



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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Ref. No. Docket PG-080097

CERTIFIED MAIL

January 8, 2010

The Honorable Liz Reynolds
Mayor, City of Enumclaw
1339 Griffin Avenue
Enumclaw, Washington 98022

Dear Mayor Reynolds:

RE: 2008 City of Enumclaw Settlement

This letter is in response to the Quarterly Report filed by the City of Enumclaw in Docket PG-080097 describing the status of compliance with terms of the Settlement Agreement (Agreement) approved by the Utilities and Transportation Commission (commission) on September 25, 2009, and in accordance with that Agreement.

Commission Staff (staff) conducted a follow up inspection regarding compliance with the Settlement Agreement. Staff has reviewed Enumclaw's Quarterly Report. In addition, staff and the City of Enumclaw met on January 7, 2010 to discuss the City's compliance progress.

Enumclaw's remediation of probable violations noted in the June 2008 standard inspection, and its significant efforts towards compliance with terms of the Settlement Agreement well in advance of its final approval by the commission has enabled it to complete a majority of the Agreement's specific conditions, within the required timeframes.

Staff's review finds that Enumclaw has thus far met all general conditions found in paragraphs 10 through 19 of the Agreement. This includes paragraph 19's specific requirement to provide training for all O&M revisions, documentation of training, and records of implementation.

Staff's review indicates that Enumclaw has made significant progress towards completing the requirements set forth in Paragraphs 20 and 21 of the Agreement. The 141 unprotected services must be replaced by September 25, 2011. As of November 24, 2009, Enumclaw had replaced 78 services, with a total of 63 services remaining. Of those remaining to be replaced, 25 are among the 47 bonded services described in paragraph 21.



Staff's review of compliance with the Agreement to date finds that, to date Enumclaw has complied with each requirement found in paragraphs 22-60 of the Agreement. The status of compliance with each paragraph is addressed below.

- Paragraph 22: Enumclaw has developed a written program to assess the condition of the protective coating on the 47 services identified in paragraph 21 of the settlement agreement. The ACVG procedure was added to Manual 2 Appendix 2-O-6.
- Paragraph 23: Enumclaw has completed a protective coating assessment of the bonded services.
- Paragraph 24: The twice annual leak surveys have been conducted continually since 1995. The most recent having been completed on March 10, 2009 and September 21, 2009. Staff will continue to monitor compliance with this paragraph until all unprotected services are replaced.
- Paragraph 25: Enumclaw completed a cathodic protection survey as described in Enumclaw's O&M Manual 2 Procedure O Section 5 as required and did not find additional unprotected services. In addition, during the 2009 (the first three year cycle of) atmospheric corrosion inspections, Enumclaw conducted pipe-to-soil reads on every steel service. Enumclaw plans on taking pipe-to-soil reads on every steel service in the 2010 and 2011 atmospheric corrosion inspections. During the 2009 atmospheric corrosion inspection, no additional unprotected services were found.
- Paragraph 26: Enumclaw completed a method to document and record the location of insulated fittings where a cathodic protection test point or bond has been installed with procedures titled Typical Cathodic Protection Test Stations by Type (Manual 4, Procedure N and Appendix 4N4; Test Stations, Test Leads and Bonds (Manual 4, Procedure N, Section 6); the Work Order used; the Service Order Record, Manual 1 Procedure K Section 8 and associated drawings in Appendix 4-N-4. Staff has reviewed and approved this procedure prior to implementation.
- Paragraph 27: Enumclaw has completed remedial action within 90 days to correct all cathodic protection deficiencies known. All remedial action is recorded on the Remedial Action form and is also kept electronically (scanned) in the MAPCON Maintenance System.

- Paragraph 28: Enumclaw has documented all cathodic protection remedial action on the appropriate MAPCON System Work Orders and completed the use of all associated O&M procedures and documentation. Along with a review of system work orders, staff also reviewed other associated documentation i.e., Service Orders, Leak Repair Reports, and Exposed Pipe Reports.
- Paragraph 29: Enumclaw has revised its O&M and identified regulators servicing mains with two or more services (excluding branch services) as regulating stations. Enumclaw has chosen to comply with item (a) with plans to pursue item (b) in the future. On October 8, 2009, staff reviewed all 2009 Regulator Station Reports and Emergency Operations Zone maps showing all valves. The Emergency Operations Zone Maps are an electronic system. The system is a map of Enumclaw's backbone system with the regulator stations, the system has layers. One of the layers is a complete schematic of each district regulator station. This information is on all trucks in a section of the maps.
- Paragraph 30: On October 7, 2009, staff reviewed all 2009 Regulator Station Inspection Reports. Currently, Enumclaw has 24 District Regulator Station including the farm taps turned district regulator.
- Paragraph 31: Enumclaw identified every known casing installed on its gas system. In addition to investigating the casings listed in the Probable Violation Report, Enumclaw reviewed 4000 service cards and identified 4 casings that were not in the Probable Violation Report. Enumclaw's MAPCON maintenance system currently has 33 casings on their annual inspection for electrical isolation. Enumclaw has reviewed construction records and performed 4 direct assessments to substantiate past construction practices of installing bare steel casings. Enumclaw found that when a county permit was applied for, a standard clause requesting a casing was always requested. When a job was complete, even if a casing was not used, the county approved casing was shown on the map.
- Paragraph 32: Enumclaw did not identify any casings constructed of coated steel or plastic materials and found no pipe defects. Staff reviewed all casing documentation.
- Paragraph 33: Enumclaw has updated their maps with correct casing information. On October 17, 2009, staff reviewed all 33 casings on the maps. In addition, Enumclaw is going through all service cards and main extensions and verifying map accuracy.
- Paragraph 34: Enumclaw conducted a pressure test of each service or main installed downstream of a farm tap regulator to increase the MAOP. The MAOP of Enumclaw's

system is 40 psi and was established by waiver. While complying with this requirement, Enumclaw planned for a future uprate and established 60 psi as the MAOP for each service or main installed downstream of farm taps.

- Paragraph 35: Enumclaw had purchased and was using a MAPCON Maintenance Management and document storage system before the Settlement Agreement was filed with the commission. All gas work is scanned into this system and the field hard copy is filed in the gas office. This system has a Pipeline Safety Compliance Calendar and notifies the manager of upcoming annual compliance requirements. Every form Enumclaw uses is in the O&M and cross referenced to the procedures used to complete the form.
- Paragraph 36: Enumclaw is updating its records and maps within six months of construction and compliance activities. To ensure updated records are available to appropriate personnel, the maps on the trucks are replaced every six months. In addition, every truck has an O&M manual and every employee has access to the gas bay computer.
- Paragraph 37: Enumclaw takes appropriate measurements every time a mapping discrepancy is found. The discrepancies are red lined on the maps in the Enumclaw Gas Bay. Since all the maps are in the process of being compared to records and updated, the locate mapping discrepancy will not be sent to the mapping personal until all maps have been reviewed and updated. At that time, the mapping discrepancies will be compared to the maps to determine the map update accuracy. On October 6, 2009, staff reviewed 18 locate tickets with corrected dimension and the associated O&M procedures.
- Paragraph 38: Enumclaw conducted their 2009 Leak Surveys with updated maps. The High Pressure Leak Survey Maps reviewed had a revision date of May 29, 2009.
- Paragraph 39: Enumclaw corrected all missing map information noted in Probable Violation 15 of the Probable Violation Report. To ensure mapping is done, mapping personal sign and date the appropriate boxes on the Service Order form, indicating both the hard copy maps and the electronic maps have been updated. This procedure is found in Appendix 1-P-4. As mentioned above, Enumclaw is reviewing and updating all maps.
- Paragraph 40: Enumclaw conducted all 2009 leak surveys over all mains and services. The Leak survey maps reviewed had main and service dimensions and leak survey information properly indicated. Leak Survey maps are updated first.

- Paragraph 41: Enumclaw's Can't Gain Access Procedure is found in O&M Manual 1 Procedure K Section 6. The first step in the procedure is to leave a door hanger; the last step uses local police to gain access. On July 27, 2009, staff reviewed duplicates of 49 door knockers.
- Paragraph 42: Enumclaw wrote detailed procedures for conducting self audits including methods to evaluate the information. This procedure is found in O&M Manual 2 Procedure 7 and Manual 2 Procedure 8.
- Paragraph 43: Enumclaw construction form titled Pipeline Test Report, documents all pressure test information including the requirements found in WAC 480-93-170 (7) (a)-(h). On July 27,-2009, staff reviewed the 84 pressure tests conducted to date in 2009.
- Paragraph 44: Enumclaw maps now include the location of all cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system in accordance with 49 CFR §192.491.
- Paragraph 45: Enumclaw's O&M Appendix 2-P-1 is the Leak Repair Report. This report contains all 13 elements found in WAC 480-93-187 (1)-(13). Each Leak Repair Report is given a work order number and the completed copy is scanned into the MAPCON system.
- Paragraph 46: Enumclaw's Gas Leak and Repair form has adequate space to accommodate a detailed drawing of the leak site including the magnitude and location of a leak. The form and procedure are found in Appendix 2-P-1.
- Paragraph 47: Enumclaw's Gas Leak and Repair form notes whether or not a 30 day follow up inspection is required and if required the date completed.
- Paragraph 48: Enumclaw completed a 100% atmospheric corrosion inspection of its system by December 31, 2008 and began its next three-year cycle on January 1, 2009. In addition, during the cycle starting in 2009, Enumclaw is taking a pipe-to-soil read at every steel service to ensure they have identified all unprotected services.
- Paragraph 49: In the atmospheric corrosion three year cycle ending December 2008, Enumclaw found and remediated 19 sites. The atmospheric corrosion cycle starting January 2009 is conducted on a form titled Atmospheric corrosion Control Form and it includes the date, condition found, inspection date, idle risers, farm tap or service, meter

number, riser type, conditions found, corrective actions taken, date repaired, by whom and the grade left after remediation. All atmospheric corrosion records are scanned into MAPCON.

- Paragraph 50: Enumclaw has written detailed procedures for every O&M item listed in Probable Violation 1 in the Probable Violation Report.
- Paragraph 51: Staff conducted an O&M inspection using Pipeline's Plan and Procedures Inspection form. Staff would like to note that an O&M is a living document and that Enumclaw is frequently making changes to improve the O&M.
- Paragraph 52: Enumclaw has a detailed procedure for crews to communicate to management any abnormal operating conditions and/or unrelated work they find while performing other duties. Staff reviewed Manual 1 Procedure M and the associated form in Appendix 1-M-1. This form initiates an investigation of the specific situation, piece of equipment or safety related condition. The investigation's result determines what action to take or work to schedule.
- Paragraph 53: Enumclaw has reviewed and updated its atmospheric corrosion program to include Enumclaw specific procedures and process, i.e. accessibility issues. January 2009 was the start of a three-year atmospheric corrosion cycle; staff reviewed Enumclaw's 2009 atmospheric corrosion inspection.
- Paragraph 54: Enumclaw has developed an acceptable gas safety Quality Control/Quality Assurance plan.
- Paragraph 55: Enumclaw has included RCW 19.122's definition of damage in its O&M Manual.
- Paragraph 56: Enumclaw has included guidelines for filling out all commission and federal reports in O&M Manual 1 Procedure G and Appendix 1-G-2.
- Paragraph 57: Enumclaw remains required to join and participate in the State of Washington's Virtual DIRT (Damage Information Reporting Tool) when it becomes operational.
- Paragraph 58: Enumclaw O&M includes sufficient detail and Enumclaw specific procedures addressing the measuring of cathodic protection levels anytime a pipeline

facility is exposed and the protective coating removed. This procedure is found in O&M Manual 2 Procedure O Section 5.2 and Appendix 2-O-5.


- Paragraph 59: Staff conducted an Operator Qualification inspection using PHMSA's Headquarters Operator Qualification Inspection form.
- Paragraph 60: Enumclaw has included a procedure to handle foreign leaks in the O&M Manual 2 Procedure P Section 4.4 and Appendix 3-B-2.

This letter reflects the opinions and conclusions of commission staff, and does not necessarily reflect the position or conclusions of the commission, should it be called upon to decide these issues in a future proceeding.

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 D. Lykken
Director, Pipeline Safety

cc: Chris Searcy, City of Enumclaw
Ed Hawthorne, City of Enumclaw