

Areas of Concern
Docket PG-040210

1. At The Evergreen State College (Evergreen), PSE tied 1,874 feet of 2-inch steel pipe onto Evergreen's 6-inch steel service pipe. Evergreen's 6-inch steel service ends at PSE's 2-inch steel connection, per 49 CFR §192.3's definition of service line, "A service line ends at the outlet of the customer meter or at the connection to a customer's piping, whichever is further downstream, or at the connection to customer piping if there is no meter."

The portion of Evergreen's 6-inch steel service between PSE's 2-inch tie-in and PSE's meter becomes PSE's responsibility by definition and is possibly in violation of several 49 CFR §192 and Chapter 480-93 WAC requirements. Staff recommends that PSE review the Evergreen installation and all other Extended Utility Facilities to ensure all 49 CFR §192 and Chapter 480-93 WAC requirements are being met.

2. PSE's procedure is to forward the Continuing Surveillance Patrol Records form information to PSE's Engineering Department if items are identified that need attention or investigation. The Engineering Department then reviews and schedules the unsatisfactory condition for remedial action. PSE meets the regulation requirements but does not appear to follow up with items identified on the Continuing Surveillance Patrol Records form in a timely manner. The following are examples of items that PSE has identified as areas that require action:

- At Yew St & China Creek Crossing, Loc. #190, and at Marsh Ave, south of Lakeshore Dr over China Creek, Loc. #189, PSE's Continuing Surveillance Patrol Records form notations indicated that the bridge hangers in the middle of the bridge needed to be replaced. The same information was noted during patrols on 9/19/2003, 11/18/2003, 3/4/2004, 4/6/2004 and 6/10/2004. The form noted this was a high priority and needed action. In the comments section of the form, there was a comment dated 9/3/2004, that stated a maintenance request had been sent to PSE's Planning Department. PSE's form indicates that the pipeline and its associated equipment may not have adequate anchors or supports.
- At Black Lake & Black Lake-Bellmore, Loc. ID #365, the Continuing Surveillance Patrol Records form notations indicated that the "bridge continued to settle and was pushing on the 4-inch steel gas main. The

road was also settling and the hangers didn't look right, they were pushing on the gas main." The same information was noted during patrols on 10/8/2003, 12/3/2003, 3/4/2004, 4/2/2004 and 6/8/2004. The form noted this was a high priority and needed action. In the comments section of the form, there was a comment dated 12/5/2003, requesting maintenance and changing the priority to high. PSE provided staff with a SAP work order number 109013107 that shows the construction to be done between 11/04/2002 and 12/28/2005. No action had been taken at the time of the records review. PSE's form indicates that the pipeline and its associated equipment may not have adequate anchors or supports.

- At the Elks Club in Centralia, Loc. #331, located at 2507 Kresky Rd., PSE's Continuing Surveillance Patrol Records form notations indicated that the road was buckling and the asphalt was breaking up by the building. The same information was noted during patrols conducted on 10/6/2004, 10/16/2003, 10/21/2004, 11/18/2004, 1/8/2004, 3/4/2004, 4/6/2004 and 6/10/2004. The form indicated that this was a high priority and no action was required.

Staff requested copies of the patrolling records that are not part of the leak surveys in an e-mail dated 8/25/2004, to be reviewed by staff on 9/7/2004. After staff's information request and before staff's records review, the maintenance request was noted on PSE's Continuing Surveillance Patrol Records form and was sent to PSE's Planning Department on 9/3/2004. After the records review on 11/01/2004, staff was given a copy of work order number 109013107 that scheduled the work to be completed by December 2005.

- At Hawks Prairie Rd, Loc. ID. #179, the Continuing Surveillance Patrol Records form notations indicated that the 4-inch steel main wasn't sitting on the hangers at all. The same information was noted during patrols on 9/19/2003, 12/4/2003, 3/5/2004, 4/20/2004, 6/14/2004 and 8/27/04. This information was sent to PSE's Planning Department on 5/14/04. The form indicated that this was a high priority and needed action. No action had been taken at the time of the records review. PSE's form indicates that the pipeline and its associated equipment may not have adequate anchors or supports.
3. Meter 328107, located at 108 S Tower, is an isolated steel service (CP test site 011287). In 1991, the PSP read was -1.2V. On 9/23/1995, the 1991 read was

entered into PSE's SAP system from the FMS system. In 1995, the SAP system test site 011287 was inspected but there was no PSP read entered into PSE's system, just a note saying, "good PSP read." PSE records were not maintained.

4. At St. Martin's College, 5800 Pacific Ave SE, Lacey, the vent was under the roofline near the roof's edge but did not extend beyond the roofline of the meter enclosure located at the main maintenance building. If gas vented to the atmosphere under a roof, a hazardous situation could result. 49 CFR §192.199 requires that in locations where gas can be discharged into the atmosphere, it should not create undue hazard. PSE extended the vent when staff informed PSE of the situation.