



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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Ref. No. Docket PG-051609

CERTIFIED MAIL

April 6, 2006

Chris Searcy, P.E.
Public Works Director
City of Enumclaw
1339 Griffin Avenue
Enumclaw, WA 98022

Dear Mr. Searcy:

Subject: 2006 Enumclaw Specialized Inspection

Thank you for your letter of March 8 concerning our (pipeline safety staff) specialized inspection of Enumclaw's natural gas system conducted in January. Your information has helped clear up one of our concerns. However, we believe there are four probable violations which constitute a public safety risk and may justify pursuit of a complaint. Attached is our inspection report.

The inspection included a review of probable violations noted in past standard inspections from 1999, 2000, 2002 and 2004. We also performed a field verification of your Operator Qualification (OQ) program. We found four probable violations of federal and state pipeline safety regulations - two of these violations involve improperly installed regulators and over-pressure protection devices vents which affect Enumclaw's over-pressure protection. We have also listed two areas of concern which may lead to probable violations if the issues are not properly addressed by Enumclaw. These findings illustrate our position based on the January inspection and consideration of your March letter.

As we have discussed previously, your system's historic pattern of probable violations is of great concern to the pipeline safety program. Because Enumclaw relies on personnel who are responsible for a wide range of public works activities, accurate and up-to-date procedures are essential to ensure your staff have the guidance to operate the pipeline in accordance with safety protocols. These regulations have changed significantly over the past several years but they remain only the minimum safety standards (49 CFR 192.1) that apply to gas transportation systems.

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WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2005 Specialized Inspection of the Natural Gas System
City of Enumclaw
Docket PG-051609

Probable Violations

[Note: Violations of CFR noted in this report are violations of Commission rules per WAC 480-93-999]

1. **49 CFR 192.355 (b) (1) 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:

(1) Be rain and insect resistant;

Finding

As part of the OQ field verification, we observed components of Enumclaw's gas system for abnormal operating conditions. At the following locations, we found that Enumclaw has regulator vents in positions which may allow water and other debris to accumulate inside the device. In addition, Enumclaw has not followed the regulator manufacturer's installation instructions and the vents are not rain and insect resistant in accordance with 49 CFR Part 192.355. Water and debris in the regulator may prevent the regulator from operating properly in an over-pressure condition.

436 th and E 208 th Ave SE	436 th and 212 th
22025 436 th Street	20104 436 th Street
22109 436 th Street	45075 244 th Ave SE
21928 436 th Street	45203 244 th Ave SE
23128 436 th Street	

The regulator manufacturer's installation instructions for Equimeter, Fisher, Rockwell, and Sprague regulators state that the regulator be installed so that the regulator vent faces downward or is otherwise protected to avoid the potential for water or other foreign matter entering the regulator and interfering with the proper operations of the regulator.

This is a repeat probable violation from Docket No. UG-000071.

3. **49 CFR 192.605 (b)(1) Procedural manual for operations, maintenance, and emergencies**

Each operator shall include the following in its operating and maintenance plan:

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and Subpart M of this part.

Finding

Enumclaw's O&M manual contained inadequate procedures, lack of procedures, or procedures that simply parroted 49 CFR Part 192 rules. We reviewed Enumclaw's procedures and found that they were inadequate or not specific to Enumclaw's system.

An example is found in the O&M manual Section 4.08F. This section does not state what the Lower Explosive Level (LEL) is for Enumclaw's gas. 49 CFR Part 192.625 (f) requires gas to contain an odorant at a concentration in air of one-fifth of the LEL, the gas is readily detectable by a person with a normal sense of smell. Natural gas is considered to have a LEL of 4 or 5 percent concentration of gas in air. The LEL is dependent on the percentages of the various constituents in the gas. The percentage of gas in air will determine the correct instrument read. Enumclaw cannot determine the correct instrument read as required by 49 CFR Part 192.625 (f).

A second example is found in Manual Section 3.21 C. e. 3. This section states that the line operating pressure shall be reduced so that a stress level of 20% of SMYS will not be exceeded while the full encirclement split sleeve is being applied. Enumclaw operates at less than 20% SMYS; therefore, this procedure is not applicable to Enumclaw's gas system.

This is a repeat probable violation from Docket Nos. UG-000071, UG-990605 and PG-021283.

4. **49 CFR 192.805 (b) Qualification program.**

Each operator shall have and follow a written qualification program. The program shall include provisions to: . . .

(b) Ensure through evaluation that individuals performing covered tasks are qualified;

Finding (a)

Enumclaw's employees, except for the new employee in training, have been evaluated and qualified by Local 32 for all operator qualification covered tasks. During the inspection, we requested to perform an OQ regulator relief device test on Local 32 evaluated and qualified Enumclaw employees. Two of Enumclaw's employees demonstrated that they were qualified. Enumclaw did not allow the

Areas of Concern

- 1) On October 25, 2004, the WUTC sent an advisory bulletin to all regulated gas pipeline companies in the State of Washington, including Enumclaw. The advisory bulletin recommended several actions be taken. We expect that when an advisory bulletin is issued that operators implement the recommended actions. However, as of the date of the inspection, January 11-13, 2006, Enumclaw had not yet made the recommended changes to its plans and procedures and had not taken the safety precaution of marking the positive and negative leads inside each rectifier.

- 2) The Public Works Operations Manager is responsible for the Water, Sewer, Street, Garbage and Gas departments; this includes managing the daily operations of all these departments. For the Gas Department, there does not appear to be adequate time to review and remain current with 49 CFR Part 192, WACs, Washington state and OPS Advisory Bulletins, or adequate time to update and/or write Enumclaw natural gas specific procedures for the O&M manual. One example of this is the O&M procedures. After two years of working with natural gas operators, on June 5, 2005, the updated WAC 480-93 became effective. WAC 480-93-180 requires "The manual must include plans and procedures for all requirements of 49 CFR Part 192 and chapter 480-93 WAC, and any plans or procedures used by an operator's associated contractors." The City of Enumclaw was unaware of WAC 480-93 rules and the 2004 Washington State Advisory Bulletin.

During the field portion of this specialized inspection, we noted that personnel appear to be qualified and knowledgeable. However, without adequate written procedures, Enumclaw could not demonstrate compliance. We also noted that full time Enumclaw natural gas employees are often required to assist with other city utilities.