

# Inspection Output (IOR)

Generated on 2022.August.17 16:09

## Report Filters

Assets **Inland Empire Paper PA / IEP**

Results **All**

## Inspection Information

Inspection Name	8433 Inland Empire PA	Operator(s)	INLAND EMPIRE PAPER CO (8140)	Plan Submitted	05/11/2022
		Lead	Anthony Dorrough	Plan Approval	05/12/2022 by Scott Rukke
Status	PLANNED	Team Members	David Cullom, Dennis Ritter, Lex Vinsel, David D Lykken, Derek Norwood, Darren Tinnerstet	All Activity Start	08/10/2022
Start Year	2022	Supervisor	Scott Rukke	All Activity End	08/12/2022
System Type	GT	Director	Sean Mayo	Inspection Submitted	--
Protocol Set ID	WA.GT.2022.01			Inspection Approval	--

## Inspection Summary

### Inspection Scope and Summary

*This Public Awareness (PA) inspection will cover a review of process, procedure and all records pertaining to PA.*

### Summary of Significant Findings

There were no findings as result of this inspection.

### Primary Operator contacts and/or participants

Doug Krapas/Environmental Manager/Inland Empire Paper Company (IEP) (509) 924-1911 (for all contacts)

Kevin Davis/Production Manager/IEP

Theron (TJ) Eixenberger/Plant Engineer/IEP

### Operator executive contact and mailing address for any official correspondence

Kevin Rasler/President/IEP

Tony Ventresco/Human Resources Manager/IEP

## Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1. IEP	Inland Empire Paper PA	unit	--	Compressor Stations Bottle/Pipe - Holders Vault Service Line	45	45	45	45	100.0%

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
				Gas Storage Field (Aboveground) Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric AMAOP CDA Abandoned				

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

## Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	IEP	--	PD	P, R, O	Detail	--
2.	IEP	--	--	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. IEP	--	08/10/2022 -- 08/12/2022		all planned questions	all assets	all types	45	45	45	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".

3. Question counts and completion percents are filtered to include only questions planned for and results applied to the filtered Assets.

## Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	IEP PA - COPY	COMPLETED	08/17/2022	IEP	IEP

## Results (all values, 45 results)

51 (instead of 45) results are listed due to re-presentation of questions in more than one sub-group.

### EP.ERG: Emergency Response

- Question Result, ID, Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), References 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 IEP

Result Notes IEP sends letters to the appropriate fire, police, public officials and utility owners to establish liaison, this is satisfactory for now and considered the minimum requirement, however staff mentioned that after adoption of the new API 1162 (3rd version) face to face interactions are encouraged and will be considered the minimum.

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

2. Question Result, ID, References **Sat, 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 **IEP**
3. Question Result, ID, References **Sat, 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 **IEP**
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 **IEP**
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 **IEP**
6. Question Result, ID, References **Sat, 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 **IEP**

## 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 **IEP**
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 **IEP**
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 **IEP**
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 **IEP**
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 **IEP**
12. Question Result, ID, References **Sat, PD.DP.ONECALL.O, 192.614(c)(3)**  
Question Text *Observe operator process a "One Call" ticket.*  
Assets Covered **IEP**

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 **IEP**
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 **IEP**
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 **IEP**  
 Result Notes **IEP utilizes a patrolling list that incorporates a number of damage prevention tasks in the same document.**
16. Question Result, ID, References **Sat, PD.DP.NOTICETOEXCAVATOR.P,**  
 Question Text *Is there a process to provide the required information to excavators who damage pipeline facilities?*  
 Assets Covered **IEP**
17. Question Result, ID, References **NA, PD.DP.NOTICETOEXCAVATOR.R,**  
 Question Text *Do records indicate that the operator provides the required information to excavators who damage pipeline facilities?*  
 Assets Covered **IEP**  
 Result Notes **No such activity/condition was observed during the inspection.**
18. Question Result, ID, References **Sat, PD.DP.COMMISSIONREPORT.P,**  
 Question Text *Is there a process to report to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-93-200(9)?*  
 Assets Covered **IEP**
19. Question Result, ID, References **NA, PD.DP.COMMISSIONREPORT.R,**  
 Question Text *Do records indicate the operator reports to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-93-200(9)?*  
 Assets Covered **IEP**  
 Result Notes **No such activity/condition was observed during the inspection.**

## **PD.PA: Public Awareness**

20. 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 **IEP**
21. 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 **IEP**
22. 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 IEP

23. 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 IEP

24. 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 IEP

25. 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 IEP

26. 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 IEP

27. 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 IEP

28. 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 IEP

29. 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 IEP

30. 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 IEP

Result Notes IEP sends letters to the appropriate fire, police, public officials and utility owners to establish liaison, this is satisfactory for now and considered the minimum requirement, however staff mentioned that after adoption of the new API 1162 (3rd version) face to face interactions are encouraged and will be considered the minimum.

31. 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 IEP

32. Question Result, ID, References **Sat, 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 **IEP**
33. 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 **IEP**
34. 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 **IEP**
35. 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 **IEP**
36. 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 **IEP**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
37. 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 **IEP**
38. Question Result, ID, References **NA, 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 **IEP**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. IEP is relying on the fact that there has been no third party damage to the present as evidence of the programs effectiveness so far.**
39. Question Result, ID, References **NA, 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 **IEP**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. IEP is relying on the fact that there has been no third party damage to the present as evidence of the programs effectiveness so far.**
40. Question Result, ID, References **NA, 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 **IEP**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. IEP is relying on the fact that there has been no third party damage to the present as evidence of the programs effectiveness so far.**

41. Question Result, ID, References **NA, 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 **IEP**  
 Result Notes **No such activity/condition was observed during the inspection.**
42. 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 **IEP**  
 Result Notes **No such activity/condition was observed during the inspection.**

## PD.RW: ROW Markers, Patrols, Monitoring

43. Question Result, ID, References **Sat, 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 **IEP**
44. Question Result, ID, References **Sat, 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 **IEP**
45. 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 **IEP**
46. 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 **IEP**
47. Question Result, ID, References **Sat, 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 **IEP**

## PD.SP: Special Permits

48. 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 **IEP**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
49. 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 **IEP**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
50. 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 IEP

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

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

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

Assets Covered IEP

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

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.



# Inspection Results (IRR)

Generated on 2022.August.17 16:06

- IEP (51)

## Inspection Results Report (ALL Results) - Scp\_PK IEP

Row	Assets	Result (Note <sup>1</sup> )	Sub-Group	Qst #	Question ID	References	Question Text
1.	IEP	Sat	2	EP.ERG	24. 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)	Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?
2.	IEP	Sat	2	MO.RW	1. MO.RW.PATROL.P	192.705(a) (192.705(b), 192.705(c))	Does the process adequately cover the requirements for patrolling the ROW and conditions reported?
3.	IEP	Sat	2	MO.RW	2. MO.RW.PATROL.R	192.709(c) (192.705(a), 192.705(b), 192.705(c))	Do records indicate that ROW surface conditions have been patrolled as required?
4.	IEP	Sat	2	MO.RW	3. MO.RW.ROWMARKER.O	192.707(a) (192.707(b), 192.707(c), 192.707(d))	Are line markers placed and maintained as required?
5.	IEP	Sat	2	MO.RW	4. MO.RW.ROWCONDITION.O	192.705(a) (192.705(c))	Are the ROW conditions acceptable for the type of patrolling used?
6.	IEP	Sat	2	MO.RW	5. MO.RW.ROWMARKER.P	192.707(a) (192.707(b), 192.707(c), 192.707(d))	Does the process adequately cover the requirements for placement of ROW markers?
7.	IEP	Sat		PD.DP	1. PD.DP.PDPROGRAM.P	192.614(a)	Is a damage prevention program approved and in place?
8.	IEP	Sat		PD.DP	2. PD.DP.ONECALL.P	192.614(b)	Does the process require participation in qualified one-call systems?
9.	IEP	Sat		PD.DP	3. PD.DP.EXCAVATEMARK.P	192.614(c)(5)	Does the process require marking proposed excavation sites to CGA Best Practices or use more stringent and accurate requirements?
10.	IEP	Sat		PD.DP	4. PD.DP.TPD.P	192.614(c)(1)	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?
11.	IEP	Sat		PD.DP	5. PD.DP.TPDONECALL.P	192.614(c)(3)	Does the process specify how reports of TPD are checked against One-Call tickets?

## Inspection Results Report (ALL Results) - Scp\_PK IEP

Row	Assets	Result (Note <sup>1</sup> )	Sub-Group	Qst #	Question ID	References	Question Text
12.	IEP	Sat	PD.DP	6.	PD.DP.ONECALL.O	192.614(c)(3)	Observe operator process a "One Call" ticket.
13.	IEP	Sat	PD.DP	7.	PD.DP.PDPROGRAM.R	192.614(c)	Does the damage prevention program meet minimum requirements specified in 192.614(c)?
14.	IEP	Sat	PD.DP	8.	PD.DP.DPINFOGATHER.P	192.917(b) (192.935(b)(1)(ii))	Does the process require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments?
15.	IEP	Sat	PD.DP	9.	PD.DP.DPINFOGATHER.R	192.947(b) (192.917(b), 192.935(b)(1)(ii))	Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?
16.	IEP	Sat	PD.DP	10.	PD.DP.NOTICETOEXCAVATOR.P		Is there a process to provide the required information to excavators who damage pipeline facilities?
17.	IEP	NA	PD.DP	11.	PD.DP.NOTICETOEXCAVATOR.R		Do records indicate that the operator provides the required information to excavators who damage pipeline facilities?
18.	IEP	Sat	PD.DP	12.	PD.DP.COMMISSIONREPORT.P		Is there a process to report to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-93-200(9)?
19.	IEP	NA	PD.DP	13.	PD.DP.COMMISSIONREPORT.R		Do records indicate the operator reports to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-93-200(9)?
20.	IEP	Sat	PD.PA	1.	PD.PA.ASSETS.P	192.616(b) (API RP 1162 Section 2.7 Step 4)	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?
21.	IEP	Sat	PD.PA	2.	PD.PA.AUDIENCEID.P	192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)	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,

## Inspection Results Report (ALL Results) - Scp\_PK IEP

Row	Assets	Result (Note <sup>1</sup> )	Sub-Group	Qst #	Question ID	References	Question Text
							school districts, businesses, and residents?
22.	IEP	Sat	PD.PA	3.	PD.PA.MGMTSUPPORT.P	192.616(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)	Does the operator's program documentation demonstrate management support?
23.	IEP	Sat	PD.PA	4.	PD.PA.PROGRAM.P	192.616(a) (192.616(h))	Has the continuing public education (awareness) program been established as required?
24.	IEP	Sat	PD.PA	5.	PD.PA.AUDIENCEID.R	192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)	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?
25.	IEP	Sat	PD.PA	6.	PD.PA.MESSAGES.P	192.616(c) (API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 Section 5)	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?
26.	IEP	Sat	PD.PA	7.	PD.PA.SUPPLEMENTAL.P	192.616(c) (API RP 1162 Section 6.2)	Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162?
27.	IEP	Sat	PD.PA	8.	PD.PA.EDUCATE.R	192.616(d) (192.616(f))	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?
28.	IEP	Sat	PD.PA	9.	PD.PA.LOCATIONMESSAGE.R	192.616(e) (192.616(f))	Were messages developed and delivered to advise

## Inspection Results Report (ALL Results) - Scp\_PK IEP

Row	Assets	Result (Note <sup>1</sup> )	Sub-Group	Qst #	Question ID	References	Question Text
							affected municipalities, school districts, businesses, and residents of pipeline facility locations?
29.	IEP	Sat		PD.PA	10. 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)	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?
30.	IEP	Sat	2	PD.PA	11. 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)	Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?
31.	IEP	Sat		PD.PA	12. PD.PA.LANGUAGE.P	192.616(g) (API RP 1162 Section 2.3.1)	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?
32.	IEP	Sat		PD.PA	13. PD.PA.LANGUAGE.R	192.616(g) (API RP 1162 Section 2.3.1)	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?
33.	IEP	Sat		PD.PA	14. PD.PA.EVALPLAN.P	192.616(i) (192.616(c), API RP 1162 Section 8, API RP 1162 Appendix E)	Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?
34.	IEP	Sat		PD.PA	15. PD.PA.EVALIMPL.R	192.616(c) (192.616(i), API RP 1162 Section 8.3)	Has an audit or review of the operator's program implementation been performed annually since the program was developed?
35.	IEP	Sat		PD.PA	16. PD.PA.AUDITMETHODS.R	192.616(c) (192.616(i), API RP 1162 Section 8.3)	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?
36.	IEP	NA		PD.PA	17. PD.PA.PROGRAMIMPROVE.R	192.616(c) (API RP 1162 Section 8.3)	Were changes made to improve the program and/or the implementation process

## Inspection Results Report (ALL Results) - Scp\_PK IEP

Row	Assets	Result (Note <sup>1</sup> )	Sub-Group	Qst #	Question ID	References	Question Text
							based on the results and findings of the annual audit(s)?
37.	IEP	Sat		PD.PA	18. PD.PA.EVALEFFECTIVENESS.R	192.616(c) (API RP 1162 Section 8.4)	Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?
38.	IEP	NA		PD.PA	19. PD.PA.MEASUREOUTREACH.R	192.616(c) (API RP 1162 Section 8.4.1)	In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?
39.	IEP	NA		PD.PA	20. PD.PA.MEASUREUNDERSTANDABILITY.R	192.616(c) (API RP 1162 Section 8.4.2)	In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?
40.	IEP	NA		PD.PA	21. PD.PA.MEASUREBEHAVIOR.R	192.616(c) (API RP 1162 Section 8.4.3)	In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?
41.	IEP	NA		PD.PA	22. PD.PA.MEASUREBOTTOM.R	192.616(c) (API RP 1162 Section 8.4.4)	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?
42.	IEP	NA		PD.PA	23. PD.PA.CHANGES.R	192.616(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)	Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?
43.	IEP	Sat	2	PD.RW	1. MO.RW.PATROL.P	192.705(a) (192.705(b), 192.705(c))	Does the process adequately cover the requirements for patrolling the ROW and conditions reported?
44.	IEP	Sat	2	PD.RW	2. MO.RW.PATROL.R	192.709(c) (192.705(a), 192.705(b), 192.705(c))	Do records indicate that ROW surface conditions have been patrolled as required?
45.	IEP	Sat	2	PD.RW	3. MO.RW.ROWMARKER.O	192.707(a) (192.707(b), 192.707(c), 192.707(d))	Are line markers placed and maintained as required?

## Inspection Results Report (ALL Results) - Scp\_PK IEP

Row	Assets	Result (Note <sup>1</sup> )	Sub-Group	Qst #	Question ID	References	Question Text
46.	IEP	Sat	2	PD.RW	4. MO.RW.ROWCONDITION.O	192.705(a) (192.705(c))	Are the ROW conditions acceptable for the type of patrolling used?
47.	IEP	Sat	2	PD.RW	5. MO.RW.ROWMARKER.P	192.707(a) (192.707(b), 192.707(c), 192.707(d))	Does the process adequately cover the requirements for placement of ROW markers?
48.	IEP	NA		PD.SP	1. PD.SP.REPAIR.P	190.341(d)(2)	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?
49.	IEP	NA		PD.SP	2. PD.SP.BESTPRACTICE.P	190.341(d)(2)	If the operator operates a pipeline under a special permit, do the processes specify implementation of applicable CGA Best Practices?
50.	IEP	NA		PD.SP	3. PD.SP.REPAIR.R	190.341(d)(2)	If the operator operates a pipeline under a special permit, do records indicate that required repairs were performed?
51.	IEP	NA		PD.SP	4. PD.SP.REQUIREMENT.O	190.341(d)(2)	If the operator operates a pipeline under a special permit verify that the requirements have been implemented.

1. Result is repeated (N) times in this report due to re-presentation of the question in multiple sub-groups.

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.