

Attachment 1

**Final 2008 Probable Violation Staff Report
for the City of Enumclaw
Docket PG-080097**

January 22, 2009

Utilities and Transportation Commission
Pipeline Safety Program

UTILITIES AND TRANSPORTATION COMMISSION
2008 Standard Inspection
City of Enumclaw Probable Violation Report
Docket PG-080097

1. **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 are 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.

Finding(s):

Enumclaw's Operations and Maintenance (O&M) Manual did 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.

1. Enumclaw's O&M Manual, Procedure 2-O, Section 5.3, did not include a procedure to gain access to conduct an atmospheric corrosion inspection at locations where access is unavailable during the initial inspection.
2. Enumclaw's O&M Manual, Procedure 2-D, Section 4.3, did not include a method, such as a list, to identify pre existing high occupancy structures.
3. Enumclaw's O&M Manual, Procedure 2.O, Section 5.5, did not accurately reflect the intent of the CFR 192.465(e) and determine the areas of active corrosion by electrical survey.
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 480-93-180 by a trained person.
5. Enumclaw's practice is to inspect every valve annually and this practice is not in the O&M Manual.

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:

In docket UG-960732, the City of Enumclaw was granted a waiver to operate its intermediate pipeline segments at a MAOP not to exceed 40 psig. "Farm Tap" style regulators are pressure relieving stations and installed on the city's high pressure pipeline system to prevent the overpressure of gas services fed by these regulators. Each Farm Tap has a rupture disc installed to prevent an overpressure condition. They should relieve at or below 46 psig (MAOP of 40 psig plus 6 psig). The rupture discs installed relieve between 54 and 57 psig. This exceeds the allowed pressure. The following is a list of farm taps that do not meet the requirement:

- | | |
|--|------------------------------------|
| 1. 45527 244 th Ave SE | 23. 42315 Auburn/Enumclaw Hwy |
| 2. 45423 244 24 th Ave SE | 24. 41801 180 th AVE SE |
| 3. 45317 244 th Ave SE | 25. 41527 Auburn/Enumclaw Hwy |
| 4. 45203 244 th Ave SE | 26. 40901 Auburn/Enumclaw Hwy |
| 5. 44807 244 th Ave SE | 27. 39819 Auburn/Enumclaw Hwy |
| 6. 22233 SE 436 th St. | 28. 39719 Auburn/Enumclaw Hwy |
| 7. 22109 SE 436 th St. | 29. 39606 Auburn/Enumclaw Hwy |
| 8. 22025 SE 436 th St. | 30. 39525 Auburn/Enumclaw Hwy |
| 9. 21928 SE 436 th St. | 31. 39409 Auburn/Enumclaw Hwy |
| 10. 21611 SE 436 th St. | 32. 39406 Auburn/Enumclaw Hwy |
| 11. 21416 SE 436 th St. | 33. 39307 Auburn/Enumclaw Hwy |
| 12. 21207 SE 436 th St. | 34. 38924 Auburn/Enumclaw Hwy |
| 13. 20911 SE 436 th St. | 35. 38819 Auburn/Enumclaw Hwy |
| 14. 43706 208 th Ave SE | 36. 38629 Auburn/Enumclaw Hwy |
| 15. 20613 SE 436 th St | 37. 38606 Auburn/Enumclaw Hwy |
| 16. 20104 SE 436 th St | 38. 38501 Auburn/Enumclaw Hwy |
| 17. 20101 SE 436 th St | 39. 38334 Auburn/Enumclaw Hwy |
| 18. 19120 SE 432 nd St | 40. 38325 Auburn/Enumclaw Hwy |
| 19. 42906 Auburn-Enumclaw Hwy | 41. 38117 Auburn/Enumclaw Hwy |
| 20. 188 th /Auburn-Enumclaw Hwy | 42. 37978 Auburn/Enumclaw Hwy |
| 21. 42705 Auburn/Enumclaw Hwy | 43. 37927 Auburn/Enumclaw Hwy |
| 22. 42316 Auburn/Enumclaw Hwy | 44. 37739 Auburn/Enumclaw Hwy |

- | | |
|---|-------------------------------|
| 45. 37676 Auburn/Enumclaw Hwy | 51. 36823 Auburn/Enumclaw Hwy |
| 46. 151 st / Auburn/Enumclaw Hwy | 52. 36809 Auburn/Enumclaw Hwy |
| 47. 37637 Auburn/Enumclaw Hwy | 53. 5825 Auburn Way S |
| 48. 37326 Auburn/Enumclaw Hwy | 54. 5709 Auburn Way S |
| 49. 37127 Auburn/Enumclaw Hwy | 55. 5636 Auburn Way S |
| 50. 37105 Auburn/Enumclaw Hwy | 56. 5605 Auburn Way S |

3. **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. . .

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

Finding a:

Enumclaw did not have/or did not provide inspection records for the following casings on natural gas mains:

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 Road
 - 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.

2. 4" mains
 - a. Map C-8-S, casing to 23112 Enumclaw Auburn Road
 - b. Map C-8-S, casing to 23208 Enumclaw Auburn Road
 - c. Map C-8-S, casing to 23306 Enumclaw Auburn Road
 - d. Map C-8-S, casing to 23324 Enumclaw Auburn Road
 - e. Map E-3-S, on Warner at Blake
 - f. Map E-3-S, on Warner crossing Blake

3. 2" mains

- a. Map D-4-S, on Griffin, starting at Blake and ending on Third St
- b. Map E-4-N, on Blake at Roosevelt

Finding b:

Enumclaw did not have/or did not provide inspection records for the following casings on natural gas services:

1. 6" HP main

- a. Map C-9-N, 22324 SE 436th St or the Auburn Enumclaw Road, map is unclear.
- b. Map C-9-N, 22004 Auburn Enumclaw Road
- c. Map C-10-N, three without addresses on Auburn Enumclaw Road
- d. Map C-12-N, a farm tap addresses on Auburn Enumclaw 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 Road and 188th Ave SE with a note: State permit 2871
- g. Map W-16-S, 38924 Auburn Enumclaw Road
- 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 Road

2. 2" mains

- a. Map C-8-N, no address, it is N of 43422 228th Ave SE
- b. Map A-4-S, 3/4" service at 42102 264th Ave SE
- c. Map A-4-S, 1" service at 42410 264th Ave SE
- d. Map B-4-S, 3/4" service at 42926 264th Ave SE
- e. Map B-4-S, 1" service at 3415 Porter
- f. Map B-4-S, 3/4" service at 3369 Porter
- g. Map B-4-S, 1" service at 3327 Porter

3. 4" mains

- a. Map D-7-N, 23718 SE 440th St
- b. Map D-7-N, 23924 SE 440th St
- c. Map D-7-N, 24018 SE 440th St
- d. Map D-7-N, 24216 SE 440th St
- e. Map D-7-N, 43909 241st Place
- f. Map E-2-N, no address with note: State permit 2289

4. **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:

In Enumclaw 2007 atmospheric corrosion inspection, 33 natural gas services were not inspected in the previous 36 to 39 months. The locations of the 33 services are:

1. 1436 Porter St.
2. 1449 Marion St.
3. 1452 Porter St.
4. 1981 Lafromboise St.
5. 1455 Marion St.
6. 203 Jewell St.
7. 201 Jewell St.
8. 125 Jewell St.
9. 123 Jewell St.
10. 121 Jewell St.
11. 122 Jewell St.
12. 119 Jewell St.
13. 124 Jewell St.
14. 126 Jewell St.
15. 128 Jewell St.
16. 200 Jewell St.
17. 202 Jewell St.
18. 204 Jewell St.
19. 1134 Cole St.
20. 1030 Division
21. 2009 Roosevelt Ave.
22. 2017 Roosevelt Ave.
23. 2037 Roosevelt Ave.
24. 2040 Roosevelt Ave.
25. 2030 Roosevelt Ave.
26. 1039 ½ Cole St.

27. 1039 Cole St. #3
28. 1049 Cole St.
29. 1105 Cole St.
30. 1301 Cole St.
31. 1308 Railroad
32. 1407 Porter St.
33. 1349 Porter St.

Finding b:

During the 2007 Atmospheric Corrosion Control Inspection, Enumclaw did not inspect the following 38 services scheduled to be inspected in 2007.

- | | |
|------------------------|------------------------------------|
| 1. 1436 Porter St | 20. 1134 Cole St |
| 2. 1449 Marion St | 21. 1030 Division St |
| 3. 1452 Porter St | 22. 2009 Roosevelt Ave |
| 4. 1981 Lafromboise St | 23. 2017 Roosevelt Ave |
| 5. 3312 Porter St | 24. 2029 Roosevelt Ave |
| 6. 1455 Marion St | 25. 2037 Roosevelt Ave |
| 7. 203 Jewell St | 26. 2054 Roosevelt Ave |
| 8. 201 Jewell St | 27. 2040 Roosevelt Ave |
| 9. 125 Jewell St | 28. 2030 Roosevelt Ave |
| 10. 123 Jewell St | 29. 2020 Roosevelt Ave |
| 11. 121 Jewell St | 30. 1039 ½ Cole St |
| 12. 119 Jewell St | 31. 1039 Cole St #3 |
| 13. 122 Jewell St | 32. 1049 Cole |
| 14. 124 Jewell St | 33. 1105 Cole |
| 15. 126 Jewell St | 34. 1301 Cole St |
| 16. 128 Jewell St | 35. 1308 Railroad St |
| 17. 200 Jewell St | 36. 1407 Porter St |
| 18. 202 Jewell St | 37. 1349 Porter St |
| 19. 204 Jewell St | 38. 45026 228 th Ave SE |

5. **CFR 192.13 (c) what general requirements apply to pipelines regulated under this part?**

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, 940908, 951343 and 000955 of probable violations regarding general requirements.

Finding a:

Enumclaw did not provide and document adequate technical procedural training in order to implement the new O&M Manual including policies and procedures to ensure pipeline safety of the system. Enumclaw's staff informed UTC staff that the training consisted of how to navigate the electronic version of the O&M Manual.

Finding b:

Enumclaw did not follow its plans, procedures and programs in the O&M Manual:

1. Procedure 4-E, Section 2.1 (d): This procedure requires maps to be updated within six months of the completion of a construction activity and made available to appropriate operating personnel. As an example, Enumclaw has different revision dates on the half section Map G1 and the quarter section Map G1. The map with the latest revision date is not as accurate as the map with the older revision date.
2. Procedure 4-P, Section 5.2 (c) (2): This procedure 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 at Pete's pool.
3. Procedure 2-O, Section 6.1 (d): This procedure requires remedial action and requires it to be completed within ninety days to correct any cathodic protection deficiencies known and indicated by any test, survey or inspection. Enumclaw did not complete or did not document remedial action. An example is between Cole St and Initial St addressed as either 1522 or 1518 Cole.
4. Procedure 4-E, Section 2.3.2: This procedure requires that measurements shall begin at the centerline or property line 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. An example is Main/Service Line Inspection Report dated 8-20-2007 and located at 415th and Auburn Enumclaw Road.
5. Procedure 2-P, Section 4.1 (d): This procedure requires that it is necessary to determine and document the perimeter of the leak area and check it with a combustible gas indicator (CGI). An example is found on the Leak Repair Report, for damage at Roosevelt at 104' west of the centerline of Forman.
6. Procedure 2-O, Section 6.4: This procedure requires remediation to be documented on Enumclaw form 2-O-3, Corrosion Control Remedial Action Report. Enumclaw did not consistently use this form.
7. Appendix 3-B-2 contains Enumclaw's Gas System Service Order form was not used. Enumclaw started using the form after the 2008 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. Enumclaw did not have an accurate count of third party damages incurred.
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. Enumclaw used maps that did not show all the facilities to be leak surveyed, making it impossible to color code the facilities leak surveyed. An example is the map Enumclaw used to conduct its 2007 High Pressure leak survey with.
10. Procedure 2-O, Section 5.3 (a): This procedure requires 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 the 2006 and 2007 atmospheric corrosion inspections, Enumclaw did not meet the 3 year not to exceed 39 month requirement.
11. Procedure 2-O, Section 5.3: This procedure establishes grading criteria to be used during atmospheric corrosion inspections. During the 2006 atmospheric corrosion inspection, grading that was not approved in Enumclaw's O&M Manual was used at least nine times.
12. Procedure 2-O, Section 5.3 (c): This procedure requires atmospheric corrosion condition 2s found during an atmospheric corrosion inspection to be remediated in 12 months. Enumclaw did not complete the 2006 atmospheric corrosion remediation for the 2006 atmospheric corrosion inspection in the required time frame at the following locations.
 1. 3429 McHugh Place: inspected 7-24-06, cleaned and coated 7-26-08.
 2. 3136 Academy Dr SE: inspected 7-24-06, cleaned and coated 7-26-07.
 3. 3133 Academy Dr SE: inspected 7-24-06, cleaned and coated 7-26-07.
 4. 3137 Academy Dr SE: inspected 7-24-06, cleaned and coated 7-26-07.
 5. 5302 33rd St SE and Academy Dr SE: inspected 7-24-06, cleaned and coated 7-26-07.
 6. 1940 Wilson: inspected 7-24-06, cleaned and coated 7-26-08.
 7. 3429 McHugh Place: inspected 7-24-06, cleaned and coated 7-26-08.
 8. 20625 SE 436th St: inspected 7-24-06, cleaned and coated 7-26-08.
 9. 24112 SE 440th St: inspected 7-24-06, cleaned and coated 7-26-08.
 10. 1856 Loraine St: inspected 7-24-06, cleaned and coated 7-26-08.
 11. 23123 SE 464th St: inspected 7-24-06, cleaned and coated 7-26-08.
 12. 1192 Harding St: inspected 7-31-06, cleaned and coated 8-8-08.
 13. 1185 Garfield St: inspected 7-31-06, cleaned and coated 8-8-08.
 14. 1121 Garfield St: inspected 7-31-06, cleaned and coated 8-8-08.
 15. 3245 Academy Dr SE: inspected 7-31-06, cleaned and coated 8-8-08.
 16. 3335 Academy Dr SE: inspected 7-31-06, cleaned and coated 8-8-08.
 17. 3339 Academy Dr SE: inspected 7-31-06, cleaned and coated 8-8-08.

18. 3443 Academy Dr SE: inspected 7-31-06, cleaned and coated 8-8-08.
19. 3525 Academy Dr SE: inspected 7-31-06, cleaned and coated 8-8-08.
20. 3607 Academy Dr SE: inspected 7-31-06, cleaned and coated 8-8-08.
21. 3611 Academy Dr SE: inspected 7-31-06, cleaned and coated 8-8-08.
22. 3617 Academy Dr SE: inspected 7-31-06, cleaned and coated 8-8-08.
23. 825 Myrtine St: inspected 8-2-06, cleaned and coated 8-7-08.
24. 755 Myrtine St: inspected 8-2-06, cleaned and coated 8-7-08.
25. 741 Myrtine St: inspected 8-2-06, cleaned and coated 8-7-08.
26. 706 Myrtine St: inspected 8-2-06, cleaned and coated 8-7-08.
27. 718 Myrtine St: inspected 8-2-06, cleaned and coated 8-7-08.
28. 2164 Griffin Ave: inspected 8-2-06, cleaned and coated 8-7-08.
29. 2133 Montgomery Ave: inspected 8-2-06, cleaned and coated 8-7-08.
30. 38302 Auburn Enumclaw Road: inspected 8-2-06, cleaned and coated 8-5-08.
31. 16050 SE 380th Place: inspected 8-2-06, cleaned and coated 8-5-08.
32. 37654 Auburn Enumclaw Road: inspected 8-2-06, cleaned, coated 8-5-08.
33. 36809 Auburn Enumclaw Road: inspected 8-2-06, cleaned and coated 8-5-08.
34. 36823 Auburn Enumclaw Road: inspected 8-2-06, cleaned and coated 8-5-08.
35. 38302 Auburn Enumclaw Road: inspected 8-2-06, cleaned and coated 8-5-08.
36. 36901 Auburn Enumclaw Road: inspected 8-2-06, cleaned and coated 8-5-08.
37. 37927 Auburn Enumclaw Road: inspected 8-2-06, cleaned and coated 8-5-08.
38. 46919 244th Ave SE: inspected 8-2-06, cleaned and coated 8-8-08.
39. 47007 244th Ave SE: inspected 8-2-06, cleaned and coated 8-8-08.
40. 24401 Mud Mountain Road: inspected 8-2-06, cleaned and coated 8-8-08.
41. 24415 Mud Mountain Road: inspected 8-2-06, cleaned and coated 8-8-08.
42. 24431 Mud Mountain Road: inspected 8-2-06, cleaned and coated 8-8-08.
43. 24521 Mud Mountain Road: inspected 8-2-06, cleaned and coated 8-8-08.
44. 24531 Mud Mountain Road: inspected 8-2-06, cleaned and coated 8-8-08.
45. 24714 Mud Mountain Road: inspected 8-2-06, cleaned and coated 8-8-08.
46. 24706 Mud Mountain Road: inspected 8-2-06, cleaned and coated 8-9-08.
47. 24324 SE 473 St: inspected 8-2-06, cleaned and coated 8-9-08.
48. 24415 SE 473 St: inspected 8-2-06, cleaned and coated 8-9-08.
49. 46908 244th Ave SE (garage): inspected 8-2-06, cleaned and coated 8-9-08.
50. 24418 SE 469th St: inspected 8-2-06, cleaned and coated 8-9-08.

51. 46618 244th Ave SE: inspected 8-2-06, cleaned and coated 8-9-08.
52. 43815 236th Ave SE: inspected 8-4-06, cleaned and coated 8-8-08.
53. 24625 SE 448th St: inspected 8-4-06, cleaned and coated 8-9-08.
54. 2718 Warner Ave W: inspected 8-8-06, cleaned and coated 8-7-08.
55. 119 Semanski St S: inspected 8-8-06, cleaned and coated 8-7-08.
56. 123 Semanski St S: inspected 8-8-06, cleaned and coated 8-7-08.
57. 2706 Roosevelt Ave: inspected 8-8-06, cleaned and coated 8-7-08.
58. 23930 SE 468th Way: inspected 9-8-06, cleaned and coated 8-8-08.
59. 23802 SE 468th Way: inspected 9-8-06, cleaned and coated 8-8-08.
60. 23212 SE 464th St: inspected 9-8-06, cleaned and coated 8-8-08.
61. 23132 SE 464th St: inspected 9-8-06, cleaned and coated 8-8-08.
62. 22505 SE 464th St: inspected 9-8-06, cleaned and coated 8-8-08.
63. 1783 Loraine St: inspected 7-25-06, cleaned and coated 8-8-08.
64. 24601 SE 448 St: inspected 8-4-06, riser wrapped 8-9-08.

6. CFR 192.465 (e) External corrosion control: Monitoring

After the initial evaluation required by §§192.455(b) and (c) and 192.457(b), 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. The operator must determine the areas of active corrosion by electrical survey. . .

Enumclaw has previously been notified in Dockets 930308, 940908 and 951343 of probable violations regarding unprotected services. 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 a:

Enumclaw's staff informed UTC staff that electrical surveys had not been conducted. At the time of the inspection, there were also no Enumclaw records for electrical surveys which supports what Enumclaw told staff.

- | | |
|------------------|------------------|
| 1. 235 Roosevelt | 9. 710 Charwila |
| 2. 2099 Second | 10. 1058 Pioneer |
| 3. 501 Griffin | 11. 2245 Lincoln |
| 4. 825 Dickson | 12. 1204 Pioneer |
| 5. 1079 McKinley | 13. 1205 Harding |
| 6. 760 Charwila | 14. 1251 Harding |
| 7. 734 Charwila | 15. 1221 Pioneer |
| 8. 722 Charwila | 16. 1619 Griffin |

- | | | | |
|-----|------------------------|-----|--|
| 17. | 1627 Griffin | 57. | 1966 Wilson |
| 18. | 1635 Griffin | 58. | 1986 Lowell |
| 19. | 1504 Lafromboise | 59. | 1731 Wilson |
| 20. | 1472 Lafromboise | 60. | 1722 Lowell |
| 21. | 1444 Division | 61. | 3025 Fredrickson |
| 22. | 1526 Division | 62. | 3039 Fredrickson |
| 23. | 1531 Lafromboise | 63. | 3143 Division |
| 24. | 1540 Division | 64. | 3159 Division |
| 25. | 1319 Lafromboise | 65. | 3162 Division |
| 26. | 1431 Marion | 66. | 3212 Division |
| 27. | 1471 Loraine | 67. | 3224 Division |
| 28. | 2309 Stevenson | 68. | 3249 Division |
| 29. | 2909 Harding | 69. | 1918 McHugh |
| 30. | 1731 Lafromboise | 70. | 1325 Jefferson |
| 31. | 1747 Lafromboise | 71. | 2110 Wells |
| 32. | 1761 Lafromboise | 72. | 2010 Wells |
| 33. | 1849 Lafromboise | 73. | 2107 Wells |
| 34. | 1903 Lafromboise | 74. | 2118 Cole |
| 35. | 1955 Lafromboise | 75. | 1313 Washington |
| 36. | 1981 Lafromboise (dog) | 76. | 1902 Porter |
| 37. | 1904 Lafromboise | 77. | 1902 Porter this is on
Enumclaw's list twice so I
listed it twice (maybe house
and garage/shop) |
| 38. | 2141 Griffin | 78. | 2051 Fell |
| 39. | 1776 Lafromboise | 79. | 2150 Porter |
| 40. | 3053 Harding | 80. | 2240 Alpine Place |
| 41. | 2228 Lowell Place | 81. | 2251 Alpine Place |
| 42. | 3129 Harding | 82. | 2271 Alpine Place |
| 43. | 3133 Harding | 83. | 2305 Alpine Place |
| 44. | 3223 Harding | 84. | 2323 Alpine Place |
| 45. | 2046 McHugh | 85. | 1730 Hillcrest |
| 46. | 3252 Division | 86. | 1131 Battersby |
| 47. | 2305 McHugh | 87. | 2034 Fell |
| 48. | 2830 McHugh | 88. | 1703 Washington |
| 49. | 1304 McHugh | 89. | 1705 Marshall |
| 50. | 3053 Porter | 90. | 2030 Park |
| 51. | 2940 Porter | 91. | 2048 Park |
| 52. | 2921 Fredrickson | 92. | 2037 James |
| 53. | 1714 Wilson | 93. | 1807 Marshall |
| 54. | 1830 Wilson | | |
| 55. | 1913 Wilson | | |
| 56. | 1940 Wilson | | |

- | | | | |
|------|--------------------------------|------|---------------------------------|
| 94. | 1835 Marshall | 119. | 3436 Academy Drive |
| 95. | 1635 Myrtle | 120. | 5306 33 rd St |
| 96. | 1622 Myrtle | 121. | 5310 32 nd St SE |
| 97. | 1806 Franklin | 122. | 5330 32 nd St SE |
| 98. | 1615 Washington | 123. | 24608 SE 448 th ST |
| 99. | 1605 Washington | 124. | 37658 Auburn Enumclaw Rd |
| 100. | 1725 Porter | 125. | 23324 SE 436 th St |
| 101. | 1708 Cole | 126. | 44823 228 th Ave SE |
| 102. | 1712 Cole | 127. | 23123 SE 448 th |
| 103. | 1732 Cole | 128. | 24727 SE 448 th St |
| 104. | 1450 Cole | 129. | 23860 SE 471 st St |
| 105. | 117 Semanski | 130. | 23822 SE 472 nd St |
| 106. | 119 Semanski | 131. | 23407 SE 436 th St |
| 107. | 121 Semanski | 132. | 43425 248 th Ave SE |
| 108. | 123 Semanski | 133. | 4341 5 248 th Ave SE |
| 109. | 2464 Kibler | 134. | 235 Griffin, |
| 110. | 1323 Farrelly | 135. | 1811 2 nd St, |
| 111. | 1441 Farrelly | 136. | 3238 Academy Dr, |
| 112. | 1567 Farrelly | 137. | 3818 Division, |
| 113. | 2966 Griffin | 138. | 1178 Harding, |
| 114. | 2970 Griffin | 139. | 1728 Wells, |
| 115. | 2715 Griffin | 140. | 1857 Lafromboise, |
| 116. | 42626 248 th Ave SE | 141. | 1606 Myrtle |
| 117. | 43321 248 th Ave SE | | |
| 118. | 5701 37 th St SE | | |

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 141 unprotected steel services (listed in probable violation 6). In an agreement between Pipeline Staff and the City of Enumclaw, in docket UG-951343, Enumclaw agreed to repair or replace 350 unprotected services by December 1, 2005 as documented in the 10-23-1996 audit closing letter. The 350 unprotected services include the 141 unprotected services not yet remediated.

Finding b:

Remediation was not completed within ninety days after the 2007 atmospheric corrosion inspection noted grade 3 conditions (require immediate repair) at the following locations:

- a. 27113 SE 432th St, 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 St, 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 documentation that either 1522 or 1518 Cole had had a corrosion issue and did not have remediation documentation. During the pre field inspection, on 2-19-2008, staff found and reported a low pipe-to-soil read to Enumclaw. Enumclaw inspected, found corrosion and replaced the service on 4-23-2008 (Staff conducted a crew inspection). Enumclaw did not document this corrosion issue or the ninety day remediation.

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 . . .

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.

Finding a:

Enumclaw's maps do not have specific location measurements for the gas systems facilities such as mains and services. Without exact measurements, Enumclaw cannot document that leak surveys were conducted 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 472nd St. The main cuts

diagonally across a section of land, it did 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.

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 stubs and farm taps.

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:

Enumclaw's cathodic protection records are incorrect. Enumclaw records indicated the service to either 1522 or 1518 Cole was cathodically protected when it was not. It was an isolated service and a portion of the service was not cathodically protected.

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.*

Enumclaw has previously been notified in Dockets 930308 and 000955 of probable violation regarding Gas Leak Records.

Finding a:

Enumclaw's Gas Leak and Repair Report records did not contain the minimum data and information.

1. Gas Leak and Repair Report, dated 8-20-2007, at 415th and Auburn Enumclaw Road
 - a. Name and address of the outside reporting party.
 - b. Date pipe installed
 - c. Magnitude and location of CGI readings left.
 - d. Unique identification number of leak detection equipment.

2. Gas Leak and Repair Report, dated 8-24-2007, at 415th and Auburn Enumclaw Road
 - a. The time of the repair
 - b. Leak grade.
 - c. Name and address of the outside reporting party.
 - d. Size and material that leaked
 - e. Date pipe installed
 - f. Magnitude and location of CGI readings left.
 - g. Unique identification numbers of leak detection equipment.

3. Gas Leak and Repair Report, dated 8-30-2007, at 1720 McHugh
 - a. The location of the leak with sufficient detail to allow the ready location
 - b. Pipeline classification
 - c. Size and material that leaked
 - d. Date pipe installed
 - e. Magnitude and location of CGI readings left.
 - f. Unique identification numbers of leak detection equipment.

4. Gas Leak and Repair Report, dated 9-7-2007, at 38606 Auburn Enumclaw
 - a. The location of the leak with sufficient detail to allow the ready location
 - b. Pipeline classification

- 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 of leak detection equipment.
5. Leak Repair Report 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 and address of the of the outside reporting party
 - e. The pipe condition
 - f. The date the pipe was installed
6. Leak Repair Report dated 2/19/2008, at Roosevelt and 104 feet west of the center line of Farman.
- a. The date the pipe was installed
7. Leak Repair Report dated 2/27/2008, at 1243 Roosevelt E,
- a. The repair date
 - b. The date the pipe was installed
8. Leak Repair Report dated 4-12-2008, at 1031 Loraine,
- a. The repair date
 - b. The name and address of the reporting party
 - c. The serial number of the leak detection equipment used to clear the leak
9. Leak Repair Report dated 4/22/2008, at 1427 Jefferson, the
- a. The location of the leak with sufficient detail to allow the ready location
 - b. The address of the reporting party
 - c. The pipe condition
 - d. The date the pipe was installed

11. **WAC 480-93-186 (2) Leak evaluation**

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(s):

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 CGI reads and 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 3rd party.

12. **WAC 480-93-200(7)(b)(ii) Reporting requirements for operators of gas 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;*

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 9 damage incidents. The following were not included in the 2007 Annual Damage Prevention Statistic Report.

1. 5-14-2007, 2016 Initial 105' S of center line of Initial in Alley, wrap pipe
2. 4-30-2007, 2462 McHugh, wrap pipe
3. 3/21/2007, 420 Rainier, wrap pipe

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;*

- (d) Test pressure;
- (e) Test duration;
- (f) Line pipe size and length;
- (g) Dates and times; and
- (h) Test results.

Finding(s):

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
 - b. Test results
3. The 2007 290th extension did not have the following
 - a. Operator's name
 - b. Pipe length

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 a:

Enumclaw did not have sufficient documentation to demonstrate that leak surveys were conducted over all mains and services in accordance with 480-93-188(1).

Finding b:

Enumclaw did not have sufficient documentation to demonstrate that the service stubs and farm taps were leak surveyed during the 2007 High Pressure Gas Leak Survey in accordance with 480-93-188(1)

Finding c:

Enumclaw did not have sufficient documentation to demonstrate that the 2007 High Pressure Leak Survey was conducted on an updated map. There was no revision date on the map.

Finding d:

Enumclaw's Unprotected Service list was not complete. Enumclaw did not have sufficient documentation of the locations of all unprotected services. The following eight services were missing from the Unprotected Service list

1. 235 Griffin, installed 6-11-1968
2. 1611 2nd St, installed about 5-14-1969
3. 3238 Academy Dr, installed about 9-11-1963
4. 3818 Division, installed about 8-21-1973
5. 1178 Harding, installed about 5-11-1964
6. 1606 Myrtle, installed about 5-10-73
7. 1728 Wells, installed about 9-2-1964
8. 1857 Lafromboise, installed 7-26-1968

Finding e:

Enumclaw did not have sufficient documentation to demonstrate compliance with WAC 480-93-187(1)-(13) Gas Leak Records. Enumclaw had 9 locations where the Gas leak Reports did not contain all 13 requirements.

Finding f:

Enumclaw did not have sufficient documentation to properly prepare the 2007 Annual Damage Prevention Statistics Reports and demonstrate compliance with WAC 480-93-200 (7) (b) (ii)

15. **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 on the following maps. 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 Osceola St and Warner St 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 448th St 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 St from 37978 Auburn Enumclaw Road SE
 - c. On Map Z-15-S, the 6" HP (installed in 1957) changes to 2"pe near 41531 Auburn Enumclaw Road SE
 - d. On Map B-14-N, near 42703 Auburn Enumclaw Road is a 1 ½" steel main going south off the 6"HP
 - e. On Map B-14-N, near 42703 Auburn Enumclaw Road 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 436th, coming off the 6" HP line (installed in 1957)
 - g. On Map C-13-N, at the intersection of the Auburn Enumclaw Road and 196th Ave SE is a 2"pe main that comes off the 6" HP line

3. There is no indication of the transition point from steel to polyethylene 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

4. There is no indication of the Material type (steel or polyethylene) on the following mains and services
 - a. Map C-10-N, the service near the bottom center, there 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 264th Ave SE
 - c. On Map A-6-S, the service at 42222 252nd Way SE
 - d. On Map A-8-N, the main on 228th Ave SE
 - e. On Map A-8-N, the service at 41920 228th Ave SE and the services across the street
 - f. On Map A-8-S, the main on 228th Ave SE
 - g. On Map A-8-S, the service at 42411 228th, the 1st service north of 424th the service at 42406 228th, 42109 228th, the stub at 42024 228th and the service at 41925
 - h. On Map A-9-N, the main on 228th Ave SE
 - i. On Map A-9-N, ten services/stubs on SE 419th St Ave SE
 - j. On Map A-9-S, the main on 228th Ave SE

- k. On Map A-9-S, six services on 228th Ave SE
 - l. On Map B-4-S, eight services on 260th
 - m. On Map B-4-N, four services 266th Ave SE
 - n. On Map B-4-N eight services on SE 427th
 - o. On Map B-4-N, nine services on 260th Ave SE
 - p. On Map B-4-S, ten services on Shannon Lane
 - q. On Map B-4-S, 13 services on McHugh Ave
 - r. On Map B-4-S, three services on McHugh Place
 - s. On Map B-5-N, ten services 260th Ave SE
 - t. On Map B-5-S, 15 services on McHugh
 - u. On Map F-7 N on SE 456th St there is a 6"HP main with no information on the map
 - v. On Map C-10 N, on Auburn Enumclaw Road the 6"HP main with no information on the map
 - w. On Map Y-15 S 6" HP steel main not identified
5. There is no indication of the pipe size on the following mains and services
- a. Map C-10-N, the service near the bottom center, there is a line on SR 164 that comes off the 6" HP line
 - 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 228th Ave SE
 - e. On Map A-9-S, main on 228th Ave SE
 - f. On Map A-8-N, main on 228th Ave SE
 - g. On Map B-4-N, nine services on 260th Ave SE
 - h. On Map B-4-N, six on 266th 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 260th Ave SE has, 10 dates
 - l. On Map B-5-S, 26 services on the map
 - m. On Map F-7 N, on SE 456th St there is a 6"HP main not marked on the map
 - n. On Map C-10 N, on Auburn Enumclaw Road the 6"HP main with no information on the map
 - o. On Map Y-15 S 6" HP steel main not identified
6. There is no indication of the 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 424th and 228 Ave SE
 - e. and the service across the street from 42109 228th Ave SE
7. Map S-20-S lacks detail; creating the appearance that customer pipe is tied directly into Enumclaw's system. This line has no address; the location is on the east side of the map.

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. Enumclaw's Map G-1 was updated 9-18-2006. The map that Enumclaw conducted its 2007 five year leak survey for Section 1, G-1 had a 1/16/2007 revision date, but was not as complete as the map dated 9-18-2006. 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 well over six months, in fact they were installed in 2003, four years before this leak survey was conducted.

16. **WAC 480-93-188(6) Gas leak surveys**

Each gas pipeline company must perform self audits of the effectiveness of its leak detection and recordkeeping programs. Each gas pipeline company must maintain records of the self audits for five years. Self audits must be performed as frequently as necessary, but not to exceed three years between audits. At 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.*

Finding(s):

At the time of the inspection, Enumclaw did not conduct and did not have documentation of self audits being conducted prior to 2008.

17. **CFR 192.739 (a) Pressure limiting and regulating stations: Inspection and testing**
Each pressure limiting station, relief device (except rupture discs), and Pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is. . . . set to control or relieve at the correct pressure consistent with the pressure limits of §192.201(a);

Finding(s):

Enumclaw has five farm taps that by definition are pressure regulating stations and have never been inspected as pressure regulating stations. Farm tap pressure regulator stations are located at the following locations:

1. 5719 Auburn Way S
2. 36823 Auburn Enumclaw Road
3. 151st Ave SE and Auburn Enumclaw Road
4. 37676 Auburn Enumclaw Road SE
5. 188 Ave SE and Auburn Enumclaw Road

18. **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.

Finding(s):

Enumclaw did not take cathodic protection test readings at the following locations:

1. 38606 Auburn Enumclaw, on 9-7-2007.
2. 3038 Gossard, on 5-27-2007.

AREAS OF CONCERN

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(s):

Pete's Pool located at the Enumclaw field house. The meter set assembly is located in a confined area under a deck. Gas cannot escape freely into the atmosphere should an overpressure condition occur.

2. **WAC 480-93-250 Damage prevention**

Each gas pipeline company must comply with chapter 19.122 RCW

Finding(s):

Enumclaw did not use the correct definition of "damage" in preparing its Damage Prevention Statistics Report. This is the direct cause of probable violation No. 12. The correct definition is found in RCW 19.122.

3. **WAC 480-90-328 Meter identification**

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(s):

The City of Enumclaw did not have Enumclaw's name on their natural gas meters. This is important to ensure the proper pipeline operator is contacted during an emergency.

4. **WAC 480-93-185(3) Gas leak investigation**

When leak indications are found to originate from a foreign source (for example, a gasoline tank, a sewer, a marsh or customer-owned 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.*

Finding a:

The Leak Repair Form did 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 includes 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 did not have a place or a comment section to document that the owner was notified that a foreign leak letter was sent by U.S. Mail within twenty four hours.

Finding c:

Enumclaw did not have a procedure in place to record each foreign letter sent for five years.

6 **CFR 192.741 Pressure limiting and regulating stations**

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
 - 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
 - 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
3. 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
 - 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.
4. 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 5-21-2008, 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