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WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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Ref. No. Docket PG-051609

CERTIFIED MAIL

May 17, 2006

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

Dear Mr. Searcy:

Subject: 2006 City of Enumclaw Specialized Inspection

We have completed our review of the revised operations and maintenance procedures provided by the City of Enumclaw (Enumclaw), as a result of the January 2006 follow-up inspection.

Enclosed is our report containing the results of the review. We identify 10 areas where Enumclaw's procedures still lack sufficient detail, and in certain cases, are not applicable to Enumclaw's gas distribution system. The report also lists other procedures which have not yet been received. The commission will determine the appropriate enforcement action to take, if any, regarding these matters.

This was not a complete review of Enumclaw's manual. A comprehensive review will be included in our standard inspection planned for later this year.

Please contact Patti Johnson at (360) 664-1266 if you have any further questions. Refer to docket number PG-051609 in any future correspondence regarding this inspection.

Sincerely,

Alan E. Rathbun
Pipeline Safety Director

cc: Jim Flisrand

Enclosure

Handwritten initials: RDS

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2006 Natural Gas Specialized Inspection Report
City of Enumclaw
Docket No. PG-051609

The following deficiencies were found, based on our review of the revised operations and maintenance (O&M) procedures manual provided by the City of Enumclaw, as a result of the Commission's January 2006 follow-up inspection. References to "Section" below refer to the sections identified in Enumclaw's O&M manual.

Item 1

Section 3.21.e.3 states "Line operating pressure shall be reduced so that a stress level of 20 percent of the specified minimum yield strength of the pipe will not be exceeded."

Findings:

Enumclaw does not have pipelines that operate above 20 percent of the specified minimum yield strength. Therefore, this is an unnecessary step in the procedure. This is an example that supports our concern that Enumclaw's personnel may lack an in-depth understanding of Enumclaw's natural gas system.

Item 2

Section 4.08, entitled "Odorization," combines a discussion of industry standards for odorant injected into the pipeline system and sniff test concentrations of gas in air requirements.

The O&M manual also states a sniff test will be conducted and lists the locations where the sniff tests will be conducted.

Findings:

Section 4.08 lacks a detailed, system-specific procedure for determining adequate odorant levels and for conducting a proper sniff test.

Item 3

Section 4.09, entitled "Remedial Action," explains that remedial actions are to be taken when there is pipe wall loss.

Findings:

The manual lacks a procedure for determining the amount of wall loss. In addition, there are no specific remedial actions identified that are to be taken when specific wall loss conditions are determined.

Item 4

Section 4.09, entitled "Examination of Excavated Pipelines," includes 49 CFR §192.459 requirements only.

Findings:

There is no procedure for documenting the condition of metallic facilities each time they are exposed as required by WAC 480-93-110(6).

Item 5

Section 4.09, entitled "Casings Inspection," states there are 10 casings throughout Enumclaw's natural gas system. Enumclaw's O&M manual states "The procedures for each location are identified in detail on Form 21A located at the back of this O&M manual."

Findings:

Form 21A only has 9 casing locations listed.

Item 6

Section 4.09, entitled "Atmospheric Corrosion," procedure revised on 1/10/06, includes a provision for scheduling repair of significant atmospheric corrosion.

Findings:

The procedure does not include the following:

- Provisions for determining the difference between minor atmospheric corrosion and significant atmospheric corrosion .
- Procedures for measuring pit depths.
- Procedures for conducting inspection on meterless risers.
- Procedures for conducting inspections on hard to access meters.

Item 7

Section 5.05, entitled "Valve Maintenance," was updated. However, Section 5.05 B. 1. b. states deficiencies found during maintenance will be corrected by repair or replacement.

Findings:

There did not appear to be criteria developed for determining when a valve is to be repaired versus replaced.

Item 8

Section 3.12, entitled "Repair of Plastic Pipe," states cuts, gouges, kinks, or scrapes deeper than 10 percent of the wall thickness must be removed. The section does not include specifications for:

- Determining the amount of wall loss on plastic pipe; or
- Noting the 10% threshold for wall loss on each of the various size plastic pipe used in Enumclaw's gas system.

Item 9

Section 3.21.C.2.e, Enumclaw combined two procedures into one. A full encirclement welded split sleeve repair does not require tapping the pipe.

Findings:

This is not an adequate procedure.

Item 10

Section 4.03, entitled "Maximum Allowable Operating Pressure," (MAOP) discusses raising the MAOP of the transmission above 250 psig.

Findings:

This is a misleading section. Enumclaw is operating the transmission line at 250 psig because the commission issued a waiver in Docket UG-960732, and allowed it to be operated at that pressure. Subsequent pressure increases require the approval from the commission.

Outstanding issues:

Several procedures that Enumclaw was to review and update were not found in the packet of updated procedures Enumclaw sent to the commission. Comments below are based on the most current revisions reviewed during the January 2006 follow-up inspection.

Item A

Section 3.03 F was last updated 12/99. It stated that emergency rescue equipment including breathing apparatus would be available at all trench construction areas that may be a safety concern in accordance with 49 CFR §192.605(9).

Comment:

Enumclaw's process has changed since 1999. Enumclaw currently relies on the fire department to provide breathing apparatus if it was needed.

Item B

Section 8 "Investigation of Failures" does not include provisions as outlined under (49 CFR §192.615(10)), for beginning failure analysis as soon as possible after an emergency as required under 49 CFR §192.617.

Comment:

Section 8, "Failure Investigation" does not have sufficient procedures for conducting investigations, including the selection and collecting of samples of failed pipe or other system components for laboratory examination.

Item C

Section 4 refers directly and indirectly to taking pipe-to-soil cathodic protection readings.

Comment:

There did not appear to be a procedure set forth for conducting these types of readings.