Inspection Output (IOR)

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Inspection Information

Inspection Name	8263 - City of Enumclaw PA	Operator(s)	ENUMCLAW GAS DEPT, CITY OF (4500)	Plan Submitted	03/09/2021
Status	PLANNED	Lead	Scott Anderson	Plan Approval	03/12/2021 by Joe Subsits
Start Year	2021	Team Members	Scott Rukke, David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Derek Norwood, Darren Tinnerstet	All Activity Start	04/05/2021
System Type	GT	Observer(s)	Deborah Becker, Rell Koizumi	All Activity End	04/05/2021
Protocol Set ID	GT.2021.01	Supervisor	Joe Subsits	Inspection Submitted	--
		Director	Sean Mayo	Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

This inspection consisted of a review of records and procedure of the City of Enumclaw's Natural Gas Department. The City of Enumclaw is an LDC municipality that has approximately 4500 customers.

Facilities visited and Total AFOD

1 AFOD

Summary of Significant Findings

No significant finding came as a result of this inspection.

Primary Operator contacts and/or participants

Ed Hawthorne, City of Enumclaw, Gas Manager

AJ Haas, City of Enumclaw, Gas Engineer

Jessi Paulson, City of Enumclaw, Administrative Assistant

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	PA	City of Enumclaw - Natural Gas Department	unit	88992	Compressor Stations Storage Fields Bottle/Pipe - Holders Vault Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric AMAOP CDA	41	41	41	100.0%

Report Filters: Results: all

1. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	PA	n/a	PD	P, R, O	Detail	

Plan Implementations

#	Activity Name	SMART Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1.	Records and Procedures	--	04/05/2021 04/05/2021	n/a	PD	all assets	all types	41	41	41	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.
2. Percent completion excludes unanswered questions planned as "always observe".

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Records and Procedures	COMPLETED	04/06/2021	Records and Procedures	PA

Results (all values, 41 results)

47 (instead of 41) results are listed due to re-presentation of questions in more than one sub-group.

EP.ERG: Emergency Response

1. Question Result, ID, References: Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03) (also presented in: PD.PA)

   Question Text: *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*

   Assets Covered: PA

   Result Notes: Reviewed Enumclaw's city officials mailing list along with the mailer that goes to public officials. Also reviewed meeting minutes and sign in sheets from 2018-2020. No issues.

MO.RW: ROW Markers, Patrols, Leakage Survey and Monitoring

2. Question Result, ID, References: NA, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c)) (also presented in: PD.RW)

   Question Text: *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*

   Assets Covered: PA

   Result Notes: Enumclaw does not have transmission. Did reviewed Enumclaw's Procedure 2-D, section 1.1 patrols leak survey.

3. Question Result, ID, References: NA, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c)) (also presented in: PD.RW)

   Question Text: *Do records indicate that ROW surface conditions have been patrolled as required?*

   Assets Covered: PA

   Result Notes: Enumclaw does not have transmission.

4. Question Result, ID, References: Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: PD.RW)
   - Question Text: *Are line markers placed and maintained as required?*
   - Assets Covered: PA

5. Question Result, ID, References: Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: PD.RW)
   - Question Text: *Are the ROW conditions acceptable for the type of patrolling used?*
   - Assets Covered: PA

6. Question Result, ID, References: NA, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: PD.RW)
   - Question Text: *Does the process adequately cover the requirements for placement of ROW markers?*
   - Assets Covered: PA
   - Result Notes: Enumclaw does not have transmission. Did review Enumclaw procedure 2-F, Line Markers.

PD.DP: Damage Prevention

7. Question Result, ID, References: Sat, PD.DP.PDPROGRAM.P, 192.614(a)
   - Question Text: *Is a damage prevention program approved and in place?*
   - Assets Covered: PA
   - Result Notes: Enumclaw Procedure 2-G. No issues.

8. Question Result, ID, References: Sat, PD.DP.ONECALL.P, 192.614(b)
   - Question Text: *Does the process require participation in qualified one-call systems?*
   - Assets Covered: PA
   - Result Notes: Enumclaw Procedure 2-G. No issues

9. Question Result, ID, References: Sat, PD.DP.EXCAVATEMARK.P, 192.614(c)(5)
   - Question Text: *Does the process require marking proposed excavation sites to CGA Best Practices or use more stringent and accurate requirements?*
   - Assets Covered: PA
   - Result Notes: Enumclaw Procedure 2-G. Enumclaw follows CGA best practices and occasionally uses more stringent and accurate requirements. No issues.

10. Question Result, ID, References: Sat, PD.DP.TPD.P, 192.614(c)(1)
    - Question Text: *Does the process specify how reports of Third Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?*
    - Assets Covered: PA
    - Result Notes: Enumclaw Procedure 2-G, 4.1(a). Also reviewed the mailers. No issues.

11. Question Result, ID, References: Sat, PD.DP.TPDONECALL.P, 192.614(c)(3)
    - Question Text: *Does the process specify how reports of TPD are checked against One-Call tickets?*
    - Assets Covered: PA
    - Result Notes: Enumclaw Procedure 2-G, section 6. Also reviewed Enumclaw DIMP TPD maps. No issues.

12. Question Result, ID, References: NA, PD.DP.ONECALL.O, 192.614(c)(3)
    - Question Text: *Observe operator process a "One Call" ticket.*
    - Assets Covered: PA
    - Result Notes: No such activity/condition was observed during the inspection.

13. Question Result, ID, References: Sat, PD.DP.PDPROGRAM.R, 192.614(c)
    - Question Text: *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*
    - Assets Covered: PA

Result Notes Reviewed Enumclaw excavator list that identify persons who normally engage in excavation activities in the area from 2018-2020. Enumclaw staff receives an email from the on-call notification system that let's them know to go out and locate. No issues.

14. Question Result, ID, References Sat, PD.DP.DPINFOGATHER.P, 192.917(b) (192.935(b)(1)(ii))

Question Text *Does the process require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments?*

Assets Covered PA

Result Notes Reviewed Enumclaw DIMP section 6-A, chapter 3. No issues.

15. Question Result, ID, References Sat, PD.DP.DPINFOGATHER.R, 192.947(b) (192.917(b), 192.935(b)(1)(ii))

Question Text *Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?*

Assets Covered PA

Result Notes Reviewed Enumclaw DIMP maps and procedures relating to collecting and recording this data. No issues.

PD.PA: Public Awareness

16. Question Result, ID, References Sat, PD.PA.ASSETS.P, 192.616(b) (API RP 1162 Section 2.7 Step 4)

Question Text *Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each?*

Assets Covered PA

Result Notes Enumclaw procedure 7-A. No issues.

17. Question Result, ID, References Sat, PD.PA.AUDIENCEID.P, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)

Question Text *Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?*

Assets Covered PA

Result Notes Enumclaw procedure 7-A, sec. 2.1. No issues

18. Question Result, ID, References Sat, PD.PA.MGMTSUPPORT.P, 192.616(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)

Question Text *Does the operator's program documentation demonstrate management support?*

Assets Covered PA

Result Notes Reviewed Enumclaw Procedure 7-A, sec. 10. No issues.

19. Question Result, ID, References Sat, PD.PA.PROGRAM.P, 192.616(a) (192.616(h))

Question Text *Has the continuing public education (awareness) program been established as required?*

Assets Covered PA

Result Notes Reviewed Enumclaw Procedure 7-A, sec. 8. No issues.

20. Question Result, ID, References Sat, PD.PA.AUDIENCEID.R, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)

Question Text *Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages?*

Assets Covered PA

Result Notes Reviewed Enumclaw records from 2018-2020. Reviewed mailing lists including the listed audiences in this question. Also reviewed the mailers sent to the audiences. No issues.

21. Question Result, ID, References Sat, PD.PA.MESSAGES.P, 192.616(c) (API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 Section 5)

Question Text *Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where gas is transported?*

Assets Covered PA

Result Notes Reviewed Enumclaw procedure 7-B-1 tables. No issues.

22. Question Result, ID, References Sat, PD.PA.SUPPLEMENTAL.P, 192.616(c) (API RP 1162 Section 6.2)

Question Text *Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162?*

Assets Covered PA

Result Notes Reviewed Enumclaw procedure 7-C. No issues.

23. Question Result, ID, References Sat, PD.PA.EDUCATE.R, 192.616(d) (192.616(f))

Question Text *Did delivered messages specifically include provisions to educate the public, emergency officials, local public officials, and excavators on: (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with unintended releases from a gas pipeline facility; (3) Physical indications of a possible release; (4) Steps to be taken for public safety in the event of a gas pipeline release; and (5) Procedures to report such an event?*

Assets Covered PA

Result Notes Reviewed Enumclaw's mailer delivered to the listed audiences. The mailer includes the listed topics in this question. No issues.

24. Question Result, ID, References Sat, PD.PA.LOCATIONMESSAGE.R, 192.616(e) (192.616(f))

Question Text *Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations?*

Assets Covered PA

Result Notes Reviewed Enumclaw's mailer delivered to the listed audiences. No issues.

25. Question Result, ID, References Sat, PD.PA.MESSAGEFREQUENCY.R, 192.616(c) (API RP 1162 Table 2-1, API RP 1162 Table 2-2, API RP 1162 Table 2-3)

Question Text *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3?*

Assets Covered PA

Result Notes Enumclaw meets the baseline delivery frequencies and exceeds delivery frequencies for the affected public by delivering annually. Reviewed records showing frequency dates from 2018-2020. No issues.

26. Question Result, ID, References Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03) (also presented in: EP.ERG)

Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*

Assets Covered PA

Result Notes Reviewed Enumclaw's city officials mailing list along with the mailer that goes to public officials. Also reviewed meeting minutes and sign in sheets from 2018-2020. No issues.

27. Question Result, ID, References Sat, PD.PA.LANGUAGE.P, 192.616(g) (API RP 1162 Section 2.3.1)

Question Text *Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*

Assets Covered PA

Result Notes Reviewed Enumclaw Procedure 7-A sec. 7. No issues.

28. Question Result, ID, References NA, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1)

Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*

Assets Covered PA

Result Notes Enumclaw procedure 7-A, sec. 7. The procedure states: If census data changes indicating areas within the pipeline boundary are considered concentrations of non-English speaking populations. The city will revise the PA program to reflect those population.

29. Question Result, ID, References Sat, PD.PA.EVALPLAN.P, 192.616(i) (192.616(c), API RP 1162 Section 8, API RP 1162 Appendix E)

Question Text *Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?*

Assets Covered PA

Result Notes Reviewed Enumclaw procedure 7-D. No issues.

30. Question Result, ID, References Sat, PD.PA.EVALIMPL.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)

Question Text *Has an audit or review of the operator's program implementation been performed annually since the program was developed?*

Assets Covered PA

Result Notes Reviewed Enumclaw implementation review for 2018-2020, the review has been performed annually. No issues.

31. Question Result, ID, References Sat, PD.PA.AUDITMETHODS.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)

Question Text *Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of program implementation?*

Assets Covered PA

Result Notes Enumclaw performs an internal assessment for program implementation. Reviewed the annual letters produced after an audit is performed for 2018-2020. No issues.

32. Question Result, ID, References NA, PD.PA.PROGRAMIMPROVE.R, 192.616(c) (API RP 1162 Section 8.3)

Question Text *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?*

Assets Covered PA

Result Notes No changes

33. Question Result, ID, References Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4)

Question Text *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?*

Assets Covered PA

Result Notes City of Enumclaw used a single effectiveness survey for all stakeholder audiences. Reviewed Enumclaw effectiveness evaluation letter from the last effectiveness evaluation performed in 2017, there were no issues. An effectiveness evaluation will be performed July 2021. No issues.

34. Question Result, ID, References Sat, PD.PA.MEASUREOUTREACH.R, 192.616(c) (API RP 1162 Section 8.4.1)

Question Text *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?*

Assets Covered PA

Result Notes Enumclaw Procedure 7-E, sec 6. Reviewed survey results. No issues.

35. Question Result, ID, References Sat, PD.PA.MEASUREUNDERSTANDABILITY.R, 192.616(c) (API RP 1162 Section 8.4.2)

Question Text *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?*

Assets Covered PA

Result Notes Enumclaw Procedure 7-E, sec 6. Reviewed survey results. No issues.

36. Question Result, ID, References Sat, PD.PA.MEASUREBEHAVIOR.R, 192.616(c) (API RP 1162 Section 8.4.3)

Question Text *In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?*

Assets Covered PA

Result Notes Enumclaw Procedure 7-E, sec 6. Reviewed survey results. No issues.

37. Question Result, ID, References Sat, PD.PA.MEASUREBOTTOM.R, 192.616(c) (API RP 1162 Section 8.4.4)

Question Text *Were bottom-line results of the program measured by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures?*

Assets Covered PA

Result Notes Enumclaw Procedure 7-E, sec 6. Reviewed survey results. No issues.

38. Question Result, ID, References NA, PD.PA.CHANGES.R, 192.616(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)

Question Text *Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?*

Assets Covered PA

Result Notes No changes due to program effectiveness.

PD.RW: ROW Markers, Patrols, Monitoring

39. Question Result, ID, References NA, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c)) (also presented in: MO.RW)

Question Text *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*

Assets Covered PA

Result Notes Enumclaw does not have transmission. Did reviewed Enumclaw's Procedure 2-D, section 1.1 patrols leak survey.

40. Question Result, ID, References NA, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c)) (also presented in: MO.RW)

Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*

Assets Covered PA

Result Notes Enumclaw does not have transmission.

41. Question Result, ID, References Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: MO.RW)

Question Text *Are line markers placed and maintained as required?*

Assets Covered PA

42. Question Result, ID, References Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: MO.RW)

Question Text *Are the ROW conditions acceptable for the type of patrolling used?*

Assets Covered PA

43. Question Result, ID, References NA, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: MO.RW)

Question Text *Does the process adequately cover the requirements for placement of ROW markers?*

Assets Covered PA

Result Notes Enumclaw does not have transmission. Did review Enumclaw procedure 2-F, Line Markers.

PD.SP: Special Permits

44. Question Result, ID, References NA, PD.SP.REPAIR.P, 190.341(d)(2)

Question Text *If the operator operates a pipeline under a special permit have the processes been modified to incorporate the requirements of the permit for required repairs?*

Assets Covered PA

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

45. Question Result, ID, References NA, PD.SP.BESTPRACTICE.P, 190.341(d)(2)

Question Text *If the operator operates a pipeline under a special permit, do the processes specify implementation of applicable CGA Best Practices?*

Assets Covered PA

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

46. Question Result, ID, References NA, PD.SP.REPAIR.R, 190.341(d)(2)

Question Text *If the operator operates a pipeline under a special permit, do records indicate that required repairs were performed?*

Assets Covered PA

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

47. Question Result, ID, References NA, PD.SP.REQUIREMENT.O, 190.341(d)(2)

Question Text *If the operator operates a pipeline under a special permit verify that the requirements have been implemented.*

Assets Covered PA

Result Notes No such activity/condition was observed during the inspection.

Report Parameters: Results: all

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.