



STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

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*Sent Via Email and FedEx*

November 23, 2020

John Akers  
City Manager  
City of Ellensburg Natural Gas Department  
501 North Anderson Street  
Ellensburg, WA 98926

**RE: 2020 Natural Gas Standard Inspection – City of Ellensburg – Gas Department –  
(Insp. No. 8066)**

Dear Mr. Akers:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Standard Inspection of City of Ellensburg (Ellensburg), as Department from October 27, 2020 to October 29, 2020. This inspection included a records review and inspection of pipeline facilities.

Our inspection indicates one area of concern as noted in the enclosed report, which unless corrected, could potentially lead to future violation of state and/or federal pipeline safety rules.

**Your response needed**

Please review the attached report and respond in writing by December 25, 2020. The response should include how and when you plan to bring the area of concern into full compliance.

**What happens after you respond to this letter?**

The attached report presents staff's decision on the area of concern and does not constitute a finding of violation by the commission at this time.

After you respond in writing to this letter, there are several possible actions the commission, in its discretion, may take with respect to this matter. For example, the commission may:

- Issue an administrative penalty under RCW 81.04.405; or
- Issue a complaint under RCW 81.88.040, seeking monetary penalties, changes in the company's practices, or other relief authorized by law, and justified by the circumstances. Any pipeline company that violates any pipeline safety provision of any commission order, or any rule in this chapter including those rules adopted by reference, or chapter

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81.88 RCW is subject to a civil penalty not to exceed \$213,268 for each violation for each day that the violation persists. The maximum civil penalty for a related series of violations is \$2,132,679; or

- Consider the matter resolved without further commission action.

If you have any questions or if we may be of any assistance, please contact Derek Norwood at (360) 259-2525. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

Sean C. Mayo  
Pipeline Safety Director

Enclosure

cc: Darin Yusi, Gas Engineer, City of Ellensburg  
Darren Larsen, Assistant Utilities Director, City of Ellensburg  
Ryan Lyyski, Public Works and Utilities Director, City of Ellensburg

**UTILITIES AND TRANSPORTATION COMMISSION**  
**2020 Natural Gas Pipeline Safety Inspection**  
**City of Ellensburg – Gas Department**

The following area of concern of Title 49 CFR Part 192 was noted as a result of the 2020 inspection of the City of Ellensburg – Gas Department. The inspection included a random selection of records, operation and maintenance (O&M), emergency response, inventory, and field inspection of the pipeline facilities.

**AREA OF CONCERN**

1. **49 CFR §192.739(a) Pressure limiting and regulating stations: Inspection and testing.**

*(a) Each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year*

**Finding(s):**

Northwest Pipeline (Williams) owns the gate station and pressure relief valve that control the pressure and protect parts of Ellensburg's system from over pressurization. During the inspection, Ellensburg was able to obtain maintenance records for these facilities, but they do not have a procedure in place to obtain these records annually. Since the facilities have annual maintenance requirements, common practice for local distribution operators is to request the records annually.