



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-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."

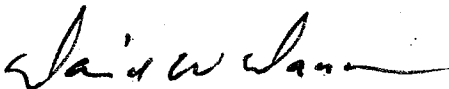
This 2008 inspection was the first standard inspection since December 1, 2005. It determined that Enumclaw did not meet its commitment to commission staff and as of the date of this letter, has still not replaced or repaired all of its unprotected services. This resulted in a probable violation contained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