



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
Docket: UG-960732

November 15, 1996

Mr. Richard B. Felder
Associate Administrator For Pipeline Safety, DPS-1
RSPA Office of Pipeline Safety
400 Seventh Street SW
Washington, DC 20590-0001

Dear Mr. Felder:

Subject: Waiver of 192.619(a) MAOP Requirements

On November 13, 1996, the Washington Utilities and Transportation Commission (Commission) approved a waiver under docket UG-960732 for the Maximum Allowable Operating Pressure (MAOP) requirements for portions of pipeline systems operated by The City of Enumclaw, a Washington State municipality (2041 Railroad Street, Enumclaw, Washington, 98022-3091, contact Don Mosley, (360) 825-5541).

Pursuant to the Federal-State partnership, the waiver for CFR 49, Part 192.619(a) will become effective January 27, 1997, subject to your approval. The Commission order granting the waiver to the City of Enumclaw is enclosed.

Commission Pipeline Safety Staff believe the waiver from CFR 49, Part 192.619(a) is appropriate and not detrimental to public safety. The pipeline systems have operated at the requested MAOP pressures for twenty years. The City of Enumclaw is a town of 10,000 people that is predominantly a class three location within the city limits and class two location in the county.

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The waiver will bring into compliance a probable violation that has been identified during pipeline safety audits for the past three years. The Gas Department Utility Manager has researched records to try and find documentation for operating pressures during the 1965-1970 window to provide MAOP documentation with no results. Compliance to the MAOP probable violation can only otherwise be obtained by shutting down the City and pressure testing the pipelines.

If you have any questions concerning this waiver, please contact Dennis Lloyd, Pipeline Safety Manager at (360) 586-0594 or Tim Bell, Utilities Engineer at (360) 586-1115.

Sincerely,



Steve McLellan
Secretary

Enclosures

cc: Edward J. Ondak, P.E.

SERVICE DATE
NOV 13 1996

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Request by)
THE CITY OF ENUMCLAW for a Waiver) DOCKET UG-960732
to Establish Maximum Allowable)
Operating Pressures for pipelines) ORDER GRANTING
installed prior to 1978.) WAIVER
[CFR 49 Part 192 Section 619(a)])
.)

On July 30, 1996, The City of Enumclaw, a Washington Municipality, filed a request for a waiver of 49 CFR Part 192 Section 619(a), Maximum Allowable Operating Pressure (MAOP) requirements. The City of Enumclaw does not have documentation of pressure testing or records of the highest operating pressure for pipelines installed prior to 1978. It is impossible for The City of Enumclaw to produce records that have been lost. The waiver is to allow the City of Enumclaw to operate the gas systems at current operating pressures and set the Maximum Allowable Operating Pressure for the City's high pressure distribution main at 250 psig and 40 psig for the city's intermediate pressure distribution systems.

FINDING OF FACT

1. The City of Enumclaw has successfully operated its high pressure distribution main at 250 psig and its intermediate pressure system at 40 psig since before October of 1977 with no adverse affects to public safety.
2. The latest leak survey on the 14 mile high pressure distribution main, conducted in June, 1996, showed no leaks.
3. All pipe installed and/or replaced since 1978 has documentation of established MAOPs.
4. Establishing MAOPs via pressure testing as required by the safety code would require the shutdown of the entire City of Enumclaw.
5. Uprating the systems would put an undue burden on the City and unnecessary expense; records of leak surveys for the past three years have been provided at the current operating pressures.

O R D E R

1. WHEREFORE, IT IS HEREBY ORDERED that the request by The City of Enumclaw for a waiver of the requirements of CFR 49 Part 192 Section 619(a) be granted to allow the City of Enumclaw to operate their gas systems at current operating pressures and set the Maximum Allowable Operating Pressures at 250 psig for the City's high pressure distribution main and at 40 psig for the City's intermediate pressure systems.

2. IT IS FURTHER ORDERED, that this waiver for MAOP requirements applies only to those portions of the high pressure distribution main and the intermediate pressure systems installed prior to 1978

3. IT IS FURTHER ORDERED That jurisdiction over this Docket is retained to effectuate the provisions of this order.

DATED at Olympia, Washington, this 13th day of November, 1996, and effective January 27, 1997.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION



STEVE MCLELLAN, Secretary