

CERTIFIED MAIL

December 10, 2004

John Blanus, Mayor
City of Buckley
933 Main Street
PO Box 1960
Buckley, Washington 98321

Dear Mr. Blanus:

Subject: City of Buckley Standard Natural Gas Safety Inspection

Commission pipeline safety staff (Staff) completed an on-site inspection of the City of Buckley's (Buckley) natural gas distribution system during the week of September 27, 2004. Enclosed is Staff's report showing no areas of non-compliance with state or federal pipeline safety codes. The report does note eight areas of concern or recommendations which if not addressed could result in non-compliance with state or federal pipeline safety codes. The inspection included a review of safety and emergency procedures, operation and maintenance records for the past two years, and a field inspection of the gas distribution system including regulator stations, the section of main effected by soil erosion, and a leak survey of the business district.

Staff also investigated the probable cause of low pressure to Buckley's pipeline system on January 5, 2004, and has provided Buckley with a Williams Pipeline contact for future use. Two safety related conditions were identified during the past year, which Buckley gas department staff recognized and responded to in a timely manner.

City of Buckley
Docket No. PG-041731
December 10, 2004
Page 2

It is not to be assumed that this inspection detected all areas of non-compliance. It is incumbent upon City of Buckley to review their operation and determine whether there are other areas of con-compliance.

Please review the attached report and respond in writing by January 11, 2005. If you have any questions or if Staff may be on any assistance, please contact Al Jones at (360) 664-1321.

Thank you for your cooperation and interest in pipeline safety.

Sincerely,

Alan E. Rathbun
Pipeline Safety Director

cc: Dave Schmidt, City of Buckley
Bob Butcher, City of Buckley

The Washington Utilities and Transportation Commission (Commission) has the authority to enforce the minimum safety regulations per Chapter 480-93 of the Washington Administrative Code (WAC) pertaining to the construction, maintenance and operation of pipelines transporting natural gas in the state of Washington. In addition, the Commission adopts the Code of Federal Regulations (CFR) Title 49, Part 191 and 192.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2004 Natural Gas Standard Inspection Report
City of Buckley
Docket PG-041731

AREAS OF CONCERN / RECOMMENDATION

1. Staff found that the operations and procedures manual met the minimum requirements of the federal and state codes, however the manual lacks detailed procedures that are unique to the City of Buckley's (Buckley) gas system. As an example:
 - a) A new welding procedure, currently being reviewed by Cascade Natural Gas needs to be completed before the procedure can be used on the system.
 - b) The Operation & Maintenance (O&M) manuals were recently revised by a third party contractor and currently under review. The Commission's incident notification telephone number needs to be updated to: 1-888-321-9146.
 - c) Buckley needs to document in their O&M Manual how the "instant off" is read for their type of electronic meter when taking pipe-to-soil readings on the Cathodic Protection system. Some meters capture the value or use the initial or second value.
2. The distribution system maps were recently converted to a CAD system. Tie-in piping and regulator station plans for Rainier School, and all Class II and III locations were omitted from the maps. These details should be included in a revised map.
3. The maximum allowable operating pressure for mains, service lines, and regulator stations were established at the time of construction by pressure testing. These documents are not readily available and appear to be stored in Buckley's archives. It is recommended that these documents be located and retained in a single location for Staff's review.
4. Staff found approximately twelve gas leaks within a two-block area of the business district. All of the leaks were minor in nature and located on meter sets. Many of the meter sets are located in areas that are difficult to inspect for leaks. Staff encourages Buckley to review the adequacy of their combustible gas indicator equipment for locating gas leaks on meter sets. All leaks need to be identified and repaired.
5. The downstream pressure gauge used at the Rainier School regulator station needs to be updated to measure the actual pressure. The current gauge has a small diameter face with a high scale range where the low end of the scale is used with poor accuracy. A larger diameter gauge and using middle range of the scale is recommended to increase accuracy in setting the downstream and overpressure protection pressures to the customer.

6. The City of Buckley has a contractor to monitor the gas odorant levels. The odorant results are provided to Buckley in a format that cannot be easily reviewed, including: (a) the make, model, and serial number of equipment used to test the odorant levels, (b) the numeric readings for odorant levels are values with no specified units, and (c) the forms need to be signed/dated by both the contractor and the person responsible for reviewing the data at the City of Buckley. How are low odorant values identified? It is incumbent upon the operator to determine if the odorant levels are in compliance, not the contractor.
7. It is recommended that the pressure hoses used to calibrate the regulator equipment be tested annually and documented. It is for personnel safety that these hoses and fittings are in good working condition.
8. The following areas should be monitored during the winter months for to prevent future potential safety related conditions:
 - a) Lake Tapps flume. The flume flooded during freezing weather conditions that caused soil erosion and exposed the gas pipeline. Increased patrolling during the winter months along the section of pipeline that is parallel to the flume is recommended. Also, Buckley needs to establish a contact person at Puget Sound Energy for notification to mitigate any future flooding.
 - b) Low-pressure alarm. Buckley was alerted on January 5, 2004 to a low-pressure condition on its supply main. Williams Pipeline corrected the low pressure at the transmission lateral to the Cities of Buckley and Enumclaw. Recently, Williams announced the replacement of the 26-inch diameter transmission pipeline with a new 36-inch diameter pipeline. The possibility of future low pressure resulting from construction activity need to be mitigated by notifying the Williams' Redmond District Office when Buckley's low pressure alarm is activated.