



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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Ref. No. Docket PG-080097

**CERTIFIED MAIL**

November 17, 2008

The Honorable John Wise  
Mayor, City of Enumclaw  
1339 Griffin Avenue  
Enumclaw, Washington 98022

Dear Mayor Wise:

**Subject: 2008 City of Enumclaw Standard Inspection**

The Washington Utilities and Transportation Commission (UTC) staff conducted a natural gas safety standard inspection from June 9 through June 13, 2008, of the City of Enumclaw's (Enumclaw) pipeline system. The inspection included a review of records, procedures and pipeline facilities. In addition, staff held several meetings and conversations with gas system staff and management. Staff conducted an exit interview with Enumclaw officials on October 15, 2008, during which they reviewed the inspection findings. Staff documented 19 state and federal probable safety code violations and six areas of concern, which includes documenting more than 550 instances of the probable code violations. The areas of concern could also potentially lead to future violations of state or federal pipeline safety rules.

The attached Probable Violation Report presents staff's decisions on probable violations and does not constitute a finding of violation by the commission at this time. The report is not necessarily the position or opinion of the commission, should it be called upon to decide these issues in an appropriate proceeding.

Enumclaw is responsible for ensuring that it is in full compliance with all applicable state and federal pipeline safety regulations, and maintains and operates its pipeline system so that it is safe, reliable, and efficient.

This inspection also included a review of Enumclaw's pipeline safety inspection history. As shown in the attached Probable Violation Report, 11 of the 19 probable safety code violations appear to be repeated or multiple repeats of violations identified by staff during past inspections.

Staff finds a pattern with respect to probable violations. In past inspections, after staff notified Enumclaw of a probable safety code violation, Enumclaw would correct the specific instance(s)



identified, but did not implement new written policies or assess where other possible instances of the same safety code problem might exist in their system. After each inspection, it failed to make sufficient changes to procedures to prevent future safety violations.

In October 1996, as a result of several follow-up inspections of Enumclaw facilities connected to docket UG-951343, Enumclaw wrote an October 10, 1996, letter in which it noted 341 unprotected services and stated, "The first leak survey was completed October 9, 1996, and leak surveys will be done twice yearly until all the unprotected service lines are repaired and or inserted." Negotiations resulted in an abatement agreement documented in a commission staff letter to Mark Bauer, Public Works director for Enumclaw dated October 23, 1996. It states:

"Staff accepts your intent to comply with WAC 480.93.110 and understands that in intending to comply, the City of Enumclaw will leak survey unprotected services twice a year, not to exceed eight months. Until which time the unprotected services are replaced or repaired, occurring no later than December 1, 2005."

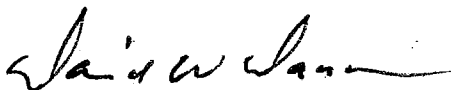
This 2008 inspection was the first standard inspection since December 1, 2005. It determined that Enumclaw did not meet its commitment to commission staff and as of the date of this letter, has still not replaced or repaired all of its unprotected services. This resulted in a probable violation contained in the attached violation report.

The commission has discretion to take various actions with respect to this docket. Commission staff has decided to recommend that the commission issue a complaint in this matter, seeking monetary or other penalties as authorized by law. Once the complaint is issued, Enumclaw will have the opportunity to answer the complaint and to present its position to the commissioners at a hearing.

If you have any questions, please contact Patti Johnson at (360) 664-1266. Please refer to docket number PG-080097 in any future correspondence regarding this inspection.

Thank you for your attention to this matter.

Sincerely,



David W. Danner  
Executive Director and Secretary

Enclosures

cc: Anne F. Soiza, Pipeline Safety Director  
Mark Bauer, City of Enumclaw  
Ed Hawthorne, City of Enumclaw

**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 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.*

**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 does 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 when it was implemented in February 2008.

1. Enumclaw's O&M Manual, Procedure 2-O, Section 5.3 does 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 does 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 does 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 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(s):**

Under commission order (docket UG-960732) the City of Enumclaw was granted a waiver in part to operate portions of its intermediate pipeline segments installed prior to 1978, at a MAOP not to exceed 40 psig. Certain "Farm Tap" style regulators installed on the city's high pressure pipeline system have rupture discs installed to prevent the overpressure of gas services fed by these regulators. The rupture discs installed are rated at between 54 and 57 psig. This exceeds the established MAOP limit plus the 10% allowed should an overpressure condition occur. The following is a list of farm taps that do not meet the requirement:

- |  |   |
|--|---|
| 1. 45527 244 <sup>th</sup> Ave SE          | 24. 41801 180 <sup>th</sup> AVE SE          |
| 2. 45423 244 24 <sup>th</sup> Ave SE       | 25. 41527 Auburn/Enumclaw Hwy               |
| 3. 45317 244 <sup>th</sup> Ave SE          | 26. 40901 Auburn/Enumclaw Hwy               |
| 4. 45203 244 <sup>th</sup> Ave SE          | 27. 39819 Auburn/Enumclaw Hwy               |
| 5. 44807 244 <sup>th</sup> Ave SE          | 28. 39719 Auburn/Enumclaw Hwy               |
| 6. 22233 SE 436 <sup>th</sup> St.          | 29. 39606 Auburn/Enumclaw Hwy               |
| 7. 22109 SE 436 <sup>th</sup> St.          | 30. 39525 Auburn/Enumclaw Hwy               |
| 8. 22025 SE 436 <sup>th</sup> St.          | 31. 39409 Auburn/Enumclaw Hwy               |
| 9. 21928 SE 436 <sup>th</sup> St.          | 32. 39406 Auburn/Enumclaw Hwy               |
| 10. 21611 SE 436 <sup>th</sup> St.         | 33. 39307 Auburn/Enumclaw Hwy               |
| 11. 21416 SE 436 <sup>th</sup> St.         | 34. 38924 Auburn/Enumclaw Hwy               |
| 12. 21207 SE 436 <sup>th</sup> St.         | 35. 38819 Auburn/Enumclaw Hwy               |
| 13. 20911 SE 436 <sup>th</sup> St.         | 36. 38629 Auburn/Enumclaw Hwy               |
| 14. 43706 208 <sup>th</sup> Ave SE         | 37. 38606 Auburn/Enumclaw Hwy               |
| 15. 20613 SE 436 <sup>th</sup> St          | 38. 38501 Auburn/Enumclaw Hwy               |
| 16. 20104 SE 436 <sup>th</sup> St          | 39. 38334 Auburn/Enumclaw Hwy               |
| 17. 20101 SE 436 <sup>th</sup> St          | 40. 38325 Auburn/Enumclaw Hwy               |
| 18. 19120 SE 432 <sup>nd</sup> St          | 41. 38117 Auburn/Enumclaw Hwy               |
| 19. 42906 Auburn-Enumclaw Hwy              | 42. 37978 Auburn/Enumclaw Hwy               |
| 20. 188 <sup>th</sup> /Auburn-Enumclaw Hwy | 43. 37927 Auburn/Enumclaw Hwy               |
| 21. 42705 Auburn/Enumclaw Hwy              | 44. 37739 Auburn/Enumclaw Hwy               |
| 22. 42316 Auburn/Enumclaw Hwy              | 45. 37676 Auburn/Enumclaw Hwy               |
| 23. 42315 Auburn/Enumclaw Hwy              | 46. 151 <sup>st</sup> / Auburn/Enumclaw Hwy |

- |                               |                               |
|-------------------------------|-------------------------------|
| 47. 37637 Auburn/Enumclaw Hwy | 52. 36809 Auburn/Enumclaw Hwy |
| 48. 37326 Auburn/Enumclaw Hwy | 53. 5825 Auburn Way S         |
| 49. 37127 Auburn/Enumclaw Hwy | 54. 5709 Auburn Way S         |
| 50. 37105 Auburn/Enumclaw Hwy | 55. 5636 Auburn Way S         |
| 51. 36823 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 docket in Dockets 930308, 940908, 951343 and 000955 of probable violations regarding casings.**

**Finding a:**

Following are casing that Enumclaw does not have/or did not provide records for and is not inspecting.

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 Rd
  - c. Map C-8-S, Enumclaw Auburn Road and 228<sup>th</sup> Ave SE. The casing that is not tested annually
  - d. Map C-11-N, at SR 164 and 208<sup>th</sup> Ave SE, near State Permit No 1951.
  - e. B-14-N, casing crosses SR164 at 188<sup>th</sup> 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 Rd
  - b. Map C-8-S, casing to 23208 Enumclaw Auburn Rd
  - c. Map C-8-S, casing to 23306 Enumclaw Auburn Rd
  - d. Map C-8-S, casing to 23324 Enumclaw Auburn Rd
  - e. Map E-3-S, on Warner at Blake
  - f. Map E-3-S, on Warner crossing Blake
  
3. 2" steel mains
  - a. Map D-4-S, on Griffin, starting at Blake and ending on Third Street

- b. Map E-4-N, on Blake at Roosevelt

**Finding b:**

Following are service casings that Enumclaw does not have/or did not provide records for and is not inspecting.

- 1. 6" HP main
  - a. Map C-9-N, 22324 SE 436<sup>th</sup> St or the Auburn Enumclaw Rd, map is unclear.
  - b. Map C-9-N, 22004 Auburn Enumclaw Rd
  - c. Map C-10-N, three without addresses on Auburn Enumclaw Road
  - d. Map C-12-N, a farm tap turned dist regulator without 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 Rd and 188<sup>th</sup> Ave SE with a note: State permit 2871
  - g. Map W-16-S, 38924 Auburn Enumclaw Rd
  - 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 Rd
- 2. 2" steel mains
  - a. Map C-8-N, no address, it is N of 43422 228<sup>th</sup> Ave SE
  - b. Map A-4-S, 3/4" service at 42102 264<sup>th</sup> Ave SE
  - c. Map A-4-S, 1" service at 42410 264<sup>th</sup> Ave SE
  - d. Map B-4-S, 3/4" service at 42926 264<sup>th</sup> 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" steel mains
  - a. Map D-7-N, 23718 SE 440<sup>th</sup> St
  - b. Map D-7-N, 23924 SE 440<sup>th</sup> St
  - c. Map D-7-N, 24018 SE 440<sup>th</sup> St
  - d. Map D-7-N, 24216 SE 440<sup>th</sup> St
  - e. Map D-7-N, 43909 241<sup>st</sup> 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:**

All of the services inspected in 2007 were not inspected in the previous 36 to 39 months. All the services inspected in 2006 were not inspected in the previous 36 to 39 month period. To ensure pipeline safety, it is expected that operators establish atmospheric corrosion processes that meet the code.

**Finding b:**

The following locations on the 2007 Atmospheric Corrosion Control Inspection form were scheduled to be inspected in 2007. They were not 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 <sup>th</sup> 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 adequate training in order to implement the new O&M Manual including policies and procedures to ensure pipeline safety of the system. Enumclaw's 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 covers updating maps within six months of the completion of a construction activity and making them 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.
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 covers 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 that remedial action was completed within 90 days. An example is between Cole Street and Initial Street addressed at 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.
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). On the Leak Repair Report for a bad weld at Roosevelt at 104' West of the centerline of Forman the perimeter of the leak was not identified.



6. Procedure 2-O, Section 6.4: This procedure requires remediation to be documented on form 2-O-3, Corrosion Control Remedial Action Report. Enumclaw does not consistently use this form.
7. Appendix 3-B-2, the 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. The map that Enumclaw conducted its 2007 High Pressure leak survey on is an example.
10. Procedure 2-D, Section 4.4 (e): This procedure requires that after third party excavation damage to services, a gas leak survey shall be performed from the point of damage to the service tie in. The intent of this WAC was clearly to have a leak survey conducted at the time of the repair.
11. 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 2006 and 2007 atmospheric corrosion inspections, Enumclaw did not meet the 3 year not to exceed 39 month requirement.
12. Procedure 2-O, Section 5.3: This procedure requires grading the atmospheric corrosion conditions found. During the 2006 atmospheric corrosion inspection, grading that was not approved in Enumclaw's O&M Manual was used at least nine times.
13. Procedure 2-O, Section 5.3 (c) requires that when a condition 2 is found during an atmospheric corrosion inspection, remediation must be completed in 12 months. Enumclaw did not complete the 2006 atmospheric corrosion remediation for the 2006 atmospheric corrosion inspection in the required time frame.
  1. 3429 McHugh Place, inspected on 7-24-2006, cleaned and coated on 7-26-2008
  2. 3136 Academy Dr SE, 7-24-2006 inspected, 7-26-2007 cleaned and coated
  3. 3133 Academy Dr SE, 7-24-2006 inspected, 7-26-2007 cleaned and coated
  4. 3132 Academy Dr SE, 7-24-2006 inspected, 7-26-2007 cleaned and coated
  5. 5302 33nd Street SE and Academy Dr SE, 7-24-2006 inspected, 7-26-2007 cleaned and coated

6. 1940 Wilson, 7-24-2006 inspected, 7-26-2008 cleaned and coated
7. 3429 McHugh Place, 7-24-2006 inspected, 7-26-2008 cleaned and coated
8. 20625 SE 436<sup>th</sup> Street, 7-24-2006 inspected, 7-26-2008 cleaned and coated
9. 24112 SE 440<sup>th</sup> St, 7-24-2006 inspected, 7-26-2008 cleaned and coated
10. 1856 Loraine Street, 7-24-2006 inspected, 7-26-2008 cleaned and coated
11. 23123 SE 464<sup>th</sup> Street, 7-24-2006 inspected, 7-26-2008 cleaned and coated
12. 1192 Harding Street, 7-31-2006 inspected, 8-8-2008 cleaned and coated
13. 1185 Harding Street, inspected 7-31-2006, 8-8-2008 cleaned and coated
14. 1121 Garfield Street, inspected 7-31-2006, 8-8-2008 cleaned and coated
15. 3245 Academy Dr SE, inspected 7-31-2008, 8-8-2008 cleaned and coated
16. 3335 Academy Dr SE, inspected 7-31-2008, 8-8-2008 cleaned and coated
17. 3339 Academy Dr SE, inspected 7-31-2008, 8-8-2008 cleaned and coated
18. 3443 Academy Dr SE, inspected 7-31-2008, 8-8-2008 cleaned and coated
19. 3525 Academy Dr SE, inspected 7-31-2008, 8-8-2008 cleaned and coated
20. 3607 Academy Dr SE, inspected 7-31-2008, 8-8-2008 cleaned and coated
21. 3245 Academy Dr SE, inspected 7-31-2008, 8-8-2008 cleaned and coated
22. 3611 Academy Dr SE, inspected 7-31-2008, 8-8-2008 cleaned and coated
23. 3617 Academy Dr SE, inspected 7-31-2008, 8-8-2008 cleaned and coated
24. 825 Myrtine Street, inspected 8-2-2006, 8-7-2008 cleaned and coated
25. 755 Myrtine Street, inspected 8-2-2006, 8-7-2008 cleaned and coated
26. 741 Myrtine Street, inspected 8-2-2006, 8-7-2008 cleaned and coated
27. 706 Myrtine Street, inspected 8-2-2006, 8-7-2008 cleaned and coated
28. 718 Myrtine Street, inspected 8-2-2006, 8-7-2008 cleaned and coated
29. 2164 Griffin Ave, inspected 8-2-2006, 8-7-2008 cleaned and coated
30. 2133 Montgomery Ave, inspected 8-2-2006, 8-7-2008 cleaned and coated
31. 38302 Auburn Enumclaw Road, inspected 8-2-2006, 8-5-2008 cleaned and coated
32. 16050 SE 380<sup>th</sup> Place, inspected 8-2-2006, 8-5-2008 cleaned and coated
33. 37654 Auburn Enumclaw Road, inspected 8-2-2006, 8-5-2008 cleaned and coated
34. 36809 Auburn Enumclaw Road, inspected 8-2-2006, 8-5-2008 cleaned and coated
35. 36823 Auburn Enumclaw Road, inspected 8-2-2006, 8-5-2008 cleaned and coated
36. 38302 Auburn Enumclaw Road, inspected 8-2-2006, 8-5-2008 cleaned and coated
37. 36901 Auburn Enumclaw Road, inspected 8-2-2006, 8-5-2008 cleaned and coated
38. 37927 Auburn Enumclaw Road, inspected 8-2-2006, 8-5-2008 cleaned and coated

39. 46919 244<sup>th</sup> Ave SE, inspected 8-2-2006, 8-8-2008 cleaned and coated
40. 47007 244<sup>th</sup> Ave SE, inspected 8-2-2006, 8-8-2008 cleaned and coated
41. 24401 Mud Mountain Rd, inspected 8-2-2006, 8-8-2008 cleaned and coated
42. 24415 Mud Mountain Rd, inspected 8-2-2006, 8-8-2008 cleaned and coated
43. 24431 Mud Mountain Rd, inspected 8-2-2006, 8-8-2008 cleaned and coated
44. 24521 Mud Mountain Rd, inspected 8-2-2006, 8-8-2008 cleaned and coated
45. 24531 Mud Mountain Rd, inspected 8-2-2006, 8-8-2008 cleaned and coated
46. 24714 Mud Mountain Rd, inspected 8-2-2006, 8-8-2008 cleaned and coated
47. 24706 Mud Mountain Rd, inspected 8-2-2006, 8-8-2008 cleaned and coated
48. 24324 SE 473 Street, inspected 8-2-2006, 8-9-2008 cleaned and coated
49. 24415 SE 473 Street, inspected 8-2-2006, 8-9-2008 cleaned and coated
50. 46908 244<sup>th</sup> Ave SE (garage), inspected 8-2-2006, 8-9-2008 cleaned and coated
51. 24418 SE 469<sup>th</sup> Street, inspected 8-2-2006, 8-9-2008 cleaned and coated
52. 46618 244<sup>th</sup> Ave SE, inspected 8-2-2006, 8-9-2008 cleaned and coated
53. 43815 236<sup>th</sup> Ave SE, inspected 8-4-2006, 8-8-2008 cleaned and coated
54. 24625 SE 448<sup>th</sup> Street, inspected 8-4-2006, 8-9-2008 cleaned and coated
55. 2718 Warner Ave W, inspected 8-8-2006, 8-7-2008 cleaned and coated
56. 119 Semanski Street South, inspected 8-8-2006, 8-7-2008 cleaned and coated
57. 123 Semanski Street South, inspected 8-8-2006, 8-7-2008 cleaned and coated
58. 2706 Roosevelt Ave, inspected 8-8-2006, 8-7-2008 cleaned and coated
59. 23930 SE 468<sup>th</sup> Way, inspected 9-8-2006, 8-8-2008 cleaned and coated
60. 23802 SE 468<sup>th</sup> Way, inspected 9-8-2006, 8-8-2008 cleaned and coated
61. 23212 SE 464<sup>th</sup> Street, inspected 9-8-2006, 8-8-2008 cleaned and coated
62. 23132 SE 464<sup>th</sup> Street, inspected 9-8-2006, 8-8-2008 cleaned and coated
63. 22505 SE 464<sup>th</sup> Street, inspected 9-8-2006, 8-8-2008 cleaned and coated

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. . . However, on distribution lines and where an electrical survey is impractical on transmission lines, areas of active corrosion may be determined by other means that include review and analysis of leak repair and inspection records, corrosion monitoring records, exposed pipe inspection records, and the pipeline environment. . . .*

**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 has not conducted and documented electrical surveys to determine if there are areas of active corrosion. Also, Enumclaw's Unprotected Leak Survey listed 133 of the actual 141 unprotected services. Following are the 141 unprotected services.

- |                      |                            |
|----------------------|----------------------------|
| 1. 235 Roosevelt     | 21. 1444 Division          |
| 2. 2099 Second       | 22. 1526 Division          |
| 3. 501 Griffin       | 23. 1531 Lafromboise       |
| 4. 825 Dickson       | 24. 1540 Division          |
| 5. 1079 McKinley     | 25. 1319 Lafromboise       |
| 6. 760 Charwila      | 26. 1431 Marion            |
| 7. 734 Charwila      | 27. 1471 Loraine           |
| 8. 722 Charwila      | 28. 2309 Stevenson         |
| 9. 710 Charwila      | 29. 2909 Harding           |
| 10. 1058 Pioneer     | 30. 1731 Lafromboise       |
| 11. 2245 Lincoln     | 31. 1747 Lafromboise       |
| 12. 1204 Pioneer     | 32. 1761 Lafromboise       |
| 13. 1205 Harding     | 33. 1849 Lafromboise       |
| 14. 1251 Harding     | 34. 1903 Lafromboise       |
| 15. 1221 Pioneer     | 35. 1955 Lafromboise       |
| 16. 1619 Griffin     | 36. 1981 Lafromboise (dog) |
| 17. 1627 Griffin     | 37. 1904 Lafromboise       |
| 18. 1635 Griffin     | 38. 2141 Griffin           |
| 19. 1504 Lafromboise | 39. 1776 Lafromboise       |
| 20. 1472 Lafromboise | 40. 3053 Harding           |

- |     |  |      |                                |
|-----|--|------|--------------------------------|
| 41. | 2228 Lowell Place  | 78.  | 2051 Fell                      |
| 42. | 3129 Harding   | 79.  | 2150 Porter                    |
| 43. | 3133 Harding   | 80.  | 2240 Alpine Place              |
| 44. | 3223 Harding   | 81.  | 2251 Alpine Place              |
| 45. | 2046 McHugh  | 82.  | 2271 Alpine Place              |
| 46. | 3252 Division  | 83.  | 2305 Alpine Place              |
| 47. | 2305 McHugh  | 84.  | 2323 Alpine Place              |
| 48. | 2830 McHugh  | 85.  | 1730 Hillcrest                 |
| 49. | 1304 McHugh  | 86.  | 1131 Battersby                 |
| 50. | 3053 Porter  | 87.  | 2034 Fell                      |
| 51. | 2940 Porter  | 88.  | 1703 Washington                |
| 52. | 2921 Fredrickson   | 89.  | 1705 Marshall                  |
| 53. | 1714 Wilson  | 90.  | 2030 Park                      |
| 54. | 1830 Wilson  | 91.  | 2048 Park                      |
| 55. | 1913 Wilson  | 92.  | 2037 James                     |
| 56. | 1940 Wilson  | 93.  | 1807 Marshall                  |
| 57. | 1966 Wilson  | 94.  | 1835 Marshall                  |
| 58. | 1986 Lowell  | 95.  | 1635 Myrtle                    |
| 59. | 1731 Wilson  | 96.  | 1622 Myrtle                    |
| 60. | 1722 Lowell  | 97.  | 1806 Franklin                  |
| 61. | 3025 Fredrickson   | 98.  | 1615 Washington                |
| 62. | 3039 Fredrickson   | 99.  | 1605 Washington                |
| 63. | 3143 Division  | 100. | 1725 Porter                    |
| 64. | 3159 Division  | 101. | 1708 Cole                      |
| 65. | 3162 Division  | 102. | 1712 Cole                      |
| 66. | 3212 Division  | 103. | 1732 Cole                      |
| 67. | 3224 Division  | 104. | 1450 Cole                      |
| 68. | 3249 Division  | 105. | 117 Semanski                   |
| 69. | 1918 McHugh  | 106. | 119 Semanski                   |
| 70. | 1325 Jefferson   | 107. | 121 Semanski                   |
| 71. | 2110 Wells   | 108. | 123 Semanski                   |
| 72. | 2010 Wells   | 109. | 2464 Kibler                    |
| 73. | 2107 Wells   | 110. | 1323 Farrelly                  |
| 74. | 2118 Cole  | 111. | 1441 Farrelly                  |
| 75. | 1313 Washington  | 112. | 1567 Farrelly                  |
| 76. | 1902 Porter  | 113. | 2966 Griffin                   |
| 77. | 1902 Porter this is on<br>Enumclaw's list twice so I<br>listed it twice (maybe house<br>and garage/shop) | 114. | 2970 Griffin                   |
|     |  | 115. | 2715 Griffin                   |
|     |  | 116. | 42626 248 <sup>th</sup> Ave SE |
|     |  | 117. | 43321 248 <sup>th</sup> Ave SE |

- |      |                                 |      |                                   |
|------|---------------------------------|------|-----------------------------------|
| 118. | 5701 37 <sup>th</sup> St SE     | 131. | 23407 SE 436 <sup>th</sup> Street |
| 119. | 3436 Academy Drive              | 132. | 43425 248 <sup>th</sup> Ave SE    |
| 120. | 5306 33 <sup>rd</sup> St        | 133. | 4341 5 248 <sup>th</sup> Ave SE   |
| 121. | 5310 32 <sup>nd</sup> Street SE | 134. | 235 Griffin,                      |
| 122. | 5330 32 <sup>nd</sup> Street SE | 135. | 1611 2 <sup>nd</sup> Street,      |
| 123. | 24608 SE 448 <sup>th</sup> ST   | 136. | 3238 Academy Dr,                  |
| 124. | 37658 Auburn Enumclaw Rd        | 137. | 3818 Division,                    |
| 125. | 23324 SE 436 <sup>th</sup> St   | 138. | 1178 Harding,                     |
| 126. | 44823 228 <sup>th</sup> Ave SE  | 139. | 1728 Wells,                       |
| 127. | 23123 SE 448 <sup>th</sup>      | 140. | 1857 Lafromboise,                 |
| 128. | 24727 SE 448 <sup>th</sup> St   | 141. | 1606 Myrtle                       |
| 129. | 23860 SE 471 <sup>st</sup> St   |      |                                   |
| 130. | 23822 SE 472 <sup>nd</sup> St   |      |                                   |

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 approximately 350 unprotected services as they committed to 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 b:**

Repairs were not made within ninety days after the 2007 atmospheric corrosion inspection noted grade 3 conditions (require immediate repair). Enumclaw did not complete remedial action within ninety days at the following locations:

- a. 27113 SE 432th Street, 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 Street, 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 and did not provide documentation that in the alley between Cole and Initial, addressed as either 1522 or 1518 Cole was a corrosion issue and did not have a ninety day remediation date. During the pre field inspection, on 2-19-2008, staff found and reported to Enumclaw a low pipe-to-soil read. Enumclaw inspected, found corrosion and replaced the service on 4-23-2008 (Staff conducted a crew inspection). Other than a phone message note from the day staff reported the low pipe to soil read, Enumclaw did not document this as a corrosion issue, only a replaced service. Enumclaw did not document this corrosion issue or 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 measurements for main and service locations on the maps. Without exact measurements, Enumclaw cannot document that they leak surveyed 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 472<sup>nd</sup> Street. The main cuts diagonally across a section of land, it does 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 stub 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 a:**

Enumclaw did not have and did not provide documentation that remedial action was completed within ninety days in the alley between Cole and Initial addressed at either 1522 or 1518 Cole. During the pre field inspection, on 2-19-2008, staff found and reported to Enumclaw a low pipe-to-soil read. Enumclaw inspected, found corrosion and replaced the service on 4-23-2008 (Staff conducted a crew inspection). Other than a phone message note from the day staff reported the low pipe-to-soil read. Enumclaw did not document this corrosion issue or ninety day remediation.

**Finding b:**

Enumclaw did not provide or did not have sufficient documentation of the locations of insulated fittings.

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:**

The leak records did not contain the minimum data and information required to permit the commission to assess the adequacy of the operator's leakage program.

1. Gas Leak and Repair Report, dated 9-7-2007, at 38606 Auburn Enumclaw
  - a. Location of the leak (sufficiently described to allow ready location by other qualified personnel).
  - b. Pipeline classification (e.g., distribution main / service).
  - 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 (such as serial numbers) of leak detection equipment.
  
2. Gas Leak and Repair Report, dated 8-30-2007, at 1720 McHugh
  - a. Location of the leak (sufficiently described to allow ready location by other qualified personnel).
  - b. Pipeline classification (e.g., distribution main/ service).
  - c. Size and material that leaked (e.g., steel, plastic, cast iron).
  - d. Date pipe installed
  - e. Magnitude and location of CGI readings left.
  - f. Unique identification numbers (such as serial numbers) of leak detection equipment.
  
3. Gas Leak and Repair Report, dated 8-20-2007, at 415<sup>th</sup> and Auburn Enumclaw
  - a. If reported by an outside party, the name and address of the reporting party.
  - b. Date pipe installed
  - c. Magnitude and location of CGI readings left.
  - d. Unique identification numbers (such as serial numbers) of leak detection equipment.

4. Gas Leak and Repair Report, dated 8-24-2007, at 415<sup>th</sup> and Auburn Enumclaw
  - a. The time of the repair
  - b. Leak grade.
  - c. If reported by an outside party, the name and address of the reporting party.
  - d. Size and material that leaked (e.g., steel, plastic, cast iron).
  - e. Date pipe installed
  - f. Magnitude and location of CGI readings left.
  - g. Unique identification numbers (such as serial numbers) of leak detection equipment.
  
5. Leak Repair form dated 4-12-2008, at 1031 Loraine,
  - a. The repair date
  - b. The name of the reporting party
  - c. The address of the reporting party
  - d. The serial number of the leak detection equipment used to clear the leak
  
6. Leak Repair Form 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 of the person reporting the leak
  - e. The address of the person reporting the leak
  - f. The pipe condition
  - g. The cause of the leak
  - h. The date the pipe was installed
  
7. Leak Repair Form dated 4/22/2008, at 1427 Jefferson, the
  - a. The date and time
  - b. The location of the leak with sufficient detail to allow the ready location
  - c. The address of the reporting party
  - d. The pipe condition
  - e. The date the pipe was installed
  
8. Leak Repair Form dated 2/27/2008, at 1243 Roosevelt E,
  - a. The date and time the leak was detected w
  - b. The repair date
  - c. The date the pipe was installed

9. Leak Repair Form dated 2/19/2008, at Roosevelt and 104 feet west of the center line of Farman.
  - a. The date the pipe

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 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 3<sup>rd</sup> 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(s):**

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 10 damage incidents.

1. 3-19-2007, 1155 Spruce, repair 1" pipe
2. 5-14-2007, 2016 Initial 105' S of center line of Initial in Alley, wrap pipe
3. 9-14-2007, 494 Bondgard, repair ½ pipe
4. 4-30-2007, 2462 McHugh, wrap pipe

5. 3/21/2007, 420 Rainier, wrap pipe
6. 9-7-2007, 38606 Auburn Enumclaw, pulled dresser
7. 8-30-2007, 1730 McHugh, replace part of 1/2" service
8. 4-30-2007, 2462 McHugh, wrap pipe
9. 8-20-2007, 415<sup>th</sup> and Auburn Enumclaw, damaged main
10. 8-24-2007, 415<sup>th</sup> and Auburn Enumclaw, damaged main and valve

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 290<sup>th</sup> 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(s):**

Enumclaw did not update its maps within 6 months

1. For the 2007 five year leak survey, quarter section map G 1, dated 1/16/2007 was used. The quarter section map was less complete than the half quarter map G1 dated 9/18/06.
2. The map used for the 2007 High Pressure Leak Survey did not have a revision date on it. Enumclaw must include both the accurate print date and revision date.

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. 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 Osceloa Street and Warner Street 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 228<sup>th</sup> Ave Se and SE 448<sup>th</sup> Street 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 following 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 street from 37978 Auburn Enumclaw Rd SE
  - c. On Map Z-15-S, the 6" HP (installed in 1957) changes to 2" pe near 41531 Auburn Enumclaw Rd SE
  - d. On Map B-14-N, near 42703 Auburn Enumclaw Rd is a 1 1/2" steel main going south off the 6" HP
  - e. On Map B-14-N, near 42703 Auburn Enumclaw Rd is a 2" pe main going north off the 6" HP line

- f. On Map C-10-N, near 21928 SE 436<sup>th</sup> is the steel service crossing 436<sup>th</sup> coming off the 6" HP line (installed in 1957)
  - g. On Map C-13-N, at the intersection of the Auburn Enumclaw Rd and 196<sup>th</sup> Ave SE is a 2"pe main that comes off the 6" HP line
3. The transition point from steel to pe 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. The Material type (steel or pe) 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 264<sup>th</sup> Ave SE
  - c. On Map A-6-S, the service at 42222 252<sup>nd</sup> Way SE
  - d. On Map A-8-N, the main on 228<sup>th</sup> Ave SE
  - e. On Map A-8-N, the service at 41920 228<sup>th</sup> Ave SE and the services across the street
  - f. On Map A-8-S, the main on 228<sup>th</sup> Ave SE
  - g. On Map A-8-S, the service at 42411 228<sup>th</sup>, the 1<sup>st</sup> service north of 424<sup>th</sup> the service at 42406 228<sup>th</sup>, 42109 228<sup>th</sup>, the stub at 42024 228<sup>th</sup> and the service at 41925
  - h. On Map A-9-N, the main on 228<sup>th</sup> Ave SE
  - i. On Map A-9-N, ten services/stubs on SE 419<sup>th</sup> St Ave SE
  - j. On Map A-9-S, the main on 228<sup>th</sup> Ave SE
  - k. On Map A-9-S, six services on 228<sup>th</sup> Ave SE
  - l. On Map B-4-S, eight services on 260<sup>th</sup>
  - m. On Map B-4-N, four services 266<sup>th</sup> Ave SE
  - n. On Map B-4-N eight services on SE 427<sup>th</sup>
  - o. On Map B-4-N, nine services on 260<sup>th</sup> 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 260<sup>th</sup> Ave SE
  - t. On Map B-5-S, 15 services on McHugh
  - u. On Map F-7 N on SE 456<sup>th</sup> Street there is a 6"HP main with no information on the map
  - v. On Map C-10 N, on Auburn Enumclaw Rd the 6"HP main with no information on the map

- w. On Map Y-15 S 6" HP steel main not identified
5. 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 228<sup>th</sup> Ave SE
  - c. On Map A-9-N, main on 228<sup>th</sup> Ave SE
  - d. On Map A-9-N, two services without addresses 228<sup>th</sup> Ave SE
  - e. On Map A-9-S, main on 228<sup>th</sup> Ave SE
  - f. On Map A-8-N, main on 228<sup>th</sup> Ave SE
  - g. On Map B-4-N, nine services on 260<sup>th</sup> Ave SE
  - h. On Map B-4-N, six on 266<sup>th</sup> Ave SE
  - i. On Map B-4-S, six services on 260<sup>th</sup> Ave SE
  - j. On Map B-4-S, seven services on McHugh Ave
  - k. On Map B-5-N, eight services 260<sup>th</sup> Ave SE has, 10 dates
  - l. On Map B-5-S, 26 services on the map
  - m. On Map F-7 N, on SE 456<sup>th</sup> Street there is a 6"HP main not marked on the map
  - n. On Map C-10 N, on Auburn Enumclaw Rd the 6"HP main with no information on the map
  - o. On Map Y-15 S 6" HP steel main not identified
6. The install dates on the following mains and services
- a. On Map V-17-S, 37978 Auburn Enumclaw Rd SE
  - b. On Map V-17-S, 16050 SE 380<sup>th</sup> Place
  - c. On Map C-10-N, near 21928 SE 436<sup>th</sup>
  - d. On Map A-4-S, 42121, 42213, and 42229 264<sup>th</sup> Ave SE
  - e. On Map A-6-S, 42312. 42222 and 42132 252<sup>nd</sup> Way SE
  - f. On Map A-8-N, main on 228<sup>th</sup> Ave SE
  - g. On Map A-8-S, main on 228<sup>th</sup> Ave SE
  - h. On Map A-9-N, main on 228<sup>th</sup> Ave SE
  - i. On Map A-9-N, two services without addresses on 22<sup>8th</sup> Ave SE
  - j. On Map A-9-S, main on 228<sup>th</sup> Ave SE
  - k. On Map B-4-N, ten services on 260<sup>th</sup> Ave SE
  - l. On Map B-4-N, fourteen on 266<sup>th</sup> Ave SE
  - m. On Map B-4-S, eleven services on 260<sup>th</sup> Ave SE
  - n. On Map B-4-S, eleven services on Shannon Lane
  - o. On Map B-4-S, 34 services on McHugh Ave
  - p. On Map B-5-N, ten services 260<sup>th</sup> Ave SE
  - q. On Map B-5-S, 43 services on the map

- r. On Map F-7 N, on SE 456<sup>th</sup> Street there is a 6"HP main not marked on the map
  - s. On Map C-10 N, on Auburn Enumclaw Rd the 6"HP main
  - t. On Map Y-15 S 6" HP steel main
7. There is no 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 436<sup>th</sup>, near the center of the map
  - c. On Map A-9-N, the two services on 228<sup>th</sup> Ave SE
  - d. On Map A-9-S, the service near the intersection of 424<sup>th</sup> and 228 Ave SE
  - e. and the service across the street from 42109 228<sup>th</sup> Ave SE
8. Map S-20-S there is a line marked customer piping tied into a 2" pe Enumclaw main. Location is on the east side of the map, there are no addresses.

**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. The map that Enumclaw conducted its 2007 five year leak survey for Section 1, G-1 had a 1/16/2007 revision date. 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 over six months.

16. **WAC 480-93-188 (4)(e) Gas Leak Surveys**

*Each gas pipeline company must conduct special leak surveys under the following circumstances: . . . (e) After third-party excavation damage to services, each gas pipeline company must perform a gas leak survey from the point of damage to the service tie-in.*

**Finding(s):**

Enumclaw did not conduct a special leak survey from the point of damage to the service tie in at the following 3<sup>rd</sup> party damage locations:

- 1. 1730 McHugh, on 8-30-2007, a damaged ½" line



2. 494 Bondgard, on 9-14-2007, a damaged ½” line
3. 38606 Auburn Enumclaw, on 9-7-2007, steel service pulled from dresser coupling
4. Loraine and Griffin on 1-20-2008 a 1 ¼”pe service line was hit
5. 1427 Jefferson on 4-22-2008 a ½” pe service was damaged and repaired

17. **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 2007.

18. **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 stations and have never been inspected annually. Pressure regulator stations are located at the following locations:

1. 5719 Auburn Way S
2. 36823 Auburn Enumclaw Rd
3. 151<sup>st</sup> Ave SE and Auburn Enumclaw Rd
4. 37676 Auburn Enumclaw Rd SE
5. 188 Ave SE and Auburn Enumclaw Rd

19. **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 reading at the following locations:

1. at 38606 Auburn Enumclaw, on 9-7-2007.
2. at 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. The correct definition is found in RCW 19.122. Enumclaw participates in a qualified "one-call" system. This did cause a probable violation No. 16.

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 does not have Enumclaw's name on their natural gas meters.

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 does 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 covers 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 does 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.

5. The 2008 O&M Manual is missing at least two electronic links. The missing links may have lead to probable violations or could lead to future probable violations. Consequently, Enumclaw did not do leak survey from the point of damage back to the service tie in. This is may have lead to probable violation #16.
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



**DEPARTMENT OF PUBLIC WORKS**

October 10, 1996

Washington Utilities & Transportation Commission  
P. O. Box 47250  
Olympia, WA 98504-7250

To Whom It May Concern:

The City of Enumclaw has 341 unprotected services. During a leak survey, of the unprotected services, 3 underground leaks were found. Two of these leaks have been repaired by insertion and the third leak is on the schedule to be done the week of October 14th, 1996, as it is a grade 3 leak.

The first leak survey was completed on October 9, 1996 and leak surveys will be done twice yearly until all the unprotected service lines are repaired and or inserted.

All procedures have been updated and revisions made in all the O & M Manuals including the State's copy.

Sincerely,

Don Mosley  
Gas Manager



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250  
(360) 753-6423 • TTY (360) 586-8203

Ref. No.: 6-1115

October 23, 1996

Mr. Mark Bauer  
Public Works Director  
City of Enumclaw  
1309 Myrtle Street  
Enumclaw, Washington 98022

Dear Mr. Bauer:

Subject: UG-951343 Natural Gas Pipeline Safety Audit

Since my last letter of May 6, 1996, the Pipeline Safety Staff made several follow up inspections of your facilities. The Washington Utilities and Transportation Commission (Commission) has received the revised procedures for City of Enumclaw's Operations and Maintenance Manual. Upon review, staff found these procedures to be acceptable and in compliance to the procedural violations which were previously listed in the above referenced letter. In addition, it was noted that pipe in your inventory has been marked as required for natural gas service, therefore, providing compliance to a *violation of marking of materials*. Training records were also provided to the Commission stating that the Enumclaw gas personnel have been properly trained to tap pipelines under pressure, in compliance with 192.627. Line markers with the current area code and phone number have been observed in the field. Our staff was informed by Enumclaw Gas Department personnel that all line markers are in place and will be maintained via patrols of the gas mains.

The Commission also received your letter dated October 10, 1996, which describes the results of a leak survey on all unprotected service lines. Staff accepts your intent to comply with WAC 480.93.110 and understands that in intending to comply, the City of Enumclaw will leak survey unprotected services twice a year, not to exceed eight months. Until which time the unprotected services are replaced or repaired, occurring no later than December 1, 2005.

Mr. Mark Bauer  
October 23, 1996  
Page 2

Request for waiver of MAOP requirements and WAC 480.93.115 (Casing of Pipelines), has also been received. The Pipeline Safety Staff will continue to work with the City of Enumclaw toward achieving compliance regarding these waivers.

In regard to all previously noted violations, staff finds that compliance has been obtained, or an intent to comply has been shown. Therefore, staff accepts the City of Enumclaw's intent to comply. Compliance will be verified in a future audit of the City's gas program facilities, records and procedures.

Thank you for your time and interest in pipeline safety. Should you have any questions regarding this letter, please direct all responses to Tim Bell, Gas Pipeline Safety Section at the above address or by telephone at, (360) 586-1115.

Sincerely,



Steve McLellan  
Secretary

cc: Don Mosley