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WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250
(360) 664-1160 • TTY (360) 586-8203

Ref. Docket No. PG-051609

October 24, 2005

Chris Searcy, P.E.
Public Works Director
City of Enumclaw
1339 Griffin Avenue
Enumclaw, WA 98022

Dear Mr. Searcy:

Subject: Why there will be a follow-up inspection of the natural gas system owned and operated by the City of Enumclaw

The Washington Utilities and Transportation Commission (Commission) Pipeline Safety staff (Staff) will conduct a follow-up inspection of your natural gas facility Operator Qualification Plan (OQ). This inspection, to be scheduled in the next several weeks, will evaluate whether the employees responsible for maintaining a safe and reliable gas distribution system are properly qualified to do this work. In past inspections, we have found numerous probable violations on the city's natural gas distribution system. This next inspection will further evaluate and determine if it is operated by qualified employees.

Past inspections show pattern of repeat violations

We are concerned that the City of Enumclaw (Enumclaw) continues to struggle with compliance and appears to use our inspections as a quality control mechanism. Below is a chart that illustrates the probable violations that we have found in past inspections.

RMS
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Enumclaw inspection history 1999 through 2002:

Year	Number of Probable Violations	Types of Violations
1999	6	Not having, and failure to follow, Operations and Maintenance procedures.
2000	4	Lack of Operations and Maintenance procedures and bare and unprotected meter components subject to corrosion.
2001	9	Emergency valves not maintained, odorant readings not taken, exceeding maximum operating pressure, lack of timely leak surveys, equipment calibration and cathodic protection monitoring. Inadequate Operations and Maintenance procedures.
2002	4*	Equipment calibration frequency not maintained, leak surveys not conducted and Operations and Maintenance procedures missing.

* 2002 items reported as "items of concern"

After each inspection, Enumclaw has made efforts to bring its system into compliance, yet subsequent inspections reveal additional probable rule violations. We suspect that your system operators may not have adequate technical knowledge to appropriately perform tasks and do not have a thorough understanding of the requirements of both State and Federal pipeline safety regulations.

More problems found in 2004 inspection:

Our 2004 standard inspection resulted in a new series of probable violations. Your system operators failed to comply with requirements for patrolling "mains", monitoring cathodic protection results, and remedying corrosion.

The violations found during the 2004 inspection revealed that your system operators do not take voltage drop into consideration when conducting cathodic protection (CP) surveys. This makes it impossible to know whether the level of CP on their system is adequate enough. Inadequate CP levels can lead to corrosion of steel mains and services. Another probable violation we found was that the system was not patrolled

adequately. These patrols are necessary to ensure that potentially hazardous conditions are found and fixed before they become a danger to the public.

In September 2004, Staff identified a high pressure regulator set (farm tap) which utilized a style of regulator not designed for this type of configuration. If this regulator fails, the increased pressure seen by the outlet side of the regulator could cause the casing to fail and break apart. A survey by Enumclaw personnel identified three additional farm taps configured in this manner. Conditions such as this are considered an abnormal operating condition as outlined in federal safety regulations. Individuals evaluated under the OQ plan must be able to recognize and react to an abnormal operating condition as part of performing assigned covered tasks.

Penalties will be recommended as a last resort

Staff is responsible for making a threshold decision as to when the Commission should consider seeking penalties and corrective actions on probable violations. The history of probable violations and items of concern that have followed Enumclaw inspections are troublesome. Staff has decided to conduct this follow-up inspection to verify the qualifications of your operators. We will also check to see if Enumclaw has corrected past items of noted probable violation. If we find substantial problems in this next inspection, we will likely recommend that the Commission issue a complaint. Pipeline safety complaints carry a maximum penalty of \$25,000 per violation. If a complaint is issued, Enumclaw will have right to answer the complaint as well as a hearing before the Commission as provided in state law.

Our staff will be contacting Enumclaw staff shortly to schedule this follow-up inspection. This inspection will close with an exit interview. We hope that you will be available to participate in this exit interview. Please contact me at (360) 664-1254 if you have any questions concerning this letter.

Sincerely,



Alan E. Rathbun
Pipeline Safety Director

cc. Jim Flisrand, Public Works Operations Manager