

Inspection Output (IOR)

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Report Filters

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

Results All

Inspection Information

Inspection Name	9001_City of Ellensburg_PA_2025	Operator(s)	ELLENSBURG GAS DEPT, CITY OF (4400)	Plan Submitted	01/25/2025
		Lead	Jason Hoxit	Plan Approval	01/28/2025 by Dennis Ritter
Status	LOCKED	Observer(s)	David Cullom, Anthony Dorrrough, Derek Norwood, Scott Anderson, John Trier, Marina Rathbun, Tom Green	All Activity Start	05/05/2025
Start Year	2025	Supervisor	Dennis Ritter	All Activity End	05/06/2025
System Type	GT	Director	Scott Rukke	Inspection Submitted	05/27/2025
Protocol Set ID	WA.GT.2024.02			Inspection Approval	06/27/2025 by Scott Rukke

Inspection Summary

Inspection Scope and Summary

This public awareness (PA) inspection for the City of Ellensburg's gas distribution system included reviewing procedures from the operator's operations and maintenance manual and reviewing the operator's records for years 2021-2024. The previous PA inspection was conducted on June 23, 2021, with no recommended follow-up actions.

Facilities visited and Total AFOD

Ellensburg City Hall - 501 N Anderson St. Ellensburg, WA, 98926. This inspection was 2 AFODs.

Summary of Significant Findings

(DO NOT Discuss Enforcement options)

There are two probable violations:

- 1) Maintaining records showing that an annual audit or review of its public awareness program was completed.
- 2) Meeting the baseline message delivery frequencies for the affected public.

Primary Operator contacts and/or participants

Darren Larsen, Gas Operations Supervisor, City of Ellensburg

Darin Yusi, Gas Engineer, City of Ellensburg

Heather Forgey, Engineering Specialist, City of Ellensburg

Operator executive contact and mailing address for any official correspondence

Heidi Behrends Cerniwey, City Manager, City of Ellensburg

Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1. 88964 (89)	City of Ellensburg	unit	88964	Compressor Stations Bottle/Pipe - Holders	46	46	46	46	100.0%

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

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

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	88964 (89)	--	PD	P, R, O, S	Detail	--

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directive s	Involved Groups/Subgroup s	Asset s	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1	Public Awareness	--	05/05/2025	--		all planned questions	all assets	all types	46	46	46	46	100.0%
			05/06/2025										

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	Public Awareness	COMPLETED	05/05/2025	Public Awareness	88964 (89)

Results (all values, 46 results)

54 (instead of 46) results are listed due to re-representation of questions in more than one sub-group.

EP.ERG: Emergency Response

1. Question Result, ID, Sat, EP.ERG.LIAISON.R, 192.603(b) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), References 192.616(c), 192.9(d), 192.9(e), ADB-2005-03) (also presented in: PD.PA)

Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, other public officials, and 911 emergency call centers?*

Assets Covered 88964 (89)

Result Notes Reviewed spreadsheets with established liaisons for appropriate fire, police, other public officials, and 911 emergency call centers for years 2021-2024.

MO.GO: Gas Pipeline Operations

2. Question Result, ID, [Sat, MO.GO.CONTSURVEILLANCE.P, 192.605\(e\) \(192.613\(a\), 192.613\(b\), 192.703\(b\), 192.703\(c\)\)](#) (also References presented in: MO.GOCLASS, PD.RW)
 Question Text *Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?*
 Assets Covered [88964 \(89\)](#)
 Result Notes [O&M Manual, Section 8.2 - Continuing Surveillance, Pages 4-5. O&M Manual, Section 8.2.1 - Scope, Subsection B, Page 4, is specific to reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition.](#)
3. Question Result, ID, [NA, MO.GO.CONTSURVEILLANCE.R, 192.709\(c\) \(192.613\(a\), 192.613\(b\), 192.703\(b\), 192.703\(c\)\)](#) (also References presented in: MO.GOCLASS, PD.RW)
 Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*
 Assets Covered [88964 \(89\)](#)
 Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)
4. Question Result, ID, [NA, MO.GO.CONTSURVEILLANCE.O, 192.613\(a\) \(192.613\(b\), 192.703\(a\), 192.703\(b\), 192.703\(c\)\)](#) (also References presented in: MO.GOCLASS, PD.RW)
 Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*
 Assets Covered [88964 \(89\)](#)
 Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)

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

5. Question Result, ID, [Sat, MO.RW.LEAKRECORDS.P](#), (also presented in: PD.RW)
 References
 Question Text *Does the operator have procedures to prepare and maintain gas leak records containing all information required by WAC 480-93-178?*
 Assets Covered [88964 \(89\)](#)
 Result Notes [O&M Manual, Section 10.4.6 - Leak Investigation, Subsection F, Pages 10-11, contain all information required by WAC 480-93-187. O&M Manual, Section 10, Appendix A, provides the form used for the Leak Investigation Report \(LIR\). O&M Manual, Section 10, Appendix B, provides the form used for the Leak Repair Report \(LRR\).](#)

PD.DP: Damage Prevention

6. Question Result, ID, [Sat, PD.DP.PDPROGRAM.P, 192.614\(a\)](#)
 References
 Question Text *Is a damage prevention program approved and in place?*
 Assets Covered [88964 \(89\)](#)
 Result Notes [O&M Manual, Section 14 - Public Awareness & Damage Prevention Program, Pages 4-23.](#)
7. Question Result, ID, [Sat, PD.DP.ONECALL.P, 192.614\(b\)](#)
 References
 Question Text *Does the process require participation in qualified one-call systems?*
 Assets Covered [88964 \(89\)](#)
 Result Notes [O&M Manual, Section 14.12 - Participation in a "One-Call" System, Page 15.](#)
8. Question Result, ID, [Sat, PD.DP.EXCAVATEMARK.P, 192.614\(c\)\(5\)](#)
 References
 Question Text *Does the process require marking proposed excavation sites to CGA Best Practices or use more stringent and accurate requirements?*
 Assets Covered [88964 \(89\)](#)
 Result Notes [O&M Manual, Section 8.10 - Locating, Pages 13-15. O&M Manual, Section 14.17 - Common Ground Alliance \(CGA\), Pages 19-20.](#)
9. Question Result, ID, [Sat, PD.DP.EXCAVATEMARK.R, 192.614\(c\)\(5\)](#)
 References

Question Text *Do records indicate that marking proposed excavation sites was completed within two business days and in accordance with RCW 19.122?*

Assets Covered 88964 (89)

Result Notes Reviewed numerous random locate tickets from 2021-2024 through ITIC from One-Call Concepts. All of the locates were performed within two business days and in accordance with RCW 19.122.

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 88964 (89)

Result Notes O&M Manual, Section 14.16 - Pipeline Association for Public Awareness (PAPA), Page 17.

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 88964 (89)

Result Notes O&M Manual, Section 10.6.3 - Reporting, Page 18. O&M Manual, Section 10, Appendix E - Damage Information Reporting Tool (DIRT) Form. O&M Manual, Section 14.17.1 - DIRT.

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 88964 (89)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. I observed City of Ellensburg create a mock ticket through ITIC and explain the process/response; however, this was not an actual ticket for the operator to process.

13. Question Result, ID, References Sat, PD.DP.PDPROGRAM.R, 192.614(c) (Appendix F to Part 112)

Question Text *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*

Assets Covered 88964 (89)

Result Notes Reviewed excavator information from One-Call Concepts for 2021-2024. This data includes all contractors that have created a locate ticket in Kittitas County during the previous year. Also reviewed the excavator information through PAPA, which looks up Washington State business licenses by codes related to excavation activities. Reviewed PAPA list for excavators and reviewed "Excavation Safety Guide & Directory" that is distributed annually. Reviewed other materials that are provided to excavators such as the "Guide to Safe Digging." Reviewed numerous locate tickets for 2021-2024.

Reviewed data in 2022 and 2024 for the affected public along the distribution system ([non-customer list](#)) and reviewed the content of newsletter that is distributed. The [non-customer list](#) is generated by pulling Kittitas County parcel data that is within a 100' buffer of the operator's pipeline boundary.

Bill inserts are distributed annually to electric/water/sewer customers that do not receive gas service. Reviewed that bill inserts are mailed out once a year for 2021-2024. Reviewed the bill inserts that were distributed in November 2022 and December 2024. The operator does not maintain an individual customer list for these City of Ellensburg utility customers without gas service but tracked when the bill inserts were distributed for years 2021-2024.

Bill inserts are distributed annually to gas customers. Reviewed that bill inserts are mailed out once a year for 2021-2024. Reviewed the bill inserts that were distributed in November 2022 and December 2024. The operator does not maintain an individual customer list for these City of Ellensburg gas customers but tracked when the bill inserts were distributed for years 2021-2024.

Reviewed PAPA list for emergency officials for 2021-2024 and reviewed "Pipeline Emergency Response Guidelines" booklet that is distributed in September of each year. Reviewed PAPA list for local public officials for 2021-2024 and reviewed "Pipeline Awareness" newsletter that is distributed in August of each year.

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 88964 (89)

Result Notes The City of Ellensburg operates a distribution pipeline and the code references for this question apply to transmission pipelines in Subpart O. However, the operator does require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments.

O&M Manual, Section 8.2 - Continuing Surveillance, Pages 4-5. O&M Manual, Section 9.1.4 - Abnormal Operating Conditions, Page 4. O&M Manual, Section 9.1.5 - Instructions, Pages 4-5. O&M Manual, Section 10.3 - Leak Surveys, Pages 5-7. O&M Manual, Section 10.4 - Leak Investigations, Pages 7-15. O&M Manual, Section 10 - Appendix A - Leak Investigation Report (LIR) Form. O&M Manual, Section 10 - Appendix B - Leak Repair Report (LRR) Form.

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 88964 (89)

Result Notes The City of Ellensburg operates a distribution pipeline and the code references for this question apply to transmission pipelines in Subpart O. However, the operator does maintain records that demonstrate critical damage prevention information is being gathered and recorded during pipeline patrols, leak surveys, and integrity assessments.

Reviewed numerous exposed pipe reports for 2021-2024 in ArcGIS Survey 123. Reviewed pipeline patrol records for 5 of the 15 patrol routes during 2021-2024. Reviewed Daily Leak Survey Reports, Leak Investigation Reports, and Leak Repair Reports for years 2021-2024.

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 88964 (89)

Result Notes O&M Manual, Section 10.6.3 - Reporting, Page 18.

17. Question Result, ID, References Sat, PD.DP.NOTICETOEXCAVATOR.R,

Question Text *Do records indicate that the operator provides the required information to excavators who damage pipeline facilities?*

Assets Covered 88964 (89)

Result Notes Reviewed third-party damages from 7/22/2022, 5/09/2023, 8/13/2024. In each example, the excavator was provided a "Guide to Safe Digging" and "Excavation Safety Guide and Directory," which satisfies the requirements of WAC 480-93-200(8).

I reviewed the entire process of a damaged pipeline facility with the operator and the records retained include cover sheet, work order, locate ticket, leak survey, LIR, LRR, material sheet, repair sheet, itemized damages, photos of damages, letter to excavator, a "Guide to Safe Digging," and "Excavation Safety Guide and Directory."

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 88964 (89)

Result Notes O&M Manual, Section 10.6.3 - Reporting, Subsection F, Page 18.

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 88964 (89)

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

20. Question Result, ID, References Sat, PD.DP.REBURIALINSPECT.R,

Question Text *When a third party exposes a pipeline owned by the operator, does the operator have a record showing they examined the pipeline for damage in the vicinity of the excavation?*

Assets Covered 88964 (89)

Result Notes Reviewed numerous exposed pipe reports from 2021-2024 in ArcGIS Survey 123.

PD.PA: Public Awareness

21. 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 **88964 (89)**
Result Notes **O&M Manual, Section 14.6 - Affected Facilities, Page 7. "All of the City of Ellensburg Gas Division's natural gas pipelines and facilities are included in this Public Awareness and Damage Prevention Program."**
22. 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 **88964 (89)**
Result Notes **O&M Manual, Section 14.7 - Stakeholder Audience Identification, Pages 7-8.**
23. 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 **88964 (89)**
Result Notes **O&M Manual, Section 14 - Public Awareness & Damage Prevention Program, Page 5, Letter of Management Support.**
24. 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 **88964 (89)**
Result Notes **O&M Manual, Section 14 - Public Awareness & Damage Prevention Program, Pages 4-23.**
25. 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 **88964 (89)**
Result Notes **Reviewed excavator information from One-Call Concepts for 2021-2024. This data includes all contractors that have created a locate ticket in Kittitas County during the previous year. Also reviewed the excavator information through PAPA, which looks up Washington State business licenses by codes related to excavation activities. Reviewed PAPA list for excavators and reviewed "Excavation Safety Guide & Directory" that is distributed annually. Reviewed other materials that are provided to excavators such as the "Guide to Safe Digging." Reviewed numerous locate tickets for 2021-2024.**
- Reviewed data in 2022 and 2024 for the affected public along the distribution system (non-customer list) and reviewed the content of newsletter that is distributed. The non-customer list is generated by pulling Kittitas County parcel data that is within a 100' buffer of the operator's pipeline boundary.**
- Bill inserts are distributed annually to electric/water/sewer customers that do not receive gas service. Reviewed that bill inserts are mailed out once a year for 2021-2024. Reviewed the bill inserts that were distributed in November 2022 and December 2024. The operator does not maintain an individual customer list for these City of Ellensburg utility customers without gas service but tracked when the bill inserts were distributed for years 2021-2024.**
- Bill inserts are distributed annually to gas customers. Reviewed that bill inserts are mailed out once a year for 2021-2024. Reviewed the bill inserts that were distributed in November 2022 and December 2024. The operator does not maintain an individual customer list for these City of Ellensburg gas customers but tracked when the bill inserts were distributed for years 2021-2024.**
- Reviewed PAPA list for emergency officials for 2021-2024 and reviewed "Pipeline Emergency Response Guidelines" booklet that is distributed in September of each year. Reviewed PAPA list for local public**

officials for 2021-2024 and reviewed "Pipeline Awareness" newsletter that is distributed in August of each year.

26. 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 **88964 (89)**
Result Notes **O&M Manual, Section 14.8 - Stakeholder Audience Message Type, Content, and Frequency, Pages 9-14.**
27. 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 **88964 (89)**
Result Notes **O&M Manual, Sections 14.8.1, 14.8.2, 14.8.3, 14.8.4 and 14.8.5 cover the supplemental frequencies and supplemental activities as described in API RP 1162. O&M Manual, Appendix B - Supplemental Events & Actions, Pages 1-4, includes additional program enhancements for years 2021-2024.**
28. Question Result, ID, References **Sat, PD.PA.EDUCATE.R, 192.616(d) (192.616(f))**
Question Text *Do records indicate delivered messages specifically included provisions to educate the public, emergency officials, local public officials, and excavators on the categories defined in §192.616(d)?*
Assets Covered **88964 (89)**
Result Notes **Reviewed newspaper add, Facebook posts, bill inserts, brochures, newsletters, and PAPA materials. All records satisfy the requirements of this question.**
29. 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 **88964 (89)**
Result Notes **The various messages developed and delivered advise appropriate stakeholder audiences of pipeline facilities.**
30. Question Result, ID, References **Unsat, 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 **88964 (89)**
Result Issue Summary **The operator did not send public awareness communications to the affected residents along the distribution system stakeholder audience in either 2021 or 2023. 49 CFR § 192.616(c) requires operators to follow the general program recommendations, including baseline and supplemental requirements of API RP 1162. API RP 1162, Table 2-2.1, provides an annual delivery frequency for affected residents along the local distribution system.**
- The operator did not send public awareness communications to its LDC customer stakeholder audience twice annually for 2021-2024, and instead delivered messages on an annual basis. 49 CFR § 192.616(c) requires operators to follow the general program recommendations, including baseline and supplemental requirements of API RP 1162. API RP 1162, Table 2-2.1, provides a twice annual delivery frequency for LDC customers.**
- Standard Issues **B1 (Moderate or small impact/widespread occurrence) : 192.616(c) : Documentation insufficient to demonstrate compliance with API RP 1162 Table 2-2 for natural gas distribution system operator**
- Result Notes **Affected Public - Residents along the Local Distribution System (LDC): Reviewed the non-customer distribution list for 2022 and 2024 for affected residents along the pipeline and reviewed the documentation that was provided. The non-customer list is generated by pulling Kittitas County parcel data that is within a 100' buffer of the operator's pipeline boundary. The non-customer list is for those that do not receive gas/electric/water/sewer service from the City of Ellensburg but are within a 100' buffer of the operator's pipeline boundary. The operator did not send public awareness communications to this stakeholder audience in either 2021 or 2023. The operator's O&M Manual, Section 14.8.1 - Affected Public - Residents Along the Distribution System, Page 10, provides a baseline frequency of "Every 2 Years" for "All Affected Public." API RP 1162, Table 2-2.1 - Affected Public, provides an annual delivery frequency for residents along the local distribution system.**

Affected Public - LDC Customers: Bill inserts are distributed annually to every City of Ellensburg electric/water/sewer/gas customer. Reviewed that bill inserts were mailed out once a year to LDC customers for 2021-2024. Reviewed the content in the bill inserts that were distributed in November 2022 and December 2024. The operator's O&M Manual, Section 14.8.1 - Affected Public - Residents Along the Distribution System, Page 10, provides a baseline frequency of "Annual" for "LDC Customers." API RP 1162, Table 2-2.1 - Affected Public, provides a twice annually delivery frequency for LDC customers.

Emergency Officials: Reviewed PAPA distribution list for emergency officials for 2021-2024 and reviewed "Pipeline Emergency Response Guidelines" booklet that was distributed in September of each year. The delivery frequency for emergency officials is in compliance with the operator's O&M Manual and API RP 1162.

Local Public Officials: Reviewed PAPA distribution list for local public officials for 2021-2024 and reviewed "Pipeline Awareness" newsletter that was distributed in August of each year. The annual delivery frequency for local public officials exceeds the 3-year baseline frequency found in the operator's O&M Manual and API RP 1162.

Excavators: Reviewed PAPA distribution list for excavators for 2021-2024 and reviewed "Excavation Safety Guide & Directory" that is distributed to excavators annually. The annual delivery frequency for excavators is in compliance with the operator's O&M Manual and API RP 1162.

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 88964 (89)
Result Notes O&M Manual, Section 14.9 - Development of Program Materials, Subsection D, Page 14.
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 88964 (89)
Result Notes Reviewed current and future brochures in Spanish that are made available at Ellensburg City Hall or by request.
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 88964 (89)
Result Notes O&M Manual, Section 14.19 - Measuring the Effectiveness of this Program, Page 20.
34. Question Result, ID, References Unsat, 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 88964 (89)
Result Issue Summary The operator did not maintain records showing that an annual audit or review of its public awareness program was completed in 2023. This is noted in the 2024 third-party audit performed by Q3 Integrated Solutions, LLC, as well as in the operator's O&M Manual, Section 14.19.3 - Third-Party Audit of Program, Page 23. 49 CFR § 192.616(i) requires that the operator's program documentation and evaluation results must be available for periodic review by appropriate regulatory agencies.
Standard Issues B2 (Moderate or small impact/limited occurrence) : 192.616(i) : Records indicate requirement not completed at required intervals.
Result Notes Reviewed operator's annual audit/review of program implementation according to the guidelines of API RP 1162. Reviewed the results of the WUTC regulatory inspection of the operator's public awareness program that was conducted in 2021. Reviewed the operator's internal Public Awareness Program Annual Audit Report for 2022. Reviewed the 2024 audit performed by Q3 Integrated Solutions, LLC. The "Gas Division Public Awareness Program Annual Audit Report" found in the operator's O&M Manual, Section 14, Appendix C, will be the document used for future annual audits/reviews.

The operator did not maintain records showing that an annual audit or review of its public awareness program was completed in 2023. This is noted in the 2024 audit performed by Q3 Integrated Solutions,

LLC, as well as in the operator's O&M Manual, Section 14.19.3 - Third-Party Audit of Program, Page 23. 49 CFR § 192.616(i) requires that the operator's program documentation and evaluation results must be available for periodic review by appropriate regulatory agencies.

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 **88964 (89)**
Result Notes **In 2021, the operator used the public awareness regulatory inspection conducted by UTC's Anthony Dorrough as its review. In 2022, the operator used an internal self-assessment method. In 2024, the operator used a third-party contractor to complete the annual audit.**
36. Question Result, ID, References **Sat, 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 **88964 (89)**
Result Notes **In 2021, the operator added Appendix A - Public Awareness Program Process Guide, Program History, and Damage Prevention Safety Metric Analysis to Section 14 of the O&M Manual.**

In 2023, the operator added Appendix B - Supplemental Events and Actions to the O&M Manual, Section 14.

In 2025, the operator added Appendix C - Public Awareness Program Annual Audit Form, and 2024 Supplemental Events & Actions to Section 14 of the O&M Manual.
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 **88964 (89)**
Result Notes **Reviewed Gas Overall Awareness Level (GOAL) Survey results for 2018-2022 (5-year average), 2023, and 2024.**
38. 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 **88964 (89)**
Result Notes **Reviewed Damage Prevention and Public Awareness Tracker data.**
39. 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 **88964 (89)**
Result Notes **Reviewed American Public Gas Association (APGA) Safety Awareness Study Reports for 2021-2022. Reviewed in-house survey reports for the 2023-2024.**
40. 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 **88964 (89)**
Result Notes **Reviewed survey results for the stakeholder audiences in 2023 and 2024. Reviewed American Public Gas Association (APGA) Safety Awareness Study Report for 2021-2022 for the stakeholder audiences. Each survey asks questions to evaluate the program effectiveness and whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited.**
41. 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 88964 (89)

Result Notes Reviewed Pipeline Safety Metrics for 2021-2024 for near-misses, excavation damages resulting in pipeline failures, and excavation damages that do not result in pipeline failures. Near-misses and excavation damages were higher in 2024 than in years 2021-2023.

42. Question Result, ID, References Sat, 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 88964 (89)

Result Notes Changes to the program are documented throughout numerous submissions to the UTC with redline edits in response to the program evaluation findings.

PD.SP: Special Permits

43. 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 88964 (89)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

44. 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 88964 (89)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

45. 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 88964 (89)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

46. 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 88964 (89)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

MO.GOCLASS: Gas Pipeline Class Location

47. Question Result, ID, References Sat, MO.GO.CONTSURVEILLANCE.P, 192.605(e) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also presented in: MO.GO, PD.RW)

Question Text *Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?*

Assets Covered 88964 (89)

Result Notes O&M Manual, Section 8.2 - Continuing Surveillance, Pages 4-5. O&M Manual, Section 8.2.1 - Scope, Subsection B, Page 4, is specific to reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition.

48. Question Result, ID, References NA, MO.GO.CONTSURVEILLANCE.R, 192.709(c) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also presented in: MO.GO, PD.RW)

Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*

Assets Covered 88964 (89)

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

49. Question Result, ID, [NA, MO.GO.CONTSURVEILLANCE.O, 192.613\(a\) \(192.613\(b\), 192.703\(a\), 192.703\(b\), 192.703\(c\)\)](#) (also References presented in: MO.GO, PD.RW)
Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*
Assets Covered [88964 \(89\)](#)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

PD.PA: Public Awareness

50. Question Result, ID, [Sat, EP.ERG.LIAISON.R, 192.603\(b\) \(192.615\(c\)\(1\), 192.615\(c\)\(2\), 192.615\(c\)\(3\), 192.615\(c\)\(4\), 192.616\(c\), 192.9\(d\), 192.9\(e\), ADB-2005-03\)](#) (also presented in: EP.ERG)
Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, other public officials, and 911 emergency call centers?*
Assets Covered [88964 \(89\)](#)
Result Notes Reviewed spreadsheets with established liaisons for appropriate fire, police, other public officials, and 911 emergency call centers for years 2021-2024.

PD.RW: ROW Markers, Patrols, Monitoring

51. Question Result, ID, [Sat, MO.GO.CONTSURVEILLANCE.P, 192.605\(e\) \(192.613\(a\), 192.613\(b\), 192.703\(b\), 192.703\(c\)\)](#) (also References presented in: MO.GO, MO.GOCLASS)
Question Text *Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?*
Assets Covered [88964 \(89\)](#)
Result Notes O&M Manual, Section 8.2 - Continuing Surveillance, Pages 4-5. O&M Manual, Section 8.2.1 - Scope, Subsection B, Page 4, is specific to reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition.
52. Question Result, ID, [NA, MO.GO.CONTSURVEILLANCE.R, 192.709\(c\) \(192.613\(a\), 192.613\(b\), 192.703\(b\), 192.703\(c\)\)](#) (also References presented in: MO.GO, MO.GOCLASS)
Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*
Assets Covered [88964 \(89\)](#)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
53. Question Result, ID, [NA, MO.GO.CONTSURVEILLANCE.O, 192.613\(a\) \(192.613\(b\), 192.703\(a\), 192.703\(b\), 192.703\(c\)\)](#) (also References presented in: MO.GO, MO.GOCLASS)
Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*
Assets Covered [88964 \(89\)](#)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
54. Question Result, ID, [Sat, MO.RW.LEAKRECORDS.P](#), (also presented in: MO.RW)
References
Question Text *Does the operator have procedures to prepare and maintain gas leak records containing all information required by WAC 480-93-178?*
Assets Covered [88964 \(89\)](#)
Result Notes O&M Manual, Section 10.4.6 - Leak Investigation, Subsection F, Pages 10-11, contain all information required by WAC 480-93-187. O&M Manual, Section 10, Appendix A, provides the form used for the Leak Investigation Report (LIR). O&M Manual, Section 10, Appendix B, provides the form used for the Leak Repair Report (LRR).

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

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