



DEPARTMENT OF PUBLIC WORKS

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WUTC  
Att: Patty Johnson  
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Ms. Johnson:

In reference to our meeting of February 28, 2006, and your draft letter of probable violations, I submit the following points of interest on each item referenced.

In item #1, Required Capacity of Pressure Relieving and Limiting Stations, 49 CFR 192.201(a)(2)(ii), it indicates that the pressure may not exceed the maximum allowable operating pressure, plus 6 psi. Since the installation of the relief valve in July 2000, at the Auburn Academy regulator site, the gas department has made the necessary annual inspections and pressure relief tests. All tests have met requirements and the next scheduled annual test is April 2006. At the time of the inspection in January 2006, it was determined the Enumclaw employees had not followed the procedure as written in the O & M manual. The employees doing the regulator relief test had not shut off a specific test valve, causing less gas pressure against the relief mechanism and more towards the pressure gauge. The result delayed the relief valve from opening, causing the appearance of an improper setting. In further testing after the inspection, and in accordance with the O & M procedure, the relief valve did release at the proper set point. There was no malfunction of the relief and no incorrect set points. The relief valve would have operated properly if a high pressure event had occurred. The only error was in the procedure of testing the relief. A demonstration of this can be done for WUTC staff at any time.

In response to calling this a repeat violation, you referenced UG-000955, which involved an inspection of this same site in June 2000. The city's records were complete and accurate, however, when the test was done, the State inspector indicated the testing procedure was incorrect and connection points for test lines had to be changed. In doing so, the relief valve did not release at set pressure, which caused the city to be in violation. The city brought in a manufacturer's representative and a licensed engineer to review this matter. It was determined that the existing relief valve was sized properly and the tap to test the relief needed to be relocated differently than what was determined at the inspection. Upon completion of the new tap, the older existing Equimeter released properly. However, to appease the WUTC's concerns

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with the relief valve and to be consistent with other regulator stations in manufacturer and maintenance procedures, the city made the decision to change out the 30+ year old relief valve with a new Fisher relief valve, in accordance with the manufacturer's design criteria.

In summary of item #1, the June 2000 inspection resulted in confusion between the WUTC staff and the city in testing procedures. Later review with the manufacturer showed the existing valve was sized properly and with proper testing procedure, the relief valve test was successful. A new Fisher relief valve was installed later, for convenience of maintenance. All relief tests completed since that time have been done in accordance with the O & M procedure. During the January 2006 inspection, a test valve was missed, making the relief test fail and giving the appearance that the set points of the relief were incorrect. In further review after the inspection, the test procedure was redone, in accordance with the O & M procedures, and it was determined that the missed valve caused the relief to open at a higher pressure. In both cases, June 2000 and January 2006, the regulator station was running properly and the relief valves were functioning as designed. Due to tension and inspection pressures in January 2006, the employee had missed a testing step. If that had happened during the annual testing procedure, the employee would have redone the test to determine if any steps had been missed and would have shut off the testing valve.

In reference to item #2, Protection from Damage to Customer Meters and Regulators, 49 CFR 192.355 (b)(i), the city has not had any malfunctions with regulators, regarding outside vents. Typically, the intent is to install vent piping to restrict rain/weather from entering the vents and to install screens to prevent insects. If a vent is protected from weather through placement or other structural object, a 90° bend may not be installed, however, insect resistance has always been a concern. We have found damaged screens in the past and operator error regarding installation. One example of operator error is the violation that you noted in UG-00071. There was a long vent installed on the regulator in question with a 90° bend, however, the employee did not firmly attach or forget to attach the screen which was noted during the inspection of UG-00071.

To resolve this concern, the city will emphasize the importance, through our training procedures, and require a specific sign-off for all regulator vent installations and subsequent maintenance procedures and surveys. The city has corrected all vents noted in your inspection.

The third probable violation referenced, relates to the same physical concern of Inadequate Venting, as expressed in Item #2. I am assuming, however, because more than one CFR is involved, it is necessary to identify each one as a separate violation. Please refer to item #2 for comments on venting and the city's intent to resolve this issue.

Item #4, Procedural Manual for Operations, Maintenance and Emergencies (49 CFR 192.605). This violation appears to address five past inspections, beginning in 1999. The City of Enumclaw is willing to address any and all concerns that the WUTC staff has on these past inspections. Unfortunately, it appears what was asked by the WUTC staff at the time of those previous inspections and submitted, is now inadequate. Changes to the operations and maintenance procedures were requested and we complied. We followed all directions and requests during those previous inspections, though now it appears that what the WUTC requested earlier is not acceptable.

The City of Enumclaw stresses safety in all of our operations and has always complied with the WUTC staff's concerns and guidance. However, it is a bit overwhelming, at this time, to find out that we have not been operating properly for the past six years, regardless of our efforts to address each and every concern WUTC has had during that period.

In December 2005, the city was told that approximately 33 operational procedures were unacceptable and needed to be rewritten. We were given about four weeks to complete them, however, it appears that our efforts were in vain because WUTC staff now states that they "continue to be inadequate or not applicable to Enumclaw's system". The example given on Odorization, Section 4.08, in your draft of probable violations, was rewritten and given to the WUTC staff in January 2006, though the draft of violations, written in late February of this year, indicates the city had not made those changes.

Again, The City of Enumclaw is more than willing to take whatever measures necessary to address the WUTC's concerns. If we must rewrite the Operational Procedures Manual in its entirety, it will be done. It is my observation that, from the past few years to the present, the goal continues to be a moving target. The city has used guidance from large gas companies, licensed engineers and consultants to assist in writing our operation procedures. We do want a safe, effective operational manual. We hope that we can work out a reasonable time frame to complete this task.

Item 5 list of probable violations relates to Odorization of Gas (49 CFR 192.625 (f)). The City of Enumclaw has been using 4% LEL for a number of years. 0.8% has been the point the operators have been using as a guide to assure all reads are under that threshold. As stated in your draft of violations, natural gas is considered to have a LEL of 4 or 5 % concentration of gas in air. Gas companies will select an LEL to use as their standard, however, I am told by other companies they do not test the LEL frequently, if ever. The standard for natural gas is 4 or 5 percent. To be extra safe, the city uses 4 percent. The 49 CFR 192.625 (f) refers to using an odorator to check the percentage of gas in air to determine if the odor is detectable, which the city does, as stated in our operational procedures. All of our reads have detected odorant below the 4 percent LEL. With the natural gas being piped in through William Co. For PSE, Cascade, Enumclaw, and others, from different locations of the country, I believe the national accepted level of 4 or 5 is being used by all. My concern is that I understand exactly what is wanted from the city of Enumclaw. When you stated "Enumclaw does not know the LEL of its gas", I assume you meant that, in our operational procedures, we did not indicate that we are using 4 percent. If there is another issue with this probable violation that is not being addressed, please let me know.

Item #6, Qualification Program (49 CFR 192.805 (b)). The City of Enumclaw uses Local 32 to assist in meeting the OQ requirements. Under 49 CFR 192.805, if the operator has reason to believe an individual is not qualified or needs additional training, that individual is not allowed to do specific functions, unless a qualified individual is present and observing the activity. The individual that the city did not allow to operate the regulator station was not adequately trained, in the city's opinion. The City of Enumclaw controls the work activities of this individual and there was absolutely no confusion, on the city's part, that he was restricted from operating the regulator station.

The City of Enumclaw is required, through 49 CFR 192.805, to observe and evaluate all individuals working on covered tasks and, if necessary, prohibit an individual to work on a specific covered task until further training and requalification. Any individual in any gas company, if OQ trained and qualified, can be pulled from any covered task if the operator feels he is not qualified. As soon as the individual is requalified for the task, he can continue with his normal activities. The City of Enumclaw has five gas employees. There is no confusion as to who is and who is not OQ qualified within the department. The training given by Local 32 is necessary to show the qualifications of each individual, however, it can also be a good training tool for other individuals in operations and/or management to understand more about the natural gas field. In this case, we simply pulled this individual away from doing a specific covered task until additional training is completed. If we need to notify the WUTC staff when additional training is given to any of our employees, we can certainly do that. We are willing to do whatever is necessary to address this.

The last item in your draft of probable violations, relates to an advisory bulletin. On October 25, 2004, WUTC sent an advisory bulletin to all regulated pipelines, recommending several actions to be taken, including changes to plans and procedures and the marking of negative and positive leads inside each rectifier. Unfortunately, neither Administration or Operations had seen that bulletin. We want to follow all state and federal regulations and adjust our procedures accordingly, and will do so immediately upon receiving a copy of that bulletin.

In final response to the draft of probable violations, the city wants to operate a safe gas service for all concerned. We can be more effective in all aspects, if we continue communications and better understand the direction of WUTC. The city has honestly assumed, over the past six years, that we were working with WUTC in correcting our occasional items of concern or probable violations. There was no correspondence or indication that the city was in as severe a situation as indicated in the WUTC letter of October 24, 2005. The City of Enumclaw wishes to work with you in resolving all issues.

Respectively Yours,

  
Jim Flisrand  
Operations Manager