



STATE OF WASHINGTON

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. No. Docket PG-110040

CERTIFIED MAIL

September 15, 2011

Bob Titus
Energy Services Director
City of Ellensburg
501 N. Anderson St.
Ellensburg, WA 98926

Dear Mr. Titus:

RE: 2011 Standard Natural Gas Inspection – City of Ellensburg, Washington

We conducted a standard inspection from July 18 - 20, 2011 of the City of Ellensburg's pipeline system in Ellensburg, Washington. The inspection included a records review and inspection of the pipeline facilities.

Our inspection indicates two probable violations as noted in the enclosed report. We also noted two areas of concern, which unless corrected, could potentially lead to future violation of state and/or federal pipeline safety rules.

Your response needed

Please review the attached report and respond in writing by October 17, 2011. The response should include how and when you plan to bring the probable violations into full compliance.

What happens after you respond to this letter?

The attached report presents staff's decision on probable violations and does not constitute a finding of violation by the commission at this time.

After you respond in writing to this letter, there are several possible actions the commission, in its discretion, may take with respect to this matter. For example, the commission may:

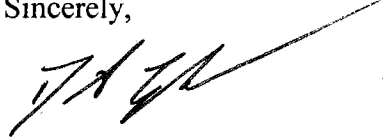
- Issue an administrative penalty under RCW 81.88.040, or
- Institute a complaint, seeking monetary penalties, changes in the company's, practices, or other relief authorized by law, and justified by the circumstances, or
- Consider the matter resolved without further commission action.



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If you have any questions, or if we may be of any assistance, please contact Dave Cullom at (360) 664-1141. Please refer to Docket PG-110040 in any future correspondence regarding this inspection.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Lykken', with a long, sweeping horizontal stroke extending to the right.

David D. Lykken
Pipeline Safety Director

cc. Steve Prue, Gas Engineer

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2011 Intrastate Natural Gas Standard Inspection Report
City of Ellensburg
Docket No. PG-110040

Probable Violations

The following probable violation(s) of Title 49, CFR Part 192 and WAC 480-93 were noted as a result of the inspection of the City of Ellensburg natural gas distribution system in Ellensburg, WA. The inspection included a random selection of records, operation and maintenance (O&M), emergency response and field inspection of the pipeline facilities.

1. **49 CFR §192.321 Installation of plastic pipe.**

(g) *Uncased Plastic pipe may be temporarily installed above ground level under the following conditions:*

(1) *The operator must be able to demonstrate that the cumulative aboveground exposure of the pipe does not exceed the manufacturer's recommended maximum period of exposure or 2 years, whichever is less.*

Finding(s):

During the field portion of the inspection, it was noted that the City of Ellensburg stores its plastic pipe outdoors with no UV protection. Several sections of pipe inspected exceed the two year exposure limit.

| |
|----------------------|
| 12.29.07 – 6in HDPE |
| 02.17.08– 1in HDPE |
| 12.23.07– ½ in HDPE |
| 02.26.06 – ½ in HDPE |
| 03.12.07 – ½ in HDPE |

Pipe used for construction that exceeds two years total UV exposure will need to conform to the complete series of tests as specified by ASTM D2513-99.

2. **WAC 480-93-180 Plans and procedures.**

(1) *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.*

Finding(s):

During the field portion of the inspection, it was noted that the City of Ellensburg stores its plastic pipe outdoors with no UV protection. Several sections of pipe inspected exceed the two year exposure limit. Section 2.2 of the City of Ellensburg O&M manual states that several manufacturers stated that their pipe can be stored indefinitely with

direct UV exposure. The ASTM D-2513-99 is the current version incorporated by reference into 49 CFR Part 192 and still has a two year exposure limit for plastic piping unless it conforms to the complete series of tests as specified by ASTM D2513-99. The O&M manual needs to be updated to be consistent with 49 CFR Part 192.321(g)(1).

Areas of Concern

The following areas of concern of Title 49, CFR Part 192 and WAC 480-93 were noted as a result of the inspection of the City of Ellensburg natural gas distribution system in Ellensburg, WA. These items, if left uncorrected, could potentially lead to future probable violations.

1. **49 CFR §192.615 Emergency Plans**

(b) *Each operator shall:*

- (2) *Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective.*

Finding(s):

The Bluegrass leak was provided as an example of a real world event substituted for a simulation. It was noted by the operator that it was discussed in a City of Ellensburg safety meeting, but no documentation was provided to staff. This documentation is needed to verify the emergency procedure training or incident response was effective.

2. **49 CFR §192.463 External corrosion control: Cathodic protection.**

- (a) *Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in Appendix D of this part. If none of these criteria is applicable, the cathodic protection system must provide a level of cathodic protection at least equal to that provided by compliance with one or more of these criteria.*

Finding(s):

There were no instant offs and no natives present in the records. The Railroad Avenue and Wenas St. had a reading of -860mV on 6/28/2011. Additionally, at Dolarway Rd east of Potts Rd at the Mercer Creek Bridge Crossing, there were "On" readings that were -880mV on 7/26/2010. The method for clearly identifying how the operator considers IR drop at all test stations is unclear.