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DEPARTMENT OF PUBLIC WORKS
WUTC

June 19, 2006

WUTC
Alan E. Rathbun
Pipeline Safety Director
PO Box 47250
Olympia, WA 98504-7250

Dear Alan:

After receiving your letters of April 6, 2006 and May 17, 2006, regarding your final review of the *2006 Enumclaw Specialized Inspection*, the City Gas Utility revisited each issue you identified in your letters.

The City wants to resolve all concerns you may have with the Enumclaw Gas Utility. The following comments and proposals will address the issues you identified by either indicating your concerns are corrected, or the City understands the concern and is proposing a reasonable time frame to resolve the issue.

In response to your latest letter of May 17, 2006 regarding deficiencies in the City's Operations and Maintenance Manual, I agree the O & M Manual needs to be reviewed and updated to properly address each operational procedure, and to cross reference our Operator Qualification (OQ) Manuals and State and Federal regulations. In your April 6, 2006 letter, under item three of probable violations, it was also noted that the City of Enumclaw's operating procedures were not adequately detailed. As discussed with your staff recently, it is apparent we need to update our O & M Manual. The City of Enumclaw requests 18 months to develop this manual. Additional staff, or Consultants will be used to accomplish this task.

In reviewing your letter of April 6, 2006, which identified four probable violations and two areas of concern, the following comments and resolutions are submitted for your review.

1. 49 CFR 192.355 (b)(1) states service regulator vents and relief vents must terminate outdoors and the outdoor terminal must be rain and insect resistant. The city has modified all regulator vents listed in your letter to face downward and all vents screened to prevent insect entry. All remaining gas services have been visited to assure all vents meet this regulation. In-house discussions and training

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has been completed on this subject to assure all employees are aware of proper installation procedures and the City of Enumclaw's operation and maintenance manual reflect this requirement.

2. Regulation 49 CFR 192.195 relates to protection against accidental over-pressuring. The city of Enumclaw has installed fracture disk over-pressure protection devices with vents, and in a few cases, as listed in your letter, some vents were not facing downward. As of now all fracture disk over-pressure protection devices listed in your letter have been modified and all additional sites have been checked for proper vent installation. Additional in-house training has been completed to assure all employees are aware of proper installation of all venting, in accordance with manufacturer's instructions.
3. The third probable violation relates to the requirement of a procedural manual for operations, maintenance, and emergencies. As indicated earlier in this letter, the city concurs that our O & M Manual needs to be reviewed and updated in its entirety. Your first example of inadequate procedures related to the city not indicating what the Lower Explosive Level (LEL) is, for Enumclaw gas. That has been corrected, and our O&M manual does state LEL of 4% concentration of gas in air. Your second example related to our O&M Manual referencing 20% SMYS which doesn't apply to the City of Enumclaw's operation. The City only operates under 20% SMYS. The city's original O&M procedures only related to under 20% SMYS, however, when the city made corrections to the 33 operational procedures, as you requested, the 20% SMYS verbiage was accidentally inserted. The 20% SMYS relates to a more restrictive higher pressured systems, which would be more restrictive and probably not a safety issue, however, the procedure has been corrected and we appreciate your time and effort in reviewing those procedures we submitted.
4. Item four of your April 6, 2006 letter relates to a written qualification program. I believe your position was one of our employees attended a Local 32 class on relief regulators and passed the class exam, and because we left the exam and other correspondence in his OQ file we were basically saying he was qualified. I understand your position and that was incorrect for us to leave it in the OQ file. As stated in an earlier letter to you the employee is classified as a Gas Worker for the City of Enumclaw and his job description doesn't allow him to perform those duties, so there was no confusion for the city staff as to what work he was allowed to perform. I don't feel this was a direct safety issue because city policy, job description, and actual field training would not allow him to operate the relief regulator. However, I agree it would be incorrect to allow the qualification papers to remain in his OQ file. We allowed the employee to attend the class for training purposes. He needs to become more familiar with relief regulators and do field training before he could move into a technician status, and be responsible for relief regulators. In reference to addressing specific qualifications of Enumclaw's employees regarding equipment and procedures, Local 32 qualifies employees in

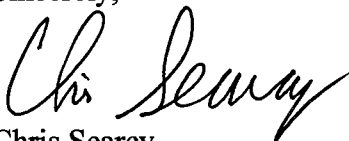
reference to their standards and procedures. The City issued a copy of our O&M Manual to Local 32 to adjust their training to meet our needs. If our specifications or equipment differs significantly from other companies taking the same training, our policy is to give additional training in-house at Enumclaw in addition to the Local 32 training program. Perhaps we need to discuss this issue in more detail with WUTC staff, to ensure the City of Enumclaw is following proper procedures. The City could require all progressive training, not associated with an employee's authorized duties to be filed separately, until the employee is qualified, and then the training documentation can be transferred to their OQ file.

The second concern in item four relates to recognizing abnormal operating conditions. The WUTC staff found a few vents on regulators installed horizontally verses pointing downward, as required. None of these installations were recent, however, due to location or other reasons, they were missed. The city of Enumclaw's employees check for abnormal operating conditions during their routine reviews on all sites. All problem areas identified have been corrected and we have field checked the remaining regulators throughout the system. Additionally, in-house training has been completed on proper installation of regulator venting. Meter readers have also been assigned to watch for any abnormal operating condition that are in their scope of training.

In addition to your four probable violations indicated above you referenced two areas of concern. The concern regarding implementation of recommended action in your Advisory Bulletin, has been addressed. The field adjustment of marking the positive and negative leads inside each rectifier has been completed and corresponding changes to the O&M manual are being completed. The second concern of an inadequate number of staff within the Natural Gas Utility has been noted and is under study. However, as indicated earlier in this letter, in reference to updating and revising the O&M Manual, the city will proceed with that project through consultant assistance or additional staff.

As stated above, the City wants to resolve all concerns you may have with the Enumclaw Gas Utility. The city has always worked closely with the WUTC staff in past years and would like to continue a good working relationship. I feel it is important we discuss the City's options in updating the Enumclaw's O&M Manual. The City will be available to meet with your staff at their convenience.

Sincerely,



Chris Searcy
Director Public Works

cc: Mark Bauer
Jim Flisrand
Mark VanWieringen