

# Form C 8599

UTC Standard Inspection Report  
 Intrastate Gas Distribution  
 R C - State Statutes and Rules  
 Records Review and Field Inspections

## Inspector and Operator Information

<b>Inspection Link</b> 8599	<b>Inspector - Lead</b> Cullom, David	<b>Inspector - Assist</b>
<b>Operator</b> Enumclaw	<b>Unit</b> City of Enumclaw	<b>Records Location - City &amp; State</b> Enumclaw, Wa
<b>Inspection Start Date</b> 06-13-2023	<b>Inspection Exit Interview Date</b> 06-16-2023	<b>Engineer Submit Date</b>

### Inspection Summary

This was a standard natural gas distribution inspection for the City of Enumclaw that had 4 AFODs. It consisted of a records, some procedures, and a field review of gas system assets. The operator's GIS has been advancing in capabilities and expedited the records review.

There were no AOCs, or probable violations. Participants included Nick Pello and AJ Haas. This inspection was performed at the Public Works Operations (Shops) located at: 2041 Railroad St. Enumclaw, WA 98022

## Instructions and Ratings Definitions

### INSTRUCTIONS

S - Satisfactory

U - Unsatisfactory

Area Of Concern

N/A - Not Applicable (does not apply in this inspection)

N/C - Not Checked/Evaluated (was not inspected during this inspection)

Unanswered Questions  
0

### INSPECTION RESULTS

Satisfactory Responses  
4

Unsatisfactory Responses  
0

Area of Concern Responses  
0

Not Applicable Responses  
4

Not Checked / Evaluated Responses  
0

Unanswered Questions List

Satisfactory List  
4,6,7,8,

Unsatisfactory List

Area of Concern List

Not Applicable List  
1,2,3,5,

Not Checked / Evaluated List

\*\*If an item is marked Form a- annual review. U, N/Form a- annual review or N/C, an explanation must be included in this report.

## Records, Procedures and Reports

### Question #1.

Do records indicate that the operator appropriately addresses discovered mapping errors, including all mapping errors that have resulted in excavation damage?

**Statutory Reference**  
WAC 480-93-018

**1. Result**  
Not Applicable

**Q1. Within Scope of this Inspection:**  
No such event occurred, or condition existed.

**1. Notes**  
Section 2-G-5 (b) (1) procedure discusses this, but it has not occurred.

### Question #2.

Do records indicate that the operator's mapping corrections are made in a timely manner and in accordance with the operator's written procedures?

<b>Statutory Reference</b> WAC 480-93-018	<b>2. Result</b> Not Applicable	<b>Q2. Within Scope of this Inspection:</b> No such event occurred, or condition existed.	<b>2. Notes</b> This is the same procedure as question 1 (Section 2-G-5 (b) (1) ) and it discusses workflow.
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**Question #3**

Do records indicate that the operator has and follows a quality assurance program for monitoring the locating and marking of facilities? Do records show that the operator conducts regular field audits of the performance of locators/contractors and takes action when necessary?

<b>Reference:</b>  <b>Operator Internal Performance Measures; PHMSA State Program Guidelines</b>	<b>3. Results</b> Satisfactory	<b>3. Notes</b> Enumclaw performs its own locates and the locator is qualified under that MEA task. Elizabeth Jibson is the locator. Performance audits of locates are done by Mark
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**Question #4.**

Does operator include performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?

<b>Statutory Reference</b> WAC 480-93-007	<b>Statutory Reference</b> WAC 480-93-013	<b>Reference:</b> <b>PHMSA State Program Guidelines</b>	<b>4. Result</b> Not Applicable	<b>Q4. Within Scope of this Inspection:</b> No such event occurred, or condition existed.	<b>4. Notes</b> Locates performed in house
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**Question #5.**

Do operator contracted (or organic) locators address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?

<b>Statutory Reference</b> WAC 480-93-007	<b>Statutory Reference</b> WAC 480-93-013	<b>5. Result</b> Satisfactory	<b>5. Notes</b> This is contained within the OQ Plan
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**Question #6.**

Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?

<b>Statutory Reference</b> WAC 480-93-007	<b>Statutory Reference</b> WAC 480-93-013	<b>6. Result</b> Satisfactory	<b>6. Notes</b> The operator reviews its OQ plan each year. It uses MEA as well.
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**Question #7.**

Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements?

<b>Statutory Reference</b> WAC 480-93-007	<b>Statutory Reference</b> WAC 480-93-013	<b>7. Result</b> Satisfactory	<b>7. Notes</b> Yes they are. An OQ Program review was also conducted and there were no issues. The MEA task for locating is MEA 1143, 1420, and 137.
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**Question #8.**

Do records indicate that the operator has and follows a procedure for leaks caused by excavation damage near buildings such that the procedure adequately addresses the possibility of multiple leaks and underground migration of gas into nearby buildings/structures?

<b>Reference:</b>  <b>PHMSA State Program Guidelines Operator Internal Performance Measures</b>	<b>8. Result</b> Satisfactory	<b>8. Notes</b> Gas detected near a building was in O&M Section 2D 5.2.3 (Action criteria)
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**Reference:**

**PHMSA State Program Guidelines  
Operator Internal Performance  
Measures**

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▼ **Comments - Records, Procedures & Reports**

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**RECORDS REVIEW SUMMARY:** Comments are required for any rating other than "Satisfactory". Summarize the "Notes" blocks above, and ensure you annotate the question number for each comment.

▼ **FIELD INSPECTION OBSERVATIONS**

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▼ **Comments - Field Observations**

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**FIELD OBSERVATION SUMMARY:** Comments are required for any rating other than "Satisfactory". Summarize the "Notes" blocks above, and ensure you annotate the question number for each comment.