

# Inspection Output (IOR)

Generated on 2022.May.23 17:05

## Report Filters

Assets All, and including items not linked to any asset.

Results All

## Inspection Information

Inspection Name	8504 - City of Enumclaw Section 114	Operator(s)	ENUMCLAW GAS DEPT, CITY OF (4500)	Plan Submitted	05/03/2022
Status	PLANNED	Lead	Derek Norwood	Plan Approval	05/03/2022 by Scott Rukke
Start Year	2022	Team Members	David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Scott Anderson, Darren Tinnerstet	All Activity Start	05/04/2022
System Type	GD	Observer(s)	Deborah Becker	All Activity End	05/04/2022
Protocol Set ID	GD.2022.02	Supervisor	Scott Rukke	Inspection Submitted	--
		Director	Sean Mayo	Inspection Approval	--

## Inspection Summary

### Inspection Scope and Summary

The was an inspection of City of Enumclaw procedures for compliance with Pipes Act of 2020 Section 114.

### Facilities visited and Total AFOD

The inspection was completed at Enumclaw's office. No gas facilities were visited.

1 AFOD

### Summary of Significant Findings

*(DO NOT Discuss Enforcement options)*

There are no probable violations or areas of concern as a result of this inspection.

### Primary Operator contacts and/or participants

Nick Peelo  
Gas Utility Manager

AJ Haas  
Gas Engineer

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

Mr. Jan Molinaro  
Mayor  
2041 Railroad St  
Enumclaw, WA 98022

## Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1. 88992 (115)	City of Enumclaw - Natural Gas Department	unit	88992	Storage Fields Bottle/Pipe - Holders Vault Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Abandoned	20	20	20	20	100.0%

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

## Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	88992 (115)	--	114.GD	P, R, O, S	Detail	--

## Plan Implementations

Activity # Name	SMART Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Qst Assets	Type(s)	Planned	Required	Inspected	Total	Required % Complete
1. Section 114	--	05/04/2022 -- 05/04/2022	--	all planned questions	all assets	all types	20	20	20	20	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	Section 114	COMPLETED	05/19/2022	Section 114	88992 (115)

## Results (all values, 20 results)

40 (instead of 20) results are listed due to re-presentation of questions in more than one sub-group.

### 114.GD: Section 114 - Gas Distribution

1. Question Result, ID, References **NIC, SRN.114.INSPECTCVRG.S**, (also presented in: 114.MM)

Question Text *What are your assets comprised of?*

Assets Covered **88992 (115)**

Result Notes **Natural Gas Distribution, PE and steel pipeline, 1/2" pipe up to 6" steel**

2. Question Result, ID, References **NIC, SRN.114.GASTRANSPORT.S**, (also presented in: 114.MM)

Question Text *Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?*

Assets Covered **88992 (115)**

Result Notes **Natural gas distribution**

3. Question Result, ID, References **NIC, SRN.114.DRIVERENGINE.S**, (also presented in: 114.MM)  
Question Text *Do you use natural gas-fueled drivers or engines to compress natural gas?*  
Assets Covered **88992 (115)**  
Result Notes **No, Only gas distribution**
4. Question Result, ID, References **NIC, SRN.114.NGUSE.S**, (also presented in: 114.MM)  
Question Text *Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?*  
Assets Covered **88992 (115)**  
Result Notes **No, Only gas distribution**
5. Question Result, ID, References **Sat, 114.114.LKRLSID.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)  
Question Text *Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?*  
Assets Covered **88992 (115)**  
Result Notes **O&M Section 2-N-2 refers to procedures for continuing surveillance (2-C), Leak survey (2-D) and reports from public (3-B)**  
  
**Reviewed these documents**
6. Question Result, ID, References **Sat, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)  
Question Text *Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?*  
Assets Covered **88992 (115)**  
Result Notes **O&M Section 2-Q for startup and shutdown refers to using flare stack when appropriate, specific procedures written for new installations include flaring when blowing down gas pressure**
7. Question Result, ID, References **NA, 114.114.LKRLSUNEXPCTVENT.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)  
Question Text *Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?*  
Assets Covered **88992 (115)**  
Result Notes **Enumclaw has no pressure relief valves that vent to atmosphere**
8. Question Result, ID, References **Sat, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)  
Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*  
Assets Covered **88992 (115)**  
Result Notes **O&M Section 2-N-1 (Leak Investigation)**
9. Question Result, ID, References **Sat, 114.114.LKRLSDETECTLK.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)  
Question Text *Do procedures include instructions for personnel to detect leaks to help further reduce emission in stations and along the right of way?*  
Assets Covered **88992 (115)**  
Result Notes **O&M Section 2-D (Leak Surveys), Reg Station Inspection checklist has section to check for leaks, OQ task for gas leak investigation 192-1202**
10. Question Result, ID, References **Sat, 114.114.LKRLSIDMITRPR.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)  
Question Text *Do procedures define a process to identify, classify, mitigate and repair leaks?*  
Assets Covered **88992 (115)**  
Result Notes **O&M Section 2-D-5 for leak grading, Section 2-P-6 Repair of Leaks**
11. Question Result, ID, References **Sat, 114.114.LKMITRPRLAUF.P, 49 U.S.C. 60108(a)** (also presented in: 114.MM)

Question Text *Do procedures provide for review of Lost & Unaccounted for Gas (LAUF) and do procedures specify actions to reduce the associated volume?*

Assets Covered 88992 (115)

Result Notes Gas Manager maintains and unaccounted gas spreadsheet and validates the data monthly, should be less than 1%

O&M Section 2-N-10

12. Question Result, ID, References Sat, 114.114.REGSTATIONOM.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do maintenance or operational procedures contain measures for reduction of natural gas releases from regulators?*

Assets Covered 88992 (115)

Result Notes Reg Station Inspection checklist has section to check for leaks, OQ task for gas leak investigation 192-1202

13. Question Result, ID, References Sat, 114.114.REGSTATIONCONFIG.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do maintenance or operational procedures contain measures for identifying potential configuration changes that would reduce natural gas releases from regulators?*

Assets Covered 88992 (115)

Result Notes O&M Section 2-L-1(f)

14. Question Result, ID, References NA, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*

Assets Covered 88992 (115)

Result Notes The only relief valve was removed from the system in 2021

15. Question Result, ID, References Sat, 114.114.FLARE.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?*

Assets Covered 88992 (115)

Result Notes O&M Section 2-Q-2(k) allows for flaring when blowing down a pipeline, no permanent flare installed

16. Question Result, ID, References Sat, 114.114.GNLDSGNCNFG.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*

Assets Covered 88992 (115)

Result Notes O&M Section 2-L-1(f) for regulator stations

17. Question Result, ID, References Sat, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?*

Assets Covered 88992 (115)

Result Notes O&M Section 2-D (Leak surveys), 2-N-1 (Leak Investigation)

18. Question Result, ID, References Sat, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*

Assets Covered 88992 (115)

Result Notes O&M Section 2-D (Leak surveys), 2-N-1 (Leak Investigation)

19. Question Result, ID, References NA, 114.LEAKPRONE.LKMITGRPREXAMPLE.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)

Question Text *Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?*

Assets Covered 88992 (115)  
Result Notes Enumclaw does not have any of these pipe materials in their system

20. Question Result, ID, References Sat, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108(a) (also presented in: 114.MM)  
Question Text *Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?*

Assets Covered 88992 (115)  
Result Notes Enumclaw has replaced all unprotected steel and their DIMP plan has a process for replacing steel services and farm taps

DIMP Plan

## 114.MM: Section 114 - Master Meter

21. Question Result, ID, References NIC, SRN.114.INSPECTCVRG.S, (also presented in: 114.GD)

Question Text *What are your assets comprised of?*

Assets Covered 88992 (115)  
Result Notes Natural Gas Distribution, PE and steel pipeline, 1/2" pipe up to 6" steel

22. Question Result, ID, References NIC, SRN.114.GASTRANSPORT.S, (also presented in: 114.GD)

Question Text *Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?*

Assets Covered 88992 (115)  
Result Notes Natural gas distribution

23. Question Result, ID, References NIC, SRN.114.DRIVERENGINE.S, (also presented in: 114.GD)

Question Text *Do you use natural gas-fueled drivers or engines to compress natural gas?*

Assets Covered 88992 (115)  
Result Notes No, Only gas distribution

24. Question Result, ID, References NIC, SRN.114.NGUSE.S, (also presented in: 114.GD)

Question Text *Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?*

Assets Covered 88992 (115)  
Result Notes No, Only gas distribution

25. Question Result, ID, References Sat, 114.114.LKRLSID.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?*

Assets Covered 88992 (115)  
Result Notes O&M Section 2-N-2 refers to procedures for continuing surveillance (2-C), Leak survey (2-D) and reports from public (3-B)

Reviewed these documents

26. Question Result, ID, References Sat, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?*

Assets Covered 88992 (115)  
Result Notes O&M Section 2-Q for startup and shutdown refers to using flare stack when appropriate, specific procedures written for new installations include flaring when blowing down gas pressure

27. Question Result, ID, References NA, 114.114.LKRLSUNEXPCTVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?*

Assets Covered 88992 (115)

Result Notes Enumclaw has no pressure relief valves that vent to atmosphere

28. Question Result, ID, References Sat, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*

Assets Covered 88992 (115)

Result Notes O&M Section 2-N-1 (Leak Investigation)

29. Question Result, ID, References Sat, 114.114.LKRLSDETECTLK.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do procedures include instructions for personnel to detect leaks to help further reduce emission in stations and along the right of way?*

Assets Covered 88992 (115)

Result Notes O&M Section 2-D (Leak Surveys), Reg Station Inspection checklist has section to check for leaks, OQ task for gas leak investigation 192-1202

30. Question Result, ID, References Sat, 114.114.LKRLSIDMITRPR.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do procedures define a process to identify, classify, mitigate and repair leaks?*

Assets Covered 88992 (115)

Result Notes O&M Section 2-D-5 for leak grading, Section 2-P-6 Repair of Leaks

31. Question Result, ID, References Sat, 114.114.LKMITRPLAUF.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do procedures provide for review of Lost & Unaccounted for Gas (LAUF) and do procedures specify actions to reduce the associated volume?*

Assets Covered 88992 (115)

Result Notes Gas Manager maintains and unaccounted gas spreadsheet and validates the data monthly, should be less than 1%

O&M Section 2-N-10

32. Question Result, ID, References Sat, 114.114.REGSTATIONOM.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do maintenance or operational procedures contain measures for reduction of natural gas releases from regulators?*

Assets Covered 88992 (115)

Result Notes Reg Station Inspection checklist has section to check for leaks, OQ task for gas leak investigation 192-1202

33. Question Result, ID, References Sat, 114.114.REGSTATIONCONFIG.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do maintenance or operational procedures contain measures for identifying potential configuration changes that would reduce natural gas releases from regulators?*

Assets Covered 88992 (115)

Result Notes O&M Section 2-L-1(f)

34. Question Result, ID, References NA, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*

Assets Covered 88992 (115)

Result Notes The only relief valve was removed from the system in 2021

35. Question Result, ID, References Sat, 114.114.FLARE.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?*

Assets Covered 88992 (115)

Result Notes O&M Section 2-Q-2(k) allows for flaring when blowing down a pipeline, no permanent flare installed

36. Question Result, ID, References Sat, 114.114.GNLDSGNCNFG.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*

Assets Covered 88992 (115)

Result Notes O&M Section 2-L-1(f) for regulator stations

37. Question Result, ID, References Sat, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?*

Assets Covered 88992 (115)

Result Notes O&M Section 2-D (Leak surveys), 2-N-1 (Leak Investigation)

38. Question Result, ID, References Sat, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*

Assets Covered 88992 (115)

Result Notes O&M Section 2-D (Leak surveys), 2-N-1 (Leak Investigation)

39. Question Result, ID, References NA, 114.LEAKPRONE.LKMITGRPREXAMPLE.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?*

Assets Covered 88992 (115)

Result Notes Enumclaw does not have any of these pipe materials in their system

40. Question Result, ID, References Sat, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108(a) (also presented in: 114.GD)

Question Text *Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?*

Assets Covered 88992 (115)

Result Notes Enumclaw has replaced all unprotected steel and their DIMP plan has a process for replacing steel services and farm taps

DIMP Plan

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.