O, Section 5.3: This procedure requires				
		12.					1
· ·			grading the atmospheric corrosion conditions found.				
}			During the 2006 atmospheric corrosion inspection, grading				
			that was not approved in Enumclaw's O&M Manual was				
i	·		used at least nine times.	ı l			l

OPERATIONS and MA	INTENANCE RECORDS	S	U	N/A	N/C
OPERATIONS and MA 13.	Procedure 2-O, Section 5.3 (c) requires that when a condition 2 is found during an atmospheric corrosion inspection, remediation must be completed in 12 months. Enumclaw did not complete the 2006 atmospheric corrosion remediation for the 2006 atmospheric corrosion inspection in the required time frame. 1. 3429 McHugh Place, inspected on 7-24-2006, cleaned and coated on 7-26-2008 2. 3136 Academy Dr SE, 7-24-2006 inspected, 7-26-2007 cleaned and coated 3. 3133 Academy Dr SE, 7-24-2006 inspected, 7-26-2007 cleaned and coated 4. 3132 Academy Dr SE, 7-24-2006 inspected, 7-26-2007 cleaned and coated 5. 5302 33nd Street SE and Academy Dr SE, 7-24-2006 inspected, 7-26-2007 cleaned and coated 6. 1940 Wilson, 7-24-2006 inspected, 7-26-2008 cleaned and coated 7. 3429 McHugh Place, 7-24-2006 inspected, 7-26-2008 cleaned and coated 8. 20625 SE 436th Street, 7-24-2006 inspected, 7-26-2008 cleaned and coated 9. 24112 SE 440th St, 7-24-2006 inspected, 7-26-2008 cleaned and coated 10. 1856 Loraine Street, 7-24-2006 inspected, 7-26-2008 cleaned and coated 11. 23123 SE 464th Street, 7-24-2006 inspected, 7-26-2008 cleaned and coated 12. 1192 Harding Street, 7-31-2006 inspected, 7-26-2008 cleaned and coated 13. 1185 Harding Street, 7-31-2006 inspected, 8-8-2008 cleaned and coated 14. 1121 Garfield Street, inspected 7-31-2006, 8-8-2008 cleaned and coated 15. 3245 Academy Dr SE, inspected 7-31-2008, 8-8-2008 cleaned and coated 16. 3335 Academy Dr SE, inspected 7-31-2008, 8-8-2008 cleaned and coated 17. 3339 Academy Dr SE, inspected 7-31-2008, 8-8-2008 cleaned and coated 18. 3443 Academy Dr SE, inspected 7-31-2008, 8-8-2008 cleaned and coated 19. 3525 Academy Dr SE, inspected 7-31-2008, 8-8-2008 cleaned and coated 20. 3607 Academy Dr SE, inspected 7-31-2008, 8-8-2008 cleaned and coated	S	Unit	N/A	
	 3007 Academy Dr SE, inspected 7-31-2008, 8-8-2008 cleaned and coated 3245 Academy Dr SE, inspected 7-31-2008, 8-8-2008 cleaned and coated 3611 Academy Dr SE, inspected 7-31-2008, 8-8-2008 cleaned and coated 				

		OPERATIONS and MA	INTEN	ANCE RECORDS	S	U.	N/A	N/
			23.	3617 Academy Dr SE, inspected 7-31-2008, 8-8-				
				2008 cleaned and coated				
			24.	825 Myrtine Street, inspected 8-2-2006, 8-7-				
				2008 cleaned and coated				
	,		25.	755 Myrtine Street, inspected 8-2-2006, 8-7-				
				2008 cleaned and coated				
			26.	741 Myrtine Street, inspected 8-2-2006, 8-7-				-
				2008 cleaned and coated				
•			27.	706 Myrtine Street, inspected 8-2-2006, 8-7-				
				2008 cleaned and coated				
	•		28.	718Myrtine Street, inspected 8-2-2006, 8-7-2008				
				cleaned and coated				
	· ·		29.	2164 Griffin Ave, inspected 8-2-2006, 8-7-2008				١.
				cleaned and coated				
			30.	2133 Montgomery Ave, inspected 8-2-2006, 8-				
		,		7-2008 cleaned and coated				
			31.	38302 Auburn Enumclaw Road, inspected 8-2-				
		•		2006, 8-5-2008 cleaned and coated				
			32.	16050 SE 380th Place, inspected 8-2-2006, 8-5-				
				2008 cleaned and coated				
			33.	37654 Auburn Enumclaw Road, inspected 8-2-			1	
				2006, 8-5-2008 cleaned and coated				
	*		34.	36809 Auburn Enumclaw Road, inspected 8-2-				1
				2006, 8-5-2008 cleaned and coated				
			35.	36823 Auburn Enumelaw Road, inspected 8-2-				l
				2006, 8-5-2008 cleaned and coated			ļ	
			36.	38302 Auburn Enumelaw Road, inspected 8-2-			ļ	
				2006, 8-5-2008 cleaned and coated				
			37.	36901 Auburn Enumclaw Road, inspected 8-2-			ļ	-
				2006, 8-5-2008 cleaned and coated				
			38.	37927 Auburn Enumclaw Road, inspected 8-2-				
				2006, 8-5-2008 cleaned and coated				
			39.	46919 244th Ave SE, inspected 8-2-2006, 8-8-		٠.		
				2008 cleaned and coated				[
			40.	47007 244 th Ave SE, inspected 8-2-2006, 8-8-				
			•	2008 cleaned and coated				
			41.	24401 Mud Mountain Rd, inspected 8-2-2006, 8-				
				8-2008 cleaned and coated				
		-	42.	24415 Mud Mountain Rd, inspected 8-2-2006, 8-				1
	•			8-2008 cleaned and coated				
			43.	24431 Mud Mountain Rd, inspected 8-2-2006, 8-				
			= 7	8-2008 cleaned and coated				
			44.	24521 Mud Mountain Rd, inspected 8-2-2006, 8-				
				8-2008 cleaned and coated				1
		,	45.	24531 Mud Mountain Rd, inspected 8-2-2006, 8-				
				8-2008 cleaned and coated				
		,	46.	24714 Mud Mountain Rd, inspected 8-2-2006, 8-				
				8-2008 cleaned and coated				1

		OPERATIONS and MAINTENA	NCE RECORDS	S	U	N/A	N/C
		47.	24706 Mud Mountain Rd, inspected 8-2-2006, 8-				
		~	8-2008 cleaned and coated				
		48.	24324 SE 473 Street, inspected 8-2-2006, 8-9-				
			2008 cleaned and coated				
		49.	24415 SE 473 Street, inspected 8-2-2006, 8-9-				
			2008 cleaned and coated				
İ		50.	46908 244th Ave SE (garage), inspected 8-2-				
			2006, 8-9-2008 cleaned and coated	l			
		51.	24418 SE 469 th Street, inspected 8-2-2006, 8-9-				
			2008 cleaned and coated				
	•	52.	46618 244 th Ave SE, inspected 8-2-2006, 8-9-				
		· ·	2008 cleaned and coated				
		53.	43815 236 th Ave SE, inspected 8-4-2006, 8-8-	Į.			
			2008 cleaned and coated	ŀ			
		54,	24625 SE 448th Street, inspected 8-4-2006, 8-9-				
l			2008 cleaned and coated				
l		55.	2718 Warner Ave W, inspected 8-8-2006, 8-7-				
			2008 cleaned and coated				
		56.	119 Semanski Street South, inspected 8-8-2006,	ŀ			
			8-7-2008 cleaned and coated	•			
		57.	123 Semanski Street South, inspected 8-8-2006,				
			8-7-2008 cleaned and coated	l			
		58.	2706 Roosevelt Ave, inspected 8-8-2006, 8-7-				
			2008 cleaned and coated				
		59.	23930 SE 468 th Way, inspected 9-8-2006, 8-8-				
			2008 cleaned and coated	ŀ	:		
		60.	23802 SE 468 th Way, inspected 9-8-2006, 8-8-				
		1.	2008 cleaned and coated				
		61.	23212 SE 464th Street, inspected 9-8-2006, 8-8-	ŀ			
			2008 cleaned and coated		İ		
		62.	23132 SE 464 th Street, inspected 9-8-2006, 8-8-				
			2008 cleaned and coated				
		63.	22505 SE 464 th , inspection 9-8-2006, 8-8-2008				
			cleaned and coated				
	102 (05/1)/2)	Availability of construction records, n	naps, operating history to operating personnel	1			
	192.605(b)(3)	All trucks have maps, O&M's and	2 computers that can go on trucks	Χ.			
			s updated within 6 months of completion of				
		construction activity?					
	480-93-018(3)		the maps because they are a municipality and				
	`		mclaw consultant said everyone should have]	х		
		disclaimer					
	·	<u> </u>					

		OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
-		The Rev date on the maps is actually the print date. Practice is to send maps to Cad person once every 3 months. Maps in trucks not updated when new maps are received from Cad person.				
		Unknown the actual revision date unless Cad person knows when she worked on individual map		-		
		Service material not always noted. REg stations not shown. Material not shown. Missing farm tap symbols. Academy main gate is not on map T20N. AOC MAPPING ERROR –				
		reg stations all named on maps except the Davis Plat reg station and Enumclaw will add its named to the map.				
		Have 9 reg stations in system. Suggested have some way to identity a number or name on the map for the reg station, will be easier to id relief, lock up etc with each station				
		Buss Dist maps -color coded Marker maps -Enumclaw has list HP maps -on maps CP anodes not mapped —on list			٠.	
		Have HP markers are marked with pen with a number and know if they are missing Appendix 2-D-5 of manual 2 and procedure 2 D Section 1(d) Request and reviewed list has list of all required markers and bridge crossing				
		Truck had updated maps with wrong update dates. The revision date was used	<u> </u>			
		PV 14 WAC 480-93-018 (1) Records. Each gas pipeline company must maintain records sufficient to demonstrate compliance with all requirements of 49 CFR §§ 191, 192 and chapter 480-93 WAC.				
		Finding Enumclaw did not update its maps within 6 months 1. For the 2007 five year leak survey, quarter section map G 1, dated 1/16/2007 was used. The quarter section map was less complete that the half quarter map G1 dated 9/18/06.				
	·	2. The map used for the 2007 High Pressure Leak Survey did not have a revision date one it. Enumclaw must include both the accurate print date and revision date.				

PPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
PV15. WAC 480-93-018(5) Records				
Each gas pipeline company must update its records within six months of when it completes any construction activity and make such records available to appropriate company operations personnel.				
Finding a:				
Enumclaw did not accurately update its records when it completed construction activity as demonstrated by the following items:				
1. There is no indication of the system pressure. This could be extremely dangerous for an employee who is unfamiliar with the pressures.				
 a. On Map E-6-S, a 4"steel main with a note "EOP Zone HP 4" on Osceloa Street and Warner Street change from 4" steel to 4" HP steel. Intermediate pressure cannot come directly off HP. b. On map E-8-S at the intersection of 228th Ave Se and 				
SE 448 th Street a 2" pe main comes directly off the 6" HP steel line. Intermediate pressure cannot come directly off HP.				
 2. There is no indication of pressure regulation (missing farm tap symbols) on the follow maps: a. On Map T-19-S, T-19-N, T-20-S or T-20-N at 37th and the GSB line where the 6" HP changes to 2" Steel b. On Map V-17-S, a 2"pe main (installed in 1989) 				
comes off the 6" HP line across the street from 37978 Auburn Enumclaw Rd SE. c. On Map Z-15-S, the 6" HP (installed in 1957) changes to 2"pe near 41531 Auburn Enumclaw Rd SE				
 d. On Map B-14-N, near 42703 Auburn Enumclaw Rd is a 1 ½" steel main going south off the 6"HP. e. On Map B-14-N, near 42703 Auburn Enumclaw Rd is a 2" pe main going north off the 6" HP line f. On Map C-10-N, near 21928 SE 436th is the steel 				
service crossing 436 th , coming off the 6" HP line (installed in 1957)				
g. On Map C-13-N, at the intersection of the Auburn Enumclaw Rd and 196 th Ave SE is a 2"pe main that comes off the 6" HP line				
3. The transition point from steel to pe on the following mains and services				
a. On Map A-6-S, near 42222, where the 2" steel main changes to 2" polyethylene				
b. On Map F-6-N, at the intersection of Osceola and McDougall Ave where the 6"HP changes to 4" HP				

		OPERATIONS and	MAINTE	NANCE RECORDS	S	U	N/A	N/C
		4.	The Mate	erial type (steel or pe) on the following mains and				
			a.	Map C-10-N, the service near the bottom center, there				
1				is a service line on SR 164 that comes off the 6" HP	[
	·			line				
			b.	On Map A-4-S, the services at 42121 42213 and 42229 264 th Ave SE.				
			c.	On Map A-6-S, the service at 42222 252 nd Way SE				,
	'		d.	On Map A-8-N, the main on 228th Ave SE the,				
			e.	On Map A-8-N, the service at 41920 228 th Ave SE				
			•	and the services across the street				
ı			f.	On Map A-8-S, the main on 228 th Ave SE				
ı			g.	On Map A-8-S, the service at 42411 228 th , the 1 st				
			6.	service north of 424 th the service at 42406 228 th ,				
ı		*		42109 228th, the stub at 42024 228th and the service				
ı				at 41925		:		
			h.	On Map A-9-N, the main on 228th Ave SE	-			
ı			i.	On Map A-9-N, ten services/stubs on SE 419 th St Ave				
				SE				
ı			j.	On Map A-9-S, the main on 228 th Ave SE				
ı			k.	On Map A-9-S, six services on 228 th Ave SE				
ł			1.	On Map B-4-S, eight services on 260 th				
ı		·	m.	On Map B-4-N, four services 266th Ave SE		,		
ı			n.	On Map B-4-N eight services on SE 427 th				
ı			0.	On Map B-4-N, nine services on 260 th Ave SE				
'		•	p.	On Map B-4-S, ten services on Shannon Lane				
ı			q.	On Map B-4-S, 13 services on McHugh Ave				
ı			r.	On Map B-4-S, three services on McHugh Place		ĺ		
ŀ			S.	On Map B-5-N, ten services 260 th Ave SE				
	<u> </u>		t.	On Map B-5-S, 15 services on McHugh				
I	· ·		u.	On Map F-7 N on SE 456th Street there is a 6"HP				
				main with no information on the map		,		
			ν.	On Map C-10 N, on Auburn Enumclaw Rd the 6"HP				
I]		, .	main with no information on the map				,
	,	,	w.	On Map Y-15 S 6" HP steel main not identified				

		OPERATIONS and	MAINTE	NANCE RECORDS	S	U	'N/A	N/C
		5.	The pipe	size on the following mains and services				
			a.	Map C-10-N, the service near the bottom center, there	:			ĺ
			•	is a line on SR 164 that comes off the 6" HP line				ĺ
			b.	On Map A-8-S, main on 228th Ave SE				
			c.	On Map A-9-N, main on 228th Ave SE,				
		,	d.	On Map A-9-N, two services without addresses 228 th Ave SE				
			e.	On Map A-9-S, main on 228 th Ave SE				
			f.	On Map A-8-N, main on 228th Ave SE the,				
			g.	On Map B-4-N, nine services on 260th Ave SE				
			h.	On Map B-4-N, six on 266 th Ave SE				
			i.	On Map B-4-S, six services on 260th Ave SE				
			j.	On Map B-4-S, seven services on McHugh AvE				
			k.	On Map B-5-N, eight services 260 th Ave SE has, 10 dates,				
			1.	On Map B-5-S, 26 services on the map				
	,		m.	On Map F-7 N, on SE 456 th Street there is a 6"HP				
				main not marked on the map				
			n.	On Map C-10 N, on Auburn Enumclaw Rd the 6"HP				
	1			main with no information on the map				
	·		o.	On Map Y-15 S 6" HP steel main not identified				
		6.	The insta	Il dates on the following mains and services				
			a.	On Map V-17-S, 37978 Auburn Enumclaw Rd SE,				
			b.	On Map V-17-S, 16050 SE 380th Place,				
			c.	On Map C-10-N, near 21928 SE 436th				
			d.	On Map A-4-S, 42121, 42213, and 42229 264 th Ave SE.				
		·	e.	On Map A-6-8, 42312. 42222 and 42132 252 nd Way				
				SE				
			f.	On Map A-8-N, main on 228 th Ave SE the,				
			g.	On Map A-8-S, main on 228th Ave SE				
			h.	On Map A-9-N, main on 228 th Ave SE,				
			i.	On Map A-9-N, two services without addresses on 22 ^{8th} Ave SE				
			j.	On Map A-9-S, main on 228th Ave SE				
			k.	On Map B-4-N, ten services on 260th Ave SE				
		•	1.	On Map B-4-N, fourteen on 266 th Ave SE				
			m.	On Map B-4-S, eleven services on 260th Ave SE		٠,		
			n.	On Map B-4-S, eleven services on Shannon Lane	1			
			0.	On Map B-4-S, 34 services on McHugh Ave				
			p.	On Map B-5-N, ten services 260 th Ave SE				
1			q.	On Map B-5-S. 43 services on the map				
			r.	On Map F-7 N, on SE 456 th Street there is a 6"HP	1			
				main not marked on the map				
			S.	On Map C-10 N, on Auburn Enumelaw Rd the 6"HP				
			+	main On Map Y-15 S 6" HP steel main				
			t.	On map 1-13 50 fir seed main			<u> </u>	

	OPERATIONS and MAINTENANCE RECORDS	S	U	-N/A	N/C
	7. There is no addresses for services on a. Map C-10-N, near the bottom center, there is a service line on SR 164 that comes off the 6" HP line (installed in 1957) b. On Map C-12-N, farm tap (installed in 1994) with four services on it, located across from 2299 SE 436th, near the center of the map c. On Map A-9-N, the two services on 228th Ave SE d. On Map A-9-S, the service near the intersection of				
	424 th and 228 Ave SE and the service across the street from 42109 228 th Ave SE 8. Map S-20-S there is a line marked customer piping tied into a 2" pe Enumclaw main. Location is on the east side of the map, there are no addresses.				ı
	Finding b: Enumclaw did not make updated maps available to its personnel during the following leak surveys: 1. The map that Enumclaw conducted its 2007 High Pressure Gas Leak Survey with did not have a revision date on it and Enumclaw could not document that the map had been updated within 6 months. 2. The map that Enumclaw conducted its 2007 five year leak survey for Section 1, G-1 had a 1/16/2007 revision date. The survey was conducted on various dates in April of 2007 and all gas mains were not on the map. The employee leak surveyed and highlighted the areas where he believed the mains were. Staffs review found that the mains not on the map had been installed for over six				
192.605(b)(8	months. Periodic review of personnel work — effectiveness of normal O&M procedures Enumclaw doing on O&M review sheet but Inadequate documentation for review of personnel work. Does but document effectiveness of personnel because they are small and Mark remembers crew observations and conversations. Enumclaw will add documentation of both to O&M review form	x			
192.609	Class Location Study (If pipeline operating at >40% of SMYS) NA	x			
 192.614	Damage Prevention (Miscellaneous) Member of local Underground Coordinating Council. Jim used to attend now Ed is attending. Enumclaw does its own locating - all gas field employees do locating. Employees check maps in the office before they do the locate.	х			
192.615(b)(1)	Location Specific Emergency Plan O&M with Emergency Plan in every truck and in Ed's office and in the Gas Bay	х			
192.615(b)(2)	Emergency Procedure training, verify effectiveness of training Verify by what if section conducted once a year (will be doing quarterly). Was documented on the bottom of the manual sheet in Manual 3 emergency response. It was used as a sign in sheet for the 5/28/08 scenario of the broken 6" HP line.	x			
192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed. Reviewed Manual page with sign in at bottom for quarterly scenario of an emergency.	x			

		OPERATIONS and MAINTENANCE	RECORDS	S	Ü	N/A	'N/C
	192.615(c)	Hall Tribal Council, Doug Dawson, Enumo Mimi Jenson Enumelaw police Dept; Dave	Schmidt, City of Buckley: Eric Robertson No Documentation of meeting with Sheriff,	x			
	192.616	Public Awareness Program					
	192.616(e&f)	city, all contractors message type and content, includes one call	wed brochure that is sent to every address in information, what to do if you smell gas, address, city web TV, paper, contractors, bill ag updated by new manager a Public Gas Assoc made a company named viewed GOAL results it is very detailed eipts, return receipts, audience contact er, public officials, program evaluation	x			
		Operators in existence on June 20, 2005, mater than June 20, 2006. See 192.616(a) an	ust have completed their written programs no d (i) for exceptions.	x			
			ommended Message Deliveries				
		Stakeholder Audience (LDC's)	Baseline Message Frequency (starting from effective date of Plan)		132		
		Residence Along Local Distribution	Annual – Bill stuffer				
		LDC Customers	Twice annually- Bill stuffer 2xs a yr, also web TV, excavator, city web page, paper, and brochure. Does not have dates it was done was suppose to be June and September per				
ļ.		Emergency Officials	Annual- Reviewed local 2008 contacts and new gas manager is developing new list and contracting				
		Public Officials	3 years-Reviewed local 2008 contacts and new gas manager is developing new list and contracting				
		Excavator and Contractors	Annual- Databar Co. made brochure and stuff in 5-07 and mailed – NOT set out for 2008 yet because brochure is being updated-				

		OPERATIONS and MAINTENANCE RECORDS	Ś	Ü	N/A	N/C
		* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.				<u> </u>
	Paragraphic Residence	The public Awareness Plan has not been updated as a result of evaluations				
		Goal results is program evaluation but no documented review of effectiveness of program and no improvements made yet				
·		Copy not given to upper management. Upper management informed verbally				
	192.616(g)	The program conducted in English and any other languages commonly understood by a significant number of the population in the operator's area. Enumclaw determined that English was adequate	x			
	192.617	Analyzing accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 No material failure that needed analysis	х			
	192.619	Maximum Allowable Operating Pressure (MAOP) Established by waiver	х	-		
	480-93-015(1)	Odorization of Gas - Concentrations adequate				
		Monthly Odorant Sniff Testing Test Sites 1. 243 Pearl Buckley Shops, Buckley Shop 2. Ryan Rd- Well House, in Buckley 3. 2041 Railroad- here 4. Auburn Academy- Swimming Pool Metr				
	480-93-015(2)	To ensure that Enumclaw had adequate odorant test sites during the field OQ inspection, odorant reads at the Desanto Greenhouse and at Thunder Mt Middle School were taken. These are the extremities of the system	x		<i>j</i>	
		Enumclaw started using new form in 2008 it is odor check report and it will be updated to include chart. Reviewed the 2006 and 2007 odorization check reports				
	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements Enumclaw never had bad read	x			
	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) Reviewed calibration record for 2006, 2007 and 2008	x	-		
	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months) Reviewed Bridge, Railroad and Highway crossing form. It records map#, insulation check (between casing and pipe) leak check at vent, marker condition and cp reads on casing and carrier pipe. This done quarterly because of casing. Enumclaw has a list of marker locations	x			
		Requested list of markers, bridge crossing and 3 rd on for field need now and received and reviewed the 1. High Pressure system and sign/Marker Patrol 2. Crossing list and 3. Distribution sign/marker Patrol				
	480-93-124(4)	Markers reported missing or damaged replaced within 45 days? Signs are replaced during Bridge patrol but not documented in 2007 on new 2008 Patrol or Leak survey report Form. Enumclaw notes missing markers but did not document when the markers were replaced and who replaced the marker. Normal practice is to replace during the patrol. However, there are metal signs and markers that cannot be replaced during the patrol. Enumclaw was informed they need to document replacement date and who did replacement. (Missing markers were in place during field inspection) Enumclaw was informed during inspection, during mini exit interview, during meeting prior to formal exit interview	x			

		OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
480	-93-140(2)	Service regulators and associated safety devices tested during initial turn-on Reviewed 2008 Cost Sheet for gas meters SETS. Bench test for service regulators was an OQ field test.	x			
480	-93-155(1)	Up-rating of system MAOP to >60 psig? Procedures and specifications submitted 45 days prior?	x			
480-	-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained? Reviewed leak Repair Report. This is report also used for odor calls. Also reviewed associated Pipeline test report for repair that provided air test to house and there was documentation that leak survey was done but no serial number etc for it. Enumclaw new manual has form for service type calls — odors inside Mark had 30 day residual check and leak check from break back to main combined as same thing. Enumclaw says will make another form for odor calls called something like a service call and use the other ones for damage. Enumclaw's new O&M had form for this. Enumclaw started using it immediately Form did not give location of problem or problem. Ie. Odor by hot water heater, no cgi reads Recommend needed more comments i.e. informed customer, note all equipment used, location of where gas leak was and CNG diagram Since Enumclaw thought only blowing gas was damage the Damage Prevention report was only used for blowing gas repairs. Note: exposed pipe reports were filled out for all exposed steel pipe 93-186 2) The operator must check the perimeter of the leak area with a combustible gas indicator. The operator must perform a follow-up inspection on all leak repairs with residual gas remaining in the ground as soon as practical, but not later than thirty days following the repair. ENUMCLAW DID NOT DIAGRAM LEAK AREA WITH CGI READS PV Leak Repair Report NO CGI diagram for reads perimeter of the leak area Part D is the 30 day recheck. Part D Suppose to be with Flame pak form says CGI and no place for flame pak serial number. Form used for all odor calls including inside house. Very confusing. Enumclaw committed to start using a Gas Service Form that is in the manual. No place for location of leak i.e. inside by water heater or front yard PV of 480-93-XXX		x		

Records Review and Field Inspection

S-Satisfactory U-Unsatisfactory N/A-Not Applicable N/C-Not Checked

If an item is marked U, N/A, or N/C, an explanation must be included in this report.

OPER	ATIONS and MAINTENANCE RECORDS	S	Ü	N/A	N/C
PV 11.	Each gas pipeline company must establish a procedure for evaluating the concentration and extent of gas leakage. When evaluating any leak, the gas pipeline company must determine and document the perimeter of the leak area. Enumclaw has previously been notified in Docket 930308 of a probable violation regarding Perimeter of a Leak. Finding At the following locations Enumclaw did not determine and document the perimeter of the leak area: 1. In 2007, at the following locations there was no diagram to document the perimeter of the leak or CGI serial number a. At 38606 Auburn Enumclaw, on 9-7-2007, a steel line was pulled from a dresser coupling. 2. In 2008, at the following locations there was no diagram to document the perimeter of the leak a. At E 1243 Roosevelt on 2/29/2008 Pilchuck repaired a bad weld found on 2-19-2008 by the city while they were wrapping a pipe damaged by a 3 rd party.				
	 Enumclaw did not do leak survey back to main done, did do 30 day rechecks. See all examples 1427 Jefferson one we discussed in detail in inspection. This should have been done on a Patrol or Leak Survey Report The pressure test for repair is done on Pipeline Test Report 				

	OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
	Leaks originating from a foreign source. Take appropriate action to protect life and property regarding the pipeline company's own facilities, and; FORM INADEQUATE 3) When leak indications are found to originate from a foreign source or facility such as gasoline vapors, sewer, marsh gas, or from customer-owned piping, the operator must take appropriate action to protect life and property. Leaks that represent an on-going, potentially hazardous situation must be reported promptly to the owner or operator of the source facility and, where appropriate, to the police department, fire department, or other appropriate governmental agency. If the property owner or an adult person occupying the premises is not available, the operator must, within twenty-four hours of the leak investigation, send by first-class mail, addressed to the person occupying the premises, a letter explaining the results of the investigation. The operator must keep a record of each letter sent for five years.				
480-93-185(3)(a)	AOC 4, WAC 480-93-185(3) - When leak indications are found to originate from a foreign source (for example, a gasoline tank, a sewer, a marsh or customerowned piping), and the situation is ongoing and potentially hazardous, the gas pipeline company must: (a) Take appropriate action regarding its own facilities to protect life and property; and (b) Report the leak promptly to the source facility owner or operator and, where appropriate, to the police department, fire department, or other appropriate governmental agency. If the property owner or an adult person occupying the premises is not available, the gas pipeline company must, within twenty-four hours of the leak investigation, send by first-class mail, addressed to the person occupying the premises, a letter explaining the results of the investigation. The gas pipeline company must keep a record of each letter sent for five years.	x			
	Finding a: The Leak repair Form does not have a place to document foreign leaks or a comment section to note a foreign leak. Enumclaw's O&M Manual Procedure 2-P, Section 4.4 covers foreign leaks. Procedure 2-P, Section 8 Records indicates documentation for all of section 4 (includes foreign leaks) is done on the Leak Repair Form. Finding b: The Leak Repair Form does not have a place or a comment section to document that the owner was notified that a foreign leak letter was sent by US Mail within twenty four hours. Finding c: Enumclaw did not have a procedure in place to record each foreign letter sent for five years.				
480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? In the last 5 years customers have always been home to notify. Procedures do say mail if no adult home. Notifying the customer is not always documented.	x			
	480-93-186(2) Each operator must establish a procedure for evaluating the concentration and extent of gas leakage. When evaluating any leak, the operator must determine and document the perimeter of the leak area.				
480-93-186(3)	Leak evaluations: Are follow-up inspections performed within 30 days of a leak repair? Yes,	х			
480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair? Yes, space on form	х			

<u> </u>		OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
	480-93-187	Gas leak records: at a minimum include required information listed under 480-93-187(1-13) The Leak Repair Report and the Gas System Service Order does not have all information		x		
		PV 10. WAC 480-93-187 Gas Leak Records Each operator must prepare and maintain permanent gas leak records. The leak records must contain sufficient data and information to permit the commission to assess the adequacy of the operator's leakage program. Gas leak records must contain, at a minimum, the following information: (1) Date and time the leak was detected, investigated, reported, and repaired, and the name of the employee(s) conducting the investigation; (2) Location of the leak (sufficiently described to allow ready location by other qualified personnel); (3) Leak grade; (4) Pipeline classification (e.g., distribution, transmission, service); (5) If reported by an outside party, the name and address of the reporting party; (6) Component that leaked (e.g., pipe, tee, flange, valve); (7) Size and material that leaked (e.g., steel, plastic, cast iron);				
		(8) Pipe condition; (9) Type of repair; (10) Leak cause; (11) Date pipe installed (if known); (12) Magnitude and location of CGI readings left; and (13) Unique identification numbers (such as serial numbers) of leak detection equipment. \$1,000,000. Enumclaw has previously been notified in Dockets 930308 and 000955 of probable violation regarding Gas Leak Records. Finding a: The leak records did not contain the minimum data and information required to permit the commission to assess the adequacy of the operator's leakage program.				
		1. Gas Leak and Repair Report, dated 9-7-2007, at 38606 Auburn Enumclaw a. Location of the leak (sufficiently described to allow ready location by other qualified personnel). b. Pipeline classification (e.g., distribution main / service). c. The name and address of the outside reporting party. d. Date pipe installed e. Magnitude and location of CGI readings left. f. Unique identification numbers (such as serial numbers) of leak detection equipment.				
		 Gas Leak and Repair Report, dated 8-30-2007, at 1720 McHugh Location of the leak (sufficiently described to allow ready location by other qualified personnel). Pipeline classification (e.g., distribution main/ service). Size and material that leaked (e.g., steel, plastic, cast iron). Date pipe installed Magnitude and location of CGI readings left. Unique identification numbers (such as serial numbers) of leak detection equipment. 				

		OPERATIONS	and MAINTENANCE RECORDS	S	U	N/A	N
		3.	Gas Leak and Repair Report, dated 8-20-2007, at 415th and Auburn				
			Enumclaw		1		
			a. If reported by an outside party, the name and address of				
			the reporting party.				
			b. Date pipe installed		ŀ	j	
			c. Magnitude and location of CGI readings left.				
			d. Unique identification numbers (such as serial numbers) of				
			leak detection equipment.	1			
		,		1 .			
		4.	Gas Leak and Repair Report, dated 8-24-2007, at 415th and Auburn		•		
			Enumclaw		-		
•			a. The time of the repair				
			b. Leak grade.	1			
	·		c. If reported by an outside party, the name and address of				
	·		the reporting party.	1			
			d. Size and material that leaked (e.g., steel, plastic, cast iron).	1			
			e. Date pipe installed			1	
			f. Magnitude and location of CGI readings left.				
			g. Unique identification numbers (such as serial numbers) of				
			leak detection equipment.				
		5.	Leak Repair form dated 4-12-2008, at 1031 Loraine,				
] "	a. The repair date				
			b. The name of the reporting party				
٠			c. The address of the reporting party	1			
			d. The serial number of the leak detection equipment used to		•		
			clear the leak				
		• .					
		6.	Leak Repair Form dated 1/20/2008, at Loraine and Griffin, the				
	,		a. The date and time the leak was detected				
			b. The repair date				
			c. The location of the leak with sufficient detail to allow the ready location				
			d. The name of the person reporting the leak		1		
			e. The address of the person reporting the leak				
			f. The pipe condition				
			g. The cause of the leak				
			h. The date the pipe was installed	1			
		7	Leak Repair Form dated 4/22/2008, at 1427 Jefferson, the				
		7.					
			the state of the s		}		
			b. The location of the leak with sufficient detail to allow the ready location				
			c. The address of the reporting party				
			d. The pipe condition				
			e. The date the pipe was installed				1

	OPERATIONS and MAINTENANCE RECORDS	S	Ü	N/A-	N/C
	 8. Leak Repair Form dated 2/27/2008, at 1243 Roosevelt E, a. The date and time the leak was detected w b. The repair date c. The date the pipe was installed 				
	9. Leak Repair Form dated 2/19/2008, at Roosevelt and 104 feet west of the center line of Farman.a. The date the pipe				
	Gas leak surveys Review all 2007 and 2006 PV 8. WAC 480-93-188 (1) Gas leak surveys Operators must perform gas leak surveys using a gas detection instrument				
	covering the following areas: (a) Over all mains, services \$1,000,000. For the series Enumclaw has previously been notified in Dockets 930308 and 000955 of probable violations regarding Gas Leak Surveys and an AOC in Docket 021283 regarding Gas Leak Surveys.				
480-93-188(1) START on tues	Finding a: Enumclaw's maps do not have measurements for main and service locations on the maps. Without exact measurements, Enumclaw cannot document that they leak surveyed over all mains and services. As an example, Enumclaw's 2007 five year leak survey was conducted with Map 1 G. A portion of the main was not accurately located in the cul-de-sac north of 472 nd Street. The main cuts diagonally across a section of land, it does not make a ninety degree turn into the cul-de-sac. The leak survey highlight marks indicate that the main was leak surveyed as a ninety degree turn not diagonally, proving the leak survey was not conducted over the main		х		
	Finding b: There is not sufficient documentation to demonstrate that during the 2007 High Pressure Gas Leak Survey the high pressure stubs leading to the individual farm taps were leak surveyed. The map used to conduct the high pressure gas leak survey was not of sufficient scale to show the service stub and farm taps.				
480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days) there are additional 2008 records that were not reviewed Reviewed Flame Pack Series 400 for 11-2-07 thru 3-5-08 (AND Gas Track Calibration from 11-5-07 thru 5-2-08 have 4 of those the serial numbers are 49031, 15286, 18466 and 51848. CGI Gas Scope Combustible Gas Indicator serial numbers are 7015 and 6803 from 4-4-07 thru 3-3-08 Detecto Pak II serial 4829 and 781 from 10-1-07 thur 3-3-08	· X			,

		OPERATIONS and MAINTENA	ANCE RECORDS	S	Ū	Ñ/A	N/C
		following circumstances:	must conduct special leak surveys under the (e) After third-party excavation damage to company must perform a gas leak				
		the service tie in at the foldo 1. 1730 M 2. 494 Bo 3. 38606 pulled 4. Lorair was hit 5. 1427	a special leak survey from the point of damage to owing 3 rd party damage locations: 1cHugh, on 8-30-2007, a damaged ½" line andgard, on 9-14-2007, a damaged ½" line Auburn Enumclaw, on 9-7-2007, steel service from dresser coupling the and Griffin on 1-20-2008 a 1 ½" pe service line and Griffin on 4-22-2008 a ½" pe service was ded and repaired.				
	480-93-188(3)	Leak survey frequency (Refer to Ta	ble Below)	х			
See Con	Other M	ness Districts (implement by 6/02/07) High Occupancy Structures Pipelines Operating ≥ 250 psig Mains: CI, WI, copper, unprotected steel	1/yr (15 months) 1/yr (15 months) 1/yr (15 months) 2/yr (7.5 months)				
	480-93-188(4)(a)	repairs		x			
	480-93-188(4)(b)	Special leak surveys - areas where su underground gas facilities, and dama	bstructure construction occurs adjacent to ge could have occurred rvices were damaged. Special survey done McHugh and Cole st	х			
	480-93-188(4)(c)		areas where active gas lines could be affected	х			
	480-93-188(4)(d)	and explosions	nes of unusual activity, such as earthquake, floods,	х			
	480-93-188(4)(e)	perform a gas leak survey from the p 1. Large sewer install survey done after const 2. road improvement	led and services were damaged. Special truction 2-3-06 t project at McHugh and Cole st	x			
		3. road improvement p	project Warner from Watson to Blake				

		OPERATIONS and	MAINTENANCE RECORDS		S	U	N/A	N/C
 480-93	Leak program - Self Audits PV 17 WAC 480-93-188(6) Gas leak surveys Each gas pipeline company must perform self audits of the effectiveness of leak detection and recordkeeping programs. Each gas pipeline company maintain records of the self audits for five years. Self audits must be performas frequently as necessary, but not to exceed three years between audits. A minimum, self audits should ensure that: (a) Leak survey schedules meet the minimum federal and state safety requirements for gas pipelines; (b) Consistent evaluations of leaks are being made throughout the system; (c) Repairs are made within the time frame allowed; (d) Repairs are effective; and (e) Records are accurate and complete.		ne company must nust be performed veen audits. At a e safety		X			
		documentation of self a Reviewed a hand writte	ection, Enumelaw did not conduct and did not had the being conducted prior to 2007. En list on Enumelaw letter head called 2008 Leatation. Later I was told it was not the audit just	nk Detection Audit				
192	2.709	Patrolling (Transmission Enumclaw does not have	on Lines) (Refer to Table Below) .705 ave transmission				х	
		Class Location 1 and 2	At Highway and Railroad Crossings 2/yr (7½ months)	At All Other I				
		3	4/yr (4½ months)	2/yr (7½ moi				
		4	4/yr (4/2 months)	4/yr (4½ moi				
 192	2.709	Leak Survey Enumclaw does not ha				·	х	
		Class Location	Required	Not Excee				
		1 and 2	1/yr	15 month		_		
		3	2/yr	7½ month			•	
 T		4	4/yr	4½ month	is		· · ·	T
192.603(1	b)	Review Patrolling of Bi 10-12-07, 7-17-07, 4-20 documentation that the and 1-16-07 no docum Reviewed 2008 dated 1	trict (4 per yr/4½ months) usiness districts, Enumclaw does 4 times a year 0-07, and 1-16-07. Each time items were noted service at 22919 SE 464 th was replaced. Items ent that remedial action taken18-08 and 4-18-08. Action taken and document or piping that needs to be supported.	but there found on 4-20-07	x			
192.603(1	b)	Patrolling Outside Busi Distribution markers Reviewed Patrolling o Patrol outside buss dis	ness District (2 per yr/7½ months) 192.721(b checked twice a year. Checked on Distribut f High Pressure markers on 8-7 and 8-07 an strict Reviewed for 12-6-07 and 5-9-07 AND rently driving entire system and Reviewed E	ion Patrols ad 1-24-07 Reviewed for 5-	x			
								4

	:S U	Ñ/A	N/Ĉ	
192.603(b)	Leakage Survey - Outside Business District (5 years) 192 .723(b)(1) See Leak survey above	x		
192.603(b)	Tests for Reinstating Service Lines 192.725 Do not reinstate service Lines		x	
192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727 No navigable water in Enumclaw		x	

		OPERATIONS and MAINTENANCE RECORDS	≟:S⊁	U.	N/A	N/C
,	192.709	During Limiting and Regulating Stations (1 per yr/15 months) .739 Reviewed records for all Reg stations for 2007				
		• at 38629 Auburn Rd				
		• 3701 Academy Dr				
		• SE 392 St and Hwy 164			1	
		• 197 th Ave SE/Hwy 164				
	•	Auburn Enumclaw Rd/415 th				
	,	• SR 164/158 th Ave. Ct				-
		Mud Mtn. Rd/Hwy 410				
		• SR 164/408 th			l ·	
		• Warner St				
		• Roosevelt			l	
,		Reviewed 2008 Reg stations that were done on new form 2-L-2 Station inspection report Suggest include area for checking wrap and locks				
		Calculation not asked for and capacity is fine at least everything is operating				
		satisfactorily they are going back and installing petes plugs and valves at farm taps to be in compliance with dist reg.				
		During inspection, Mark did in field inspection of farm taps that Enumclaw thought will become district regulators. During inspection they were not current dist reg, Mark sent				
		crew to check on 6-11 and 6-12-08. Per definition Enumclaw had 5 farm taps turned dist reg The following list indicate customers of farm tap that Enumclaw thought would become dist reg				
		2 customer - 5626 Auburn Way S			ŀ	
	•	3 - 5719 Auburn Way S				
		3-36823 Auburn Enumclaw Rd		.,		:
		2-37127 Auburn Enumclaw Rd		х		
		27326 Auburn Enumclaw Rd – given DO NOT USE				i
		3-151 st Ave SE and Auburn Enumclaw Rd				l
		4-37676 Auburn Enumclaw Rd SE				
		2-37978 Auburn Enumclaw Rd SE				
		13-188 e SE and Auburn Enumclaw Rd				
		PV 18. CFR 192.739 (a) Pressure limiting and regulating stations: Inspection and				ł
		testing			ļ	
		Each pressure limiting station, relief device (except rupture discs), and				
		Pressure regulating station and its equipment must be subjected at intervals				ŀ
		not exceeding 15 months, but at least once each calendar year, to inspections				
		and tests to determine that it isset to control or relieve at the correct			,	
		pressure consistent with the pressure limits of §192.201(a);				
		Finding				
		Enumclaw has five farm taps that by definition are pressure stations and have			·	
		never been inspected annually. Pressure regulator stations are located at the				
		following locations:				l .
·		1. 5719 Auburn Way S				
		2. 36823 Auburn Enumelaw Rd				
		3. 151 st Ave SE and Auburn Enumciaw Rd				
		4. 37676 Auburn Enumclaw Rd SE				
		5. 188 Ave SE and Auburn Enumclaw Rd	l·			
		MASTER METER- Fairgrounds now has 3 individual services				

192.709	Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743 Warner and Roosevelt only Reg stations that have charts. When a chart box set out for calibration there is no chart at reg station. During the inspection Enumclaw put a temp chart in the Warren station. There are 3 other charts in the district. have charts at the THE WARREN AND ROOSEVELT REG STATIONS EXCEPT WHEN THEY ARE REMOVED FOR CALIBRATION. When they are removed for calibration there is no chart at the station but there are 3 inside the district INSIDE THE DISTRICT THEY HAVE CITY SHOPS, FAIRWAY HILLS, AUBURN ACADEMY AND THURNDER MT. – CHARTS INSIDE DISTRICT PROVE THAT MAOP NOT EXCEED.
	At auburn station HP into system is measured with daily telementry (no chart). AOC 6. CFR 192.741 a) Each distribution system supplied by more than one district pressure regulating station must be
	equipped with telemetering or recording pressure gages to indicate the gas pressure in the district. Finding a
	The intent of the code is not to have a pressure recorder at each tap and regulator. As indicated by §192.741(c), the purpose of paragraph (a) is to identify any high or low pressure within a distribution system district which would indicate unsatisfactory operation of a pressure regulator or auxiliary equipment supplying the district with gas. §192.741(a) does not require that pressure gages be placed at regulator stations; they may be located there or at other places within the district. However, the number and location of the telemetering equipment or recording pressure gages must be such that the performance of the regulator(s) and auxiliary equipment is adequately monitored to detect unsatisfactory operation. In order to adequately monitor, all the charts must be read, installed and removed in a timely manner and the proper chart used

		1.	Charts from 3-26-2008 thru 6-25-2008 were reviewed during the inspection. The following charts were missing
			• At the Warner District Regulator Station three low pressure charts for the weeks of 5-28-2008, 6-4-2008 and 6-11-2008 are missing.
			• At the Auburn Academy low pressure charts for the weeks of 3-
			26-2008, 4-2-2008, 4-15-2008, 6-4-2008, 6-11-2008, and 6-
			18-008 are missing.
			2. Charts from 3-26-2008 thru 6-25-2008 were reviewed. The following charts
			did not have chart removal date.
	· ·		At the Warner District Regulator Station
		İ	
			Three High Pressure chart with a start date of 4-2-
			2008, 6-25-2008 and 6-11-2008
			 One Low Pressure chart with a start date of 6-18-
			2008
			At the Roosevelt District Regulator Station
			 High Pressure chart for the week starting 6-4-2008
			■ Low Pressure chart for the week starting 6-4-2008
,	•		At the City Shops
		<u>.</u>	• Four Low Pressure chart for the week starting 4-2-
			2008, 4-9-2008, 5-7-2008 and 5-14-2008
·			At the Auburn Academy
	!		■ Low Pressure chart for the week starting 4-8-2008
		2.	Charts from 3-26-2008 thru 6-25-2008 were reviewed. The following locations had the wrong chart installed.
			At the Warner District Regulator Station
			■ Low pressure chart with a start date of 6-18-2008
			had a 24 hour chart instead of a 7 day chart.
			At the Auburn Academy
			taran da antara da antara da antara da antara da antara da antara da antara da antara da antara da antara da a
			Low pressure chart with a start date of 6-18-2008
			had a 24 hour chart instead of a 7 day chart.
	·		■ Low pressure chart with a start date of 4-8-2008 had
	,		a 24 hour chart instead of a 7 day chart.
		,	
	,	3.	Charts from 3-26-2008 thru 6-25-2008 were reviewed. At the following location the
			chart pen operated less than five days.
			At the Warner District Regulator Station
			 High pressure chart with a start date of 4-30-2008
•	,		At the Auburn Academy
			Five Low pressure charts with a start date of 5-21-
		1	2008, 5-7-2008, 4-30-2008, 4-23-2008 and 4-
			8-2008
			At Fairway Hill
		'	Low pressure chart with a start date 4-23-2008
			- Low pressure chart with a start date 4-25-2008
	l	<u> </u>	

S-Satisfactory U-Unsatisfactory N/A-Not Applicable N/C-Not Checked If an item is marked U, N/A, or N/C, an explanation must be included in this report.

	192.709	Valve Maintenance – Transmission (1 per yr/15 months) .745				
	start	No transmission			х	
	192.709	Valve Maintenance – Distribution (1 per yr/15 months) .747				
	Start THURS	Check every valve every year. Total # of valves approx 369 and have 22 EOP valves.				
		They partial turn, checks for leaks and accessible. Reviewed EOP valve 76, 56, 54, 46,	х			
		10, 107, 125, 148, 226, 78, 136, 129, 130, 136, 135, 138, 96, 88, 143, 144, 145, 141, 119, 149 and 137				
	480-93-100(3)	Service valve maintenance (1 per yr/15 months) (eff. 06/02/05)			T	
		All valves turned but did not know which ones were HOS valves. They have list of all				
		valves. Need to go thru and pull out or identify 480-93-100(2) valves.		x		
l `					Ì	
		SEE PV 1. HAVE NOT IDENTIFIED HOS SERVICE VALVES BUT DO TURN ALL VALVES				
	480-93-100(4)	Service valve installation and maintenance program fully implemented by 6/01/07?	х			
	192.709	Vault maintenance (≥200 cubic feet)(1 per yr/15 months) .749 No vaults over 200 feet			х	
	192. 603(b)	Prevention of Accidental Ignition (hot work permits) .751	х			
	192. 603(b)	Welding – Procedure 192.225(b)	х			
	192. 603(b)	Welding – Welder Qualification 192.227/.229	х			
	192. 603(b)	NDT – NDT Personnel Qualification .243(b)(2)	х			
	192.709	NDT Records (pipeline life) .243(f)	х			
	192.709	Repair: pipe (pipeline life); Other than pipe (5 years)	х			

Documentation Reviewed:			
Document Title	Document Number	Revision Date	Date Range Reviewed
			•

Comments: Q119. Correctly replace with pe, or direct bury, 2. Bond over or 3. Remove dresser. They replace but no time frame. Since 1995 eliminate 330 by one of the above methods

Ouestion 87

High Occupancy Structures leak surveys 93-188

- Enumclaw Adventist on HWY 164th,, OK
- Sacred Heart Catholic Church Farrelly St and Griffin Ave OK
- Enumclaw medical ctr OK
- Kingdom Hall Jehovah witness at 24009 236th OK
- Is Fairgrounds HOS OK
- Kings Motel HOS OK
- Church of Nazethrine, no screen on vent at back intersection of Warner and Charwila Lane OK
- Thunder Mt Middle School ok
- AT 2229 JENSEN LIVING COURT ASSISTED LIVING OK

S-Satisfactory U-Unsatisfactory N/A-Not Applicable N/C-Not Checked If an item is marked U, N/A, or N/C, an explanation must be included in this report.

Buss Dist

Texaco Corner, restaurant, gas sttion etc

Q119.

HOS are called business districts in Enumclaw and done at the same time

Reviewed Downtown Business District survey for 2007 completed on 10-12, 10-11, 10-10, 10-8, 9-19,-FI not calibrated on 9-19 10-1, 10-1, 10-2,10-3, and 10-4, 2007 AND individual areas are 2002 456 Way Greenhouse, Enumclaw Sale Pavilion 10-1-07, Academy Greenhouse, (schools have own leak survey), Meat market 10-1-07, Academy Industrial area 10-1, Browns corner 10-1, Muckleshoot wellness center 10-3-, Rainer bakery 10-3, Muckleshoot trade school10-3, and 21207 and 21416 SE 436th 10-1 NOTE they fill out one leak sheet it is called the Surface Sampling Program, it does not show all leak equipment used —

Reviewed Downtown Business District survey for 2006, completed 9-21, 9-29, 10-13, not 10-13 there is a 10-14,10-18, 10-26, 10-26, 10-20, 10-25,says 10-25 start of new week Dececto pak calibrated once a week 2006, 10-26, 10-26, 10-26, 10-26, 10-26, 10-26, 10-26, 10-26, 10-26, 10-26, and 10-13 AND Sale Barn 10-26-06, Muckleshoot Wellness center 10-26-06, 21416 SE 436th 10-26-06, Meat marker 10-26-06, Academy Industrial Area 10-26-06, Academy Greenhouses 10-26-06, Rainer Baker 10-26-06, Browns corner 10-26-06, Muckleshoot school/buss 10-26-06 and 20002 456 way 10-13-05 NOT 06 if really 05 appears they wrote wrong year—ok. NO PV written on above—vast majority ok

In 2006 found 4 leaks in buss dist survey located at 246 Semanski, 2993 Griffin, 1301 Cole and 428 Roosevelt. Reviewed 2006 calibration

High Pressure Survey

2007 done on 7-12-07, 7-17-07, 7-17-07 —reviewed calibration ok - doesn't show long side farm taps walked – 3 leaks found on farm taps at 45423 244th, 37408 Auburn Enumelaw Rd and 8825 Auburn Way S

2006 done on 6-23-06, 6-26-06, 6-26-06, 6-29-06 and 6-29-06 reviewed calibration - doesn't show long side farm taps walked - No leaks found in 2006

5 Year Surveys

Reviewed 2007 5 year survey. On map G1 a portion of main installed in 2004 was not mapped but it was leak surveyed. SEE PV

School Leak Survey

Reviewed for 2007 all ok-

Called unprotected leak Survey only isolated services no isolated mains do leak surveys twice a year. There are 140 Isolated Service in the system. Reviewed in 2007 on 4-24-07 and 10-15-07 The one I found (Cole St) was not on isolated list. 1994 Enumclaw did a complete survey and found 460 isolated services. In 1995 they agreed to replace all of them by 12-1-2995. Enumclaw DID NOT keep agreement.

	CORROSION CONTROL RECORDS	S	Ü	N/A	N/C
192.455(a)(1)	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71)	х			
192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71) 1978 did study to find all isolated facilities and installed cp on the system	х		٠	
	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years) Reviewed External Control Monitoring and Isolated structures and Steel services with anodes They have isolated mains protected with anodes 3000 feet located at 1078 Mt. Villa Drive and also on the Boise Creek bridge steel and pe on either side. Anodes not mapped on a list Enumclaw has 140 isolated facilities. To the best of their knowledge they have all of them, even thought I found one in alley off Cole street.	x	,		

	CORROSION CONTROL RECORDS	S	U	N/A	Ñ/C
192.465(a)	140 Isolated services have no cp -NO ANNODEs, this is not on map. Enumclaw does not have any Cathodic protection on 140 isolated services. They do 2 leak surveys a year and say are replacing as they can but have no written or other plan. 7-29-2008 note Enumclaw had always said they replace the isolated services. When I was reviewing the 2004 Atmospheric Corrosion Record I notice p/s reads. Ed explained that some of them are reads from the services they bonded instead of replaced. Enumclaw does not have records of where the bonded services are at. Enumclaw does not have a 10 year program everything is done annually No Electrical survey – SEE PV 6		х		

		CORROSION CONTROL RECORDS		S	U	N/A	N/C
		PV 6. CFR 192,465 (e) External corrosion control: Monitoring					
·		After the initial evaluation required by \$\$192.455(b) and (c) each operator must, not less than every 3 years at intervals to months, reevaluate its unprotected pipelines and catholically accordance with this subpart in areas in which active corros operator must determine the areas of active corrosion by ele However, on distribution lines and where an electrical surve on transmission lines, areas of active corrosion may be detei means that include review and analysis of leak repair and in corrosion monitoring records, exposed pipe inspection recon pipeline environment.	not exceeding 39 protect them in ion is found. The ctrical survey y is impractical mined by other spection records,				
		Enumclaw has previously been notified in Dockets 930 951343 of probable violations regarding unprotected ser UG-951343, Enumclaw failed to replace all remaining t services as agreed upon and documented in the 10-23-19 letter.	vices. In docket inprotected steel				
•		Finding a:					
		Enumclaw has not conducted and documented electrical surv	veys to determine		}		
		if there are areas of active corrosion. Also, Enumelaw's Unprotected I	eak Survey listed				
		133 of the actual 141 unprotected services. Following are the 141 unpr	otected services.				
		1. 235 Roosevelt		į			
		2. 2099 Second					
		3. 501 Griffin			·	1	1
		4. 825 Dickson					
		5. 1079 McKinley			l		
	· ·	6. 760 Charwila					
		7. 734 Charwila			1		
		8. 722 Charwila					
		9. 710 Charwila				l	
		10. 1058 Pioneer					
		11. 2245 Lincoln					1
		12. 1204 Pioneer					
		13. 1205 Harding		ŀ			
		14. 1251 Harding					
		15. 1221 Pioneer					
		16. 1619 Griffin	•				
		17. 1627 Griffin		ŀ			
		18. 1635 Griffin					
		19. 1504 Lafromboise					
		20. 1472 Lafromboise					
		21. 1444 Division					1
		22. 1526 Division					
		23. 1531 Lafromboise					
		24. 1540 Division					
		25. 1319 Lafromboise				1	1

		COR	OSION CON	TROL RECOR	DS			S	U	N/A	N/C
		20								,	
1		2									
		2:									
	·	25		_							
		30		fromboise		٠.,				İ	
i		3		fromboise]		
	•	32		fromboise							
		3:		fromboise			•				
	1	34		fromboise							
		3:		fromboise							
		30		fromboise (dog)							
		3'		fromboise					į	1	
1		38									l
		39		fromboise					ı		
		40		rding		•			1		
		4	2228 Lo	well Place							
		42	3129 Ha	rding							
		4:	3133 Ha	rding							
		44	3223 Ha	rding							
		4:	2046 Ma	Hugh							
		4	. 3252 Di	vision] .	
		4									
		48		-				1	x	l	
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	•	50						ŀ			
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l .		52		drickson							
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		60									
		61		drickson							
		62		drickson				·			
		63			•						
		64					••				
		65									
		66		Division		•					
		67				•					
		68									
		69									
		70									
i .			1323 Jet	ici soli							

	CORROSION CONTROL RECORDS	. S	U	N/A	N/O
	71. 2110 Wells				
	72. 2010 Wells				1
	73. 2107 Wells	ľ			1
·	74. 2118 Cole				
	75. 1313 Washington				
	76. 1902 Porter				
	77. 1902 Porter this is on Enumclaw's list twice so I listed it twice (maybe				
	house and garage/shop)				
	78. 2051 Fell				
	79. 2150 Porter		-		1
	80. 2240 Alpine Place				l
	81. 2251 Alpine Place	1			
	82. 2271 Alpine Place			8	
	83. 2305 Alpine Place				
	84. 2323 Alpine Place	1			
	85. 1730 Hillcrest			l	
	86. 1131 Battersby			İ	
	87. 2034 Fell				
	88. 1703 Washington				
	89. 1705 Marshall				
	90. 2030 Park			1	
	91. 2048 Park				
	92. 2037 James				
	93. 1807 Marshall				
	94. 1835 Marshall				
	95. 1635 Myrtle				
	96. 1622 Myrtle				
	97. 1806 Franklin	1			
·	98. 1615 Washington				
	99. 1605 Washington				
	100. 1725 Porter				
	101. 1708 Cole				
	102. 1712 Cole				
	103. 1732 Cole	ł			
	104. 1450 Cole	ł	į.	1	
	105. 117 Semanski				
	106. 119 Semanski				
	107. 121 Semanski	ŀ			
	108. 123 Semanski				
	109. 2464 Kibler				
	110. 1323 Farrelly				

		CORROSION CONTROL RECORDS	S	Ū	N/A	N/C
		111. 1441 Farrelly				
		112. 1567 Farrelly	1	ļ		
		113. 2966 Griffin		1		
		114. 2970 Griffin				
ľ		115. 2715 Griffin				
		116. 42626 248 th Ave SE				
		117. 43321 248 th Ave SE				
		118. 5701 37 th St SE				
		119. 3436 Academy Drive			ŀ	
		120. 5306 33 rd St		1		
	,	121. 5310 32 nd Street SE				
		122. 5330 32 nd Street SE				
•	•	123. 24608 SE 448 th ST				
		124. 37658 Auburn Enumelaw Rd				
		125. 23324 SE 436 th St \				
		125. 23324 SE 430 St \ 126. 44823 228 th Ave SE				
	4	· · · · · · · · · · · · · · · · · · ·	1	l .		
l						
		130. 23822 SE 472 nd St				
		131. 23407 SE 436 th Street				
		132. 43425 248 th Ave SE				
	,	133. 4345 248 th Ave SE				
	*	134. 235 Griffin,				
		135. 1611 2 nd Street,	1			
		136. 3238 Academy Dr, 137. 3818 Division,				
		137. 3818 Division, 138. 1178 Harding,				
	İ	139. 1728 Wells,				
		140. 1857 Lafromboise,				
		141. 1606 Myrtle				
		Maps or Records .491(a)				
	,	Steel services with anodes do not have anodes mapped only on list. 192.491(a)				
		Anode beds, individual anodes not mapped. They have list of anode records				
		(anodes at 3 bride crossings).				
		140 Toolstad sampless have no on this is not on man and record for anodes on a				
	192.491	140 Isolated services have no cp, this is not on map and record for anodes on a separate list. No anodes on unprotected services. Enumclaw does not have any				
	172.471	Cathodic protection on 140 isolated services. They do 2 leak surveys a year and	x			
		say are replacing as they can but have no written or other plan. SEE PV				
		Reviewed map of steel services with Cathodic protection				
		Reviewed Unprotected Leak Survey list.	ŀ			
L	1 .: .	No foreign isolation issues				

	CORROSION CONTROL RECORDS	S	Ü	N/A	N/C
	PV 9. CFR 192.491 (a) Corrosion control records Each operator shall maintain records or maps to show the location of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system				
	Enumclaw has previously been notified in Dockets 930308 and 940908 of probable violations regarding unprotected services.				
	Finding a: Enumclaw did not have and did not provide documentation that remedial action was completed within ninety days in the alley between Cole and Initial addressed at either 1522 or 1518 Cole. During the pre field inspection, on 2-19-2008, staff found and reported to Enumclaw a low pipe to soil read. Enumclaw inspected, found corrosion and replaced the service on 4-23-2008 (Staff conducted a crew inspection). Other that a phone message note from the day staff reported the low pipe to soil read. Enumclaw did not document this corrosion issue or ninety day remediation.		х		
	Enumclaw did not provide or did not have sufficient documentation of the locations of insulated fittings.				
	Examination of Buried Pipe when exposed .459 and 480-93-110 (6) Operators must record the condition of all underground metallic facilities each time the facilities are exposed. Reviewed Steel pipe inspection report. When wrap is damaged Enumclaw has not reported it as damage on damage report.				-
192.491	The steel pipe inspection report does not describe why Enumclaw was there. Form does not tie back to any work report. All in Marks head	x			
	No job cross reference number on steel pipe inspection report Enumclaw is thinking of adding another line to form that says remedial action and file in damage prevention. If so will need to be added to O&M				
	Have a remedial action form but are not currently using it – they say they will CP test reading on all exposed facilities where coating has been removed 8) On all cathodically protected pipelines, the operator must take a cathodic protection test reading each time an employee or representative of the operator exposes the facility and the protective coating is removed.				
480-93-110(8)	PV19. WAC 480-93-110(8) Corrosion control On all cathodically protected pipelines, the gas pipeline company must take a cathodic protection test reading each time an employee or representative of the gas pipeline company exposes the facility and the protective coating is removed.	x		,	
	Finding Enumclaw did not take cathodic protection test reading at the following locations: 1. at 38606 Auburn Enumclaw, on 9-7-2007. 2. at 3038 Gossard, on 5-27-2007.			:	

	CORROSION CONTROL RECORDS	S	U	N/A	N/C
192.491	Annual Pipe-to-soil monitoring (1 per yr/15 months) .465(a) Reviewed External Control Monitoring and Isolated structures and Steel services with anodes	х			
192.491	Rectifier Monitoring (6 per yr/2½ months) .465(b) Reviewed Rectifier Inspection Report Have 4 rectifiers 1. Meat market 2. McHugh Pump station 3. 24440 448 th 4. Auburn Academy	х			
192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c) 1. Resistance bond at Railroad and Marshall Reviewed Resistance Bond Monitoring Sheet	х			
192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c) Enumclaw does not have non critical interference bonds			х	
	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) Reviewed Corrosion control remedial action report I reported low cp read during pre field. Enumclaw went out and found corrosion on the riser At 1522 and 1518 Cole (manifold) and they replaced the corroded service, Reviewed cost sheet-utility service and no corrosion control remedial action report filled out There is a Remedial form in the new manual but they did not document remedial action before the new O&M so did not look for the form. Repaired on 4-23-08. I let Jim know of low reads on 2/19 and Mark looked same day. Although Enumclaw did not have documentation of dates I did. Did not use form, did not document dates, did not fill out service to replace service and didn't follow manual.				
480-93-110(2)	 What is you remedial action time for atmos corrosion Manual says remedial action for atmospheric corrosion is for minor rusting some pits is 12 months and for major wall loss is 90 days. 192.463 requires adequate cp, 2/19/08 I let Jim know that I found low cp in alley between Cole and Initial alley W? on both side of the door with Leo's Fashion above it on one side02 (native) it is a 6" riser with steel riser coming out of asphalt or concrete, tape coming off. Second is on other side of door it is09, steel riser in asphalt, ALSO vent inside alcove will vent to atmosphere but still inside alcove. 		х		
	Enumclaw should have know about unprotected service in ally because In 1995 they did complete cp audit of services. They did not find the one in the alley making us assume there are others they did not find in 1995. During inspection told me they found 450 services in 1995, in follow up office work found letter that said they had 341 unprotected services. In 95 they were given 10 years to replace the unprotected services and had to do 2 leak surveys a year until complete. It is 2008, 141 have not been replaced or repaired. They verbally say 141 services, their list had 133, they knew about the 8 others that were not on list.				

	CORROSION CONTROL RECORDS	S	Ū	N/A	N/C
	PV 7. WAC 480-93-110 (2) Corrosion control				
	2) Each gas pipeline company must complete remedial action within ninety days to correct any cathodic protection deficiencies known and indicated by any test, survey, or inspection. An additional thirty days may be allowed for remedial action if due to circumstances beyond the gas pipeline company's control the company cannot complete remedial action within ninety days. Each gas pipeline company must be able to provide documentation to the commission indicating that remedial action was started in a timely manner and that all efforts were made to complete remedial action within ninety days. (Examples of circumstances allowing each gas pipeline company to exceed the ninety-day time frame include right of way permitting issues, availability of repair materials, or unusually long investigation or repair requirements).				
	Enumclaw has previously been notified in Dockets 930308, 951343 and 040525 of probable violations regarding Remedial Action.				
	Finding a: Enumclaw did not complete remedial action on approximately 350 unprotected services as they committed to in docket UG-951343. Enumclaw failed to replace all remaining unprotected steel services as agreed upon and documented in the 10-23-1996 audit closing letter.				
	Finding b: Repairs were not made within ninety days after the 2007 atmospheric corrosion inspection noted grade 3 conditions (require immediate repair). Enumclaw did not complete remedial action within ninety days at the following locations: a. 27113 SE 432th Street, found 9-5-2007 and remedial actions was conducted on 8-11-2008, when the steel riser was replaced with an anode less riser. b. 26815 SE 432th Street, found 9-5-2007 and remedial action was conducted on 8-6-2008, when the steel riser was replaced with an anode less riser.				
	Finding c: Enumclaw did not have and did not provide documentation that in the alley between Cole and Initial, addressed as either 1522 or 1518 Cole was a corrosion issue and did not have a ninety day remediation date. During the pre field inspection, on 2-19-2008, staff found and reported to Enumclaw a low pipe-to-soil read. Enumclaw inspected, found corrosion and replaced the service on 4-23-2008 (Staff conducted a crew inspection). Other that a phone message note from the day staff reported the low pipe to soil read, Enumclaw did not document this as a corrosion issue, only a replaced service. Enumclaw did not document this corrosion issue or ninety day remediation.				
480-93-110(3)	CP equipment/ instrumentation maintained, tested for accuracy, calibrated, and operated in accordance with manufactures recommendations, or at appropriate schedule determined by gas company if no recommendation. Reviewed 4 LC4 volt meters no serial numbers and all calibrated by M C Miller on 12-5-06 and 10-10-06 and for 2007 is 9-14-07 and 1-3-08. O&M says once each calendar year not to exceed 15 months. Exceeded 3 days because hurricane - OK	x			

	CORROSION CONTROL RECORDS	S	U	N/A	N/C
	Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months) .465(e)				
192.491	each operator must, not less than every 3 years at intervals not exceeding 39 months, reevaluate its unprotected pipelines and cathodically protect them in accordance with this subpart in areas in which active corrosion is found.		x		
	Reviewed Unprotected Leak Survey Form (isolated services) Enumclaw does leak survey twice a year but does not cp or bond the lines SEE PV9				
192.491	Electrical Isolation (Including Casings) .467 none	х		,	
	Casings inspected/tested annually not to exceed fifteen months Reviewed Railroad and Highway Crossing. Enumclaw does 4 times a year during the Patrols				
	O&M says a difference between reads indicates that there is not a short. I asked about read difference. Paul did say Norton had written that part of the O&M. They asked what is acceptable and I explained that .7 is a good number. Enumclaw does not use these criteria to determine shorted casings. Enumclaw has a tinker razor and use it when there is a possible short.				
	Manual says when potential on pipe and casing are approximately the same; it indicates there may be a short. This was established by Norton corrosion. Probable violation 3			-	
480-93-110(5)	PV3. WAC 480-93-110 (5) Corrosion control Each gas pipeline company must conduct inspections or tests for electrical isolation between metallic pipeline casings and metallic pipelines at least once annually, but not to exceed fifteen months between inspections or tests. The test or inspection must also determine whether the pipeline has adequate levels of cathodic protection at the casing to pipeline interface.		х		
	Enumclaw has previously been notified in dockets in Dockets 930308, 940908, 951343 and 000955 of probable violations regarding casings. Finding a: Following are casing that Enumclaw does not have/or did not provide records for and is not inspecting. 1. 6" HP main a. Map A-15-N, at the intersection of Auburn Enumclaw Highway and 180 Ave SE b. MAP B-13-N, near 42703 Auburn Enumclaw Rd c. Map C-8-S, Enumclaw Auburn Road and 228th Ave SE. The casing that is not tested annually				
	 d. Map C-11-N, at SR 164 and 208th Ave SE, near State Permit No 1951. e. B-14-N, casing crosses SR164 at 188th Ave SE near State Permit No. 2871 note. The casing that is not tested annually. 				

	(CORROSI	N CONTROL RECORDS	S	U	N/A	N/C
		2.	4" mains				
			1. Map C-8-S, casing to 23112 Enumclaw Auburn Rd		1		
			 Map C-8-S, casing to 23208 Enumelaw Auburn Rd]	
			4. Map C-8-S, casing to 23324 Enumclaw Auburn Rd				
,			e. Map E-3-S, on Warner at Blake				
			f. Map E-3-S, on Warner crossing Blake		1		
	•	•					
		3.	2" steel mains				
			a. Map D-4-S, on Griffin, starting at Blake and ending on				
			Third Street				١.
,			b. Map E-4-N, on Blake at Roosevelt				l `
	•	<u>Finding</u>					
		Followi	g are service casings that Enumclaw does not have/or did not				
		provide	ecords for and is not inspecting.				
		1.	6" HP main				
		•	a. Map C-9-N, 22324 SE 436 th St or the Auburn Enumclaw		1	1	
			Rd, map is unclear.				
			b. Map C-9-N, 22004 Auburn Enumclaw Rd		1	1	l ·
			c. Map C-10-N, three without addresses on Auburn		1	1	
			Enumelaw Road				
ľ			d. Map C-12-N, a farm tap turned dist regulator without				
			addresses on Auburn Enumelaw Road across the street				
			from a residence with a note: State Permit 2299.				
•			e. Map B-13-S, 42906 SR 164				
			f. Map B-13-N, no address near Auburn Enumclaw Rd and				
	· ·		188 th Ave SE with a note: State permit 2871				
		•	16 W116 G 20024 1 1 D 1 D 1				
	•		g. Map W-16-S, 38924 Auburn Enumciaw Rd h. Map W-16-N, service without address but with note:				
			State permit 3115]		
	•		i. Map V-18-S, 37676 SR 164				
			j. Map U-18-S, 37326 Auburn Enumclaw Rd	1			
			J. Map 0-16-5, 37526 Aubum Emunciaw Ru	1		ŀ	
		2.	2" steel mains			ŀ	
1		La .	and the same of th	1.		ļ	
			 a. Map C-8-N, no address, it is N of 43422 228" Ave SE b. Map A-4-S, ¾" service at 42102 264th Ave SE 			l	
			in a first transfer of the company o	1		l	
			 d. Map A-4-S. 1" service at 42410 264" Ave SE d. Map B-4-S, ¾" service at 42926 264th Ave SE 	1		l	
·				1			
			e. Map B-4-S, 1" service at 3415 Porter	1		!	
			f. Map B-4-S, 3" service at 3369 Porter				
			g. Map B-4-S, 1" service at 3327 Porter	1			
		3.	4" steel mains			'	
		3.	n a man a a man a a man a a th a	.[l	
	· ·		and the second s	1			
	į į					l	•
			d. Map D-7-N, 24216 SE 440 th St	[
			e. Map D-7-N, 43909 241 st Place				
			f. Map E-2-N, no address with note: State permit 2289				
	*En	umclaw re	ts satellite interrupter so that all rectifiers interrupt at the				
-			they get reads. They use the instant off	l x			
				1 ^		1	
1	*En	umclaw ha	adequate test sites		<u> </u>		<u></u>

-		CORROSION CONTROL RECORDS	S	U	N/A	N/C
	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods	х			
	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days No shorted casings.	х			
	480-93-110(5)(c)	Casing shorts cleared when practical Yes, if they have any	х			
	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months Would be if had any	х			
	192.491	Interference Currents .473 none	х			
	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a) Reviewed Steel Pipe inspection report	. x			
	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b) Reviewed Steel Pipe inspection report	х			
	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477 none	х			

	• -	CORROSION CONTROL RECORDS	°S	U	N/A	N/C
	·	Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481 Reviewed the Atmospheric Corrosion Control form for 2007 PV - No procedure for Can't get in situations (no access) in the O&M and not followed see below. Atmosphere corrosion Control form had 2 addresses that could not be read because of a dog and rose bush. No attempt was made to go back.				
	·	Probable violation 4 PV4. CFR 192.481(a) Atmospheric corrosion control: Monitoring Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows: At least once every 3 calendar years, but with intervals not exceeding 39 months				
		Enumclaw has previously been notified in Dockets 930308, 951343, 971569 and 040525 of probable violations regarding Atmospheric Corrosion.				
		Finding a: All of the services inspected in 2007 were not inspected in the previous 36 to 39 months. All the services inspected in 2006 were not inspected in the previous 36 to 39 month period. To ensure pipeline safety, it is expected that operators establish atmospheric corrosion processes that meet the code.				
		Finding b The following locations on the 2007 Atmospheric Corrosion Control Inspection Form were scheduled to be inspection in 2007. They were not inspected in 2007 1. 1436 Porter St				
·	192.491	 1449 Marion St 1452 Porter St 		×		
		 4. 1981 Lafromboise St 5. 3312 Porter St 6. 1455 Marion St 				
		7. 203 Jewell St 8. 201 Jewell St 9. 125 Jewell St 10. 123 Jewell St				
		11. 121 Jewell St 12. 119 Jewell St 13. 122 Jewell St 14. 124 Jewell St				
		15. 126 Jewell St 16. 128 Jewell St 17. 200 Jewell St				
		18. 202 Jewell St 19. 204 Jewell St 20. 1134 Cole St 21. 1030 Division St				
		22. 2009 Roosevelt Ave 23. 2017 Roosevelt Ave 24. 2029 Roosevelt Ave				
	·	25. 2037 Roosevelt Ave				

	CORROSION CONTROL RECORDS	S	U	N/A	N/C
 	26. 2037 Roosevelt Ave				
	27. 2054 Roosevelt Ave				
	28. 2040 Roosevelt Ave				
	29. 2030 Roosevelt Ave				
	30. 2020 Roosevelt Ave				
	31. 1039 ½ Cole St				
	32. 1039 Cole St #3				
,	33. 1049 Cole				
	34. 1105 Cole			i	
	35. 1301 Cole St				
	36. 1308 Railroad St				
	37. 1407 Porter St				
	38. 1349 Porter St		·		
	39. 45026 228 th Ave SE				
	On Atmospheric Corrosion Control form condition 1 or 2 is noted. Condition 2 should have note of condition and what should be done. About 1/5 th of form not filled out properly.			,	·
	Reviewed 2007 atmospheric corrosion inspection of the farm taps that are now only transporting IP gas On form called Atmospheric corrosion and Cathodic protection survey (an old form) and new form has same name. Atmos corr inspection of farm taps is done during the leak survey. The farm taps that are no longer HP and just transporting gas need to be inspected in 3 years				
 192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485 Coating Enumclaw gives themselves 12 months and pitting gives themselves 90 days	х			÷
480-93-110(3)	CP Test Equipment and Instruments checked for accuracy/intervals (Mfct Rec or Opr Sched)	х			
480-93-110(3)	CP Test Equipment and Instruments checked for accuracy/intervals (Mfct Rec or Opr Sched)	х			

cumentation Reviewed:									
Document Title	Document Number	cument Number Revision Date Date							
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S - Satisfactory U - Unsatisfactory N/A - Not Applicable N/C - Not Checked If an item is marked U, N/A, or N/C, an explanation must be included in this report.

Comments:

- 192.491 note
- Make sure at Mountain Meadows Mobile Home Park at 456th and Birch that the 2 meters on Grandfir were inspected OK
- Map U18N make sure HP farm tap stubs above ground that they were inspected for atmospheric if not still HP annual OK
- Map U19N 2 farm tap stubs is farm tap there or cust below ground. If not cut need atmos inspection or dist reg inspection OK
- Map W16S is farm tap stub is cut below ground? Or is there atmos inspection OK
- Reg station at 224th SE and 448th SE, in building atmospheric FIELD ok
- COLE AND KIBLER AT CORNERSTONE BIBLE CHURCH BY DOOR WI CROSS ON IT ARE 2 SETS OF 3 METER MANIFOLD
 NO CORROSION BUT MOSS GROWING ON METERS NEEDS SCRAPPED AND PAINTED. WHEN LAST ATMOS CHECK new
 service installed is due for inspection this year could not find last atmos corr inspection ok

NEXT DOOR AT PARROTT'S FABRICATING PE SERICE WITH BUSH STARTING TO GROW AROUND IT LAST ATMOS CHECK - CHECK - new service is due for inspection this year could not find last atmos corr inspection ok

From Q129 Casings - ALSO see list of all casings For all reviewed Crossing Form

- a. Casing at end of bridge coming from Buckley OK
- b. SE 456th Warner and Hwy 410 3 casisng Field ok
- c. Casing on map T 19S' one at 5605 Auburn Way S, one at 150" not of 5720 Auburn Way SOK
- d. Casing on map W 16 S reg station Auburn Enumclaw gate OK
- e. Casing on map A 14 N NO VENT, CASING NOT KNOWN
- f. Casing on map C 13 N Auburn Enumelaw Rd and 196th Ok
- g. 456th and 244th SE casing OK
- h. Casing both sides of 228th Ave SE and SE 436th ST, at Texaco OK
- i. Casing at Texaco Corne at 228th Ave SE and SE 436th St when installed etc. test leads??? Yes

192.467 AND wac 480-93-115 CLEARING SHORTS

Cp READS TAKEN IN THE FIELD DURING PRE FIELD

- Branding iron café, at 228th Ave SE and SE 436th ST, -1.288
- Farm tap at Kind Feed Elenbaas -1.41
- Dauntless motors SE 436th, -1.468
- Other Dauntless motor meter -1.51
- Shop across from dauntless -1.501
- Sacred Heart Catholic church Farrelly St and Griffin -1.027
- Dr. Molen 1771 Farreley, -1.55
- Sojo Foods, Battersby Ave and Garrett, -1.182 Steel service in asphalt
- Cole and Garnett alley East? Meter N106028 -1.00 low compared to others in area
- Cole and Grnett alley East down alley by Leo's Fashions -.02 NO READ, notified Jim what is condition
- Other side of Leos Fashion is -.09 told Jim vent in alcove
- Cole and Initial alley E? first 3 meter maniold 6' off ground -1.00 low for area
- Net set of 3 meter manifold is -1.01
- Next meter -1.14
- 45203 244th Ave SE -1.50

NO screen in vent

• Down alley from Steak and Brew, Cole and Initial alley W is 3 meter manifold - 0.91 read low for area, no screen on vent and vented in alcove

	PIPELINE INSPECTION (Field)	S	³U	N/A	N/C
192.161	Supports and anchors (c) Each support or anchor on an exposed pipeline must be made of durable, noncombustible material Desantos Green House located at 20002 452th Way there is a wood block and concrete block supporting the meter. No PV written only one found, Enumclaw informed	x	-		_
480-93-080(1)(d)	Welding procedures located on site where welding is performed?	х			
480-93-080(1)(b)	Use of testing equipment to record and document essential variables	х			
480-93-080(2)(a)	Plastic procedures located on site where welding is performed?	x			
480-93-080(3)	Identification and qualification cards/certificates w/name of welder/joiner, their qualifications, date of qualification and operator whose qualification procedures were followed.	x			
480-93-013	Personnel performing "New Construction" covered tasks OQ qualified?	х			
480-93-015(1)	Odorization Adequate test stations	х			·
480-93-018(3)	Updated records, inc maps and drawings made available to appropriate operations personnel? See PV. Have updated map with print date as revision date	x			
192.179	Valve Protection from Tampering or Damage	х .			
 192.455	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71)	х			
192.463	Levels of cathodic protection	х			
192.465	Rectifiers	х			
192.467	CP - Electrical Isolation	х			
192.479	Pipeline Components exposed to the atmosphere	х			
192.481	Atmospheric Corrosion: monitoring	. x			
 192.491	Test Stations – Sufficient Number .469	x			
480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992)	х			
480-93-115(2)	Mains or transmission lines installed in casings/conduit. Are casing ends sealed?	х			
 480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed?	х			
 192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted	х			
192.605	Knowledge of Operating Personnel	X,			
480-93-124	Pipeline markers installed	х			
480-93-124(4)	Markers reported missing or damaged replaced within 45 days?	х			
 192.707	Warning Signs	х.			
192.719	Pre-pressure Tested Pipe (Markings and Inventory)	х			
192.195	Overpressure protection designed and installed where required? Williams provides overpressure protection at gate?	х			
 192.739	Pressure Limiting and Regulating Devices (Mechanical)	х			
192.743	Pressure Limiting and Regulating Devices (Capacities)		х		
192.355	Customer meters and regulators. Protection from damage b) Service regulator vents and relief vents. Service regulator vents and relief vents must terminate outdoors, and the outdoor terminal must: (1) Be rain and insect resistant:	x			
	 (1) Be rain and insect resistant; (2) Be located at a place where gas from the vent can escape freely into the atmosphere and away from any opening into the building; and, (3) Be protected from damage caused by submergence in areas where flooding may 	٠.			

		PIPELINE INSPECTION (Field)	S	Ū	N/A	N/C
		occur.				
		 At the Church of Nazerine at Warner and Charvilla there is no screen in the regulator vent. Informed Enumclaw. In the alley between Railroad and Cole and Initial and Griffin is a three meter manifold with no screen in the regulator vent. Informed Enumclaw. No pv for 1 and 2 because they were the only ones I saw during pre-field meter at field house at Pete's Pool on old house is under deck. Regulator would vent under deck does not vent to atmosphere 				
		AOC 1 CFR 192.355 (b)(2) Customer meters and regulators: Protection from damage (b) Service regulator vents and relief vents. Service regulator vents and relief vents must terminate outdoors, and the outdoor terminal must: (2) Be located at a place where gas from the vent can escape freely into the atmosphere and away from any opening into the building; and, Finding Gas connot escape freely into the etmosphere at Petris Pearl least data.				
		Gas cannot escape freely into the atmosphere at Pete's Pool located at Enumclaw's field house. The meter is under the deck. 1.Heads UP: Alley at Cole and Marshall behind police building no barricades 2. repair prior to inspection - meter on one side of Leo's Fashion in alley West of Cole and Initial 3. Heads up for Enumclaw-Cole and Initial alley W behind and down Steak and Brew across alley is a vent in an alcove 4. Heads up for Enumclaw-farther down alley is 6 meter manifold in alcove with door way under about 6 feet under roof, regulator above 2 ft from door 5. Heads up for Enumclaw- Cole and Myrtle alley west, Railroad is the parallel street from Cole. Regulator is in alcove AND SCREEND INTAKE FROM BUILDING IS INCHES AWAY 6. Heads UP 192.355 (b)(2) Thunder Mt. Middle School. Meter in cage under breeze way. Will vent but not suppose to be in a closure				
	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated.	х			
	480-93-140	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices?	х			
·	480-93-178(2)	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs)				
	480-93-178(4)	Minimum Clearances from other utilities. For parallel lines a minimum of twelve inches. Where a minimum twelve inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards.	х			
	480-93-178(5)	Minimum Clearances from other utilities. For perpendicular lines a minimum of six inches of separation from the other utilities. Where a minimum six inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards	х			
	480-93-178(6)	Are there Temporary above ground PE pipe installations currently?				
	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage? None			х	
	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline? None			х	

	PIPELINE INSPECTION (Field)	S	U	N/A	N/C
192.745	Valve Maintenance (Transmission) No Transmission			х	
192.747	Valve Maintenance (Distribution)	х			

Facility Sites Visited:		
Facility Type	Facility ID Number	Location
	,	
	·	
·		
Comments:		
Comments.	•	

S - Satisfactory U - Unsatisfactory N/A - Not Applicable N/C - Not Checked If an item is marked U, N/A, or N/C, an explanation must be included in this report.

Pipeline Safety Advisory Bulletins:

OPS, PHMSA ADB-08-02 dated 3/04/2008 Notice to Owners and Operators of Gas Pipelines to Consider the Potential Failure Modes for Mechanical Couplings Used for Joining and Pressure Sealing Pipe Joints Due to variables related to age of couplings, specific procedures and installation practices, and conditions specific to certain regions of the country, it is difficult to cite common criteria affecting all failures that operators should address. To ensure compliance with 49 CFR Part 192, PHMSA advises operators of gas distribution pipelines using mechanical couplings to take the 7 measures outlined in this notice.

Have done during leak surveys and have nothing but class 1 fitting and training for inspecting and proper installation

OPS, PHMSA DB-06-03 dated 11/17/2006 Notice to Operators of Natural Gas and Hazardous Liquid Pipelines to Accurately Locate and Mark Underground Pipelines Before Excavation Activities Commence Near the Pipelines

Excavation damage continues to be one of the three leading causes of pipeline damage. PHMSA continues to find pipeline operators damaging regulated pipelines, production and gathering pipelines, and other utilities adjacent to where construction and maintenance is being performed. This damage jeopardizes the safety of excavators, pipeline employees, construction personnel, and others in the vicinity of the excavation. To guard the integrity of buried pipelines and prevent injury, death, and property and environmental damage, PHMSA advises pipeline operators to take the 15 damage prevention measures outlined in this notice.

Have provided training and verify locates and calibrate locators

OPS, PHMSA ADB-06-01 dated 1/17/06 Integrate Operator Qualification Regulations into Excavation Activities

Although excavation is not explicitly addressed in 49 CFR parts 192 and 195, excavation is considered a covered task under the pipeline operator qualifications regulations. These regulations require that pipeline operators and contractors be qualified to perform pipeline excavation activities. This advisory reminds operators to ensure all procedures and processes to perform excavation and backfilling are followed. Only qualified personnel must oversee all marking, trenching, and backfilling operations.

Training and conversation in shop and field training for had digging, depth, back fill (no rocks), proper support and compaction.

Attachment 1

Distribution Operator Compressor Station Inspection
Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

N/C - Not Checked

.605(b)	COMPRESSOR STATION PROCEDURES	S	Ū	N/A	N/Ĉ
	.605(b)(6) Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service		-	х	
	.605(b)(7) Starting, operating, and shutdown procedures for gas compressor units			х	
	.731 Inspection and testing procedures for remote control shutdowns and pressure relieving devices (1 per yr/15 months), prompt repair or replacement			х	
·	.735 (a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings			х	
	(b) Tank must be protected according to NFPA #30			х	
	.736 Compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless:			x	
	• 50% of the upright side areas are permanently open, or			х	
	It is an unattended field compressor station of 1000 hp or less			х	

umentation Reviewed:				
Document Title	Document/Section Number	Revision Date		

Comments:				
NO COMMPRE	SSOR STATION	IN THE CIT	Y OF ENU	UMCLAW

	S U _A N/A N/C	
1 .709	.731(a) Compressor Station Relief Devices (1 per yr/15 months)	X
1	.731(c) Compressor Station Emergency Shutdown (1 per yr/15 months)	X
1	.736(c) Compressor Stations – Detection and Alarms (Performance Test)	X

Document Title	Document Number	Revision Date	Date Range Reviewed
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Attachment 1

Distribution Operator Compressor Station Inspection
Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

N/C - Not Checked

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NO COMPRESSOR STATION IN THE CITY OF ENUMCLAW

			COMPRESSOR STATIONS INSPECTION (Field)	S	U	N/A	N/C
			(Note: Facilities may be "Grandfathered")			IVA	14/
- 1	.163	(c)	Main operating floor must have (at least) two (2) separate and unobstructed exits			X	
1	l i		Door latch must open from inside without a key			X.	
1	1		Doors must swing outward			х	
. 1		(d)	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit			х	
1	1		Each gate located within 200 ft of any compressor plant building must open outward			X	
1	1		When occupied, the door must be opened from the inside without a key			Х	
		(e)	Does the equipment and wiring within compressor stations conform to the National Electric Code, ANSI/NFPA 70?			х	
1	.165	(a)	If applicable, are there liquid separator(s) on the intake to the compressors?			Х	
1	-	(b)	Do the liquid separators have a manual means of removing liquids?			· X	
1			If slugs of liquid could be carried into the compressors, are there automatic dumps on the separators, Automatic compressor shutdown devices, or high liquid level alarms?			X	
1	.167	(a)	ESD system must:		1		
1			- Discharge blowdown gas to a safe location			Х	
. 1	.		- Block and blow down the gas in the station	<u> </u>		Х	
			- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers			х	
1			- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage			х	
1			ESD system must be operable from at least two locations, each of which is:				
1	•		- Outside the gas area of the station			X	
1	•		- Not more than 500 feet from the limits of the station			х	
. 1	1		- ESD switches near emergency exits?			Х	
		(b)	For stations supplying gas directly to distribution systems, is the ESD system configured so that the LDC will not be shut down if the ESD is activated?			х	
1	1	(c)	Are ESDs on platforms designed to actuate automatically by				
1	1		- For unattended compressor stations, when:				
1	1		The gas pressure equals MAOP plus 15%?			х	
1	1		An uncontrolled fire occurs on the platform?			х	
1	1		- For compressor station in a building, when				
1			An uncontrolled fire occurs in the building?			х	
1		•	 Gas in air reaches 50% or more of LEL in a building with a source of ignition (facility conforming to NEC Class 1, Group D is not a source of ignition)? 			х	1
1	.171	(a)	Does the compressor station have adequate fire protection facilities? If fire pumps are used, they must not be affected by the ESD system.			х	

Attachment 1

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N/C - Not Checked

		COMPRESSOR STATIONS INSPECTION (Field) (Note: Facilities may be "Grandfathered")	S	Ū	N/A	N/C
19	(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?			х	
20	(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?			х	
20	(d)	Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?			Х	
2	(e)	Are the mufflers equipped with vents to vent any trapped gas?			Х	
2	.173	Is each compressor station building adequately ventilated?			х	
20	.457	Is all buried piping cathodically protected?			X	
20	.481	Atmospheric corrosion of aboveground facilities			X	
20	.603	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?			х	
20		Are facility maps current/up-to-date?			X	
20	.615	Emergency Plan for the station on site?			X	
. 20	.619	Review pressure recording charts and/or SCADA			X	
2	.707	Markers			X	
2	.731	Overpressure protection – relief's or shutdowns			Х	
2	.735	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?			х	
2		Is aboveground oil or gasoline storage tanks protected in accordance with NFPA standard No. 30?			х	
2	.736	Gas detection – location			X	

Document Title	Document Number	Revision Date	Date Range Reviewed
		·	

Comments:		
NO COMPRESSOR STATIONS I	N THE CITY OF ENUMCLAW	