

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	9003_City of Enumclaw Gas Dept_PA_2025	Operator(s)	ENUMCLAW GAS DEPT, CITY OF (4500)	Plan Submitted	01/25/2025
Status	LOCKED	Lead	Jason Hoxit	Plan Approval	01/28/2025 by Dennis Ritter
Start Year	2025	Observer(s)	David Cullom, Anthony Dorrrough, Derek Norwood, Scott Anderson, John Trier, Marina Rathbun, Tom Green	All Activity Start	10/14/2025
System Type	GT	Director	Scott Rukke, Dennis Ritter	All Activity End	10/15/2025
Protocol Set ID	WA.GT.2024.02			Inspection Submitted	11/04/2025
				Inspection Approval	11/04/2025 by Dennis Ritter

Inspection Summary

Inspection Scope and Summary

This public awareness (PA) inspection for the City of Enumclaw's gas distribution system included reviewing operator procedures and records for years 2021-2024. The previous PA inspection was conducted on April 5, 2021, with no recommended follow-up actions.

Facilities visited and Total AFOD

The inspection was conducted remotely via Microsoft Teams.
2 AFODs

Summary of Significant Findings

(DO NOT Discuss Enforcement options)

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

Primary Operator contacts and/or participants

Nicholas Peelo, Gas Utility Manager, City of Enumclaw, (360) 615-5787, npeelo@ci.enumclaw.wa.us
A.J. Haas, Gas Engineer, City of Enumclaw, (360) 615-5674, ahaas@ci.enumclaw.wa.us

Operator executive contact and mailing address for any official correspondence

Jan Molinaro

Mayor

City of Enumclaw
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	Compressor Stations Bottle/Pipe - Holders Vault Gas Storage Field (Aboveground) Offshore	46	46	46	46	100.0%

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
				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.	88992 (115)	--	PD	P, R, O, S	Detail	--

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	Public Awareness	--	10/14/2025	--		all planned questions	all assets	all types	46	46	46	100.0%
2	Public Awareness	--	10/14/2025	--		all planned questions	all assets	all types	46	46	46	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	Public Awareness	COMPLETED	10/15/2025	Public Awareness	88992 (115)

Results (all values, 46 results)

54 (instead of 46) results are listed due to re-presentation 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 88992 (115)

Result Notes Reviewed public officials and emergency response lists for 2021-2024. Reviewed COE Manual 3 - Emergency Response, Appendix 3-J-2 - Public Agencies and Officials, Pages 1-2.

Reviewed a sample of letters sent to public officials and emergency contacts in 2021 and 2024 to maintain liaisons. These letters included: Mayor of the City of Enumclaw (9/9/21 and 9/10/24), Mayor of the City of Buckley (9/9/21 and 9/10/24), Muckleshoot Indian Tribe (9/9/21 and 9/10/24), City of Enumclaw Fire Dept (9/10/21 and 9/11/24), City of Enumclaw Police Dept (9/10/21 and 9/11/24), City of Buckley Fire Dept (9/10/21 and 9/11/24), and City of Buckley Police Dept (9/10/21 and 9/11/24).

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 **88992 (115)**
Result Notes **COE Manual 2 - Operations and Maintenance, Procedure 2-C - Continuing Surveillance, Sections 1(a) and 9(b), Page 1.**
COE Manual 1 - Pipeline Safety - General, Procedure 1-B - Pipeline Safety Policy, Section 5(e), Page 3.
3. Question Result, ID, **Sat, 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 **88992 (115)**
Result Notes **Reviewed patrolling and leak survey records in FlowGIS for 2021-2024, including HOA/HOS (High Occupancy Areas/High Occupancy Structures) maps. No issues found. No pipeline segment was determined to be in unsatisfactory condition that resulted in the reconditioning, phasing out, or reducing the MAOP of that segment.**
4. Question Result, ID, **Sat, 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 **88992 (115)**
Result Notes **Reviewed patrolling and leak survey records in FlowGIS for 2021-2024, including HOA/HOS (High Occupancy Areas/High Occupancy Structures) maps. The City of Enumclaw found 7 leaks during leak surveys in 2024, 5 in 2023, 2 in 2022, and 7 in 2021; and the operator made timely repairs in accordance with Manual 2 - Operations and Maintenance, Procedure 2-D - Patrols and Leak Surveys. No pipeline segment was determined to be in unsatisfactory condition that resulted in the reconditioning, phasing out, or reducing the MAOP of that segment. No extreme weather event or natural disaster occurred that could potentially damage pipeline facilities.**

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 **88992 (115)**
Result Notes **COE Manual 2 - Operations and Maintenance, Procedure 2-P - Pipeline Repairs, Section 8 - Records, Page 8. The gas leak records are contained within FlowGIS using the collect a leak found form and subsequent leak repair form, which contains all data required in WAC 480-93-187.**

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 **88992 (115)**
Result Notes **COE Manual 2 - Operations and Maintenance, Procedure 2-G - Damage Prevention, Pages 1-7.**

7. 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 **88992 (115)**
 Result Notes **COE Manual 2 - Operations and Maintenance, Procedure 2-G - Damage Prevention, Section 2(b), Page 1.**
8. 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 **88992 (115)**
 Result Notes **COE Manual 2 - Operations and Maintenance, Procedure 2-G - Damage Prevention, Section 4.5 - Responding to One-Call, Page 4.**
9. Question Result, ID, References **Sat, PD.DP.EXCAVATEMARK.R, 192.614(c)(5)**
 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 **88992 (115)**
 Result Notes **Reviewed a large sample of locate tickets (including emergency locates) for 2021-2024. Every locate was completed 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 **88992 (115)**
 Result Notes **COE Manual 2 - Operations and Maintenance, Procedure 2-G - Damage Prevention, Section 4.1 - Maintaining Excavator Contacts, Page 2.**
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 **88992 (115)**
 Result Notes **COE Manual 2 - Operations and Maintenance, Procedure 2-G - Damage Prevention, Section 6 - Inspection of Pipeline, Page 6.**
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 **88992 (115)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review; however, the operator walked me through the process of processing a locate ticket through the Utilisync app.**
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 **88992 (115)**
 Result Notes **Reviewed list of excavators who normally engage in excavation activities in the vicinity for 2021-2024. The operator's damage prevention program meets the minimum requirements specified in 192.614(c).**
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 **88992 (115)**
 Result Notes **COE Manual 6 - DIMP, Procedure 6-A - Distribution Integrity Management Plan, Chapter 3 - Knowledge of System, Page 3.**
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 88992 (115)

Result Notes Reviewed patrol and leak survey records in FlowGIS for 2021-2024. Reviewed Manual 2 - Operations and Maintenance, Procedure 2-C - Continuing Surveillance. Reviewed Manual 2 - Operations and Maintenance, Procedure 2-D - Patrols and Leak Surveys. Records demonstrate that critical damage prevention information is being gathered and recorded.

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 88992 (115)

Result Notes COE Manual 2 - Operations and Maintenance, Procedure 2-G - Damage Prevention, Section 6 - Inspection of Pipeline, Subsections 6(e) through 6(h), Page 6. Reviewed Appendix 2-G-6 for sample letter sent to excavator, which contains the information required by WAC 480-93-200(8).

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 88992 (115)

Result Notes Reviewed emails from 2021-2024 that were sent to excavators who damaged pipeline facilities. In the emails, the City of Enumclaw provides links for DIRT report, information for filing a complaint with safety committee, references to relevant WACs and RCWs, directs excavators to www.digsafeWA.com, and offers dig safe trainings.

18. Question Result, ID, References NA, 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 88992 (115)

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

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 88992 (115)

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

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 88992 (115)

Result Notes Reviewed "Collect 4-E-1 Construction inspection" forms and FlowGIS for 2021-2024. No issues.

The process is found in COE Manual 2 - Operations and Maintenance, Procedure 2-G - Damage Prevention, Section 4.5 - Responding to One-Call, Page 5.

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 88992 (115)

Result Notes COE Manual 7 - Public Awareness, Procedure 7-A - Public Awareness Program - General, Section 5 - Pipeline Assets Included in Program, Page 2. COE Manual 1 - Pipeline Safety - General, Procedure 1-C - System Descriptions, Section 1 - Items Not Present in City of Enumclaw System, Pages 1-3.

22. Question Result, ID, References Sat, PD.PA.AUDIENICEID.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 88992 (115)
- Result Notes COE Manual 7 - Public Awareness, Procedure 7-B - Audiences and Messages, Section 2 - Stakeholder Audiences, Pages 1-2.
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 88992 (115)
- Result Notes COE Manual 7 - Public Awareness, Procedure 7-A - Public Awareness Program - General, Section 3 - Management Support, Page 2. Reviewed Resolution No. 1411, which demonstrates 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 88992 (115)
- Result Notes COE Manual 7 - Public Awareness, Procedure 7-A - Public Awareness Program - General, Section 1 - Public Awareness Manual, Page 1.
- COE Manual 7 - Public Awareness, Procedure 7-A - Public Awareness Program - General, Section 2 - Program Objectives, Pages 1-2.
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 88992 (115)
- Result Notes Reviewed lists for excavators, emergency responders, affected public (gas customers), affected public within 600 feet of pipeline (non-gas customers), and public officials for 2021-2024.
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 88992 (115)
- Result Notes COE Manual 7 - Public Awareness, Appendix 7-B-1 - Summary of Communications, Pages 1-4.
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 88992 (115)
- Result Notes COE Manual 7 - Public Awareness, Procedure 7-C - Supplemental Program Enhancements, Page 1. Supplemental enhancements are considered on an annual basis when the program is reviewed.
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 88992 (115)
- Result Notes Reviewed the 2021-2024 mailers that were sent to the affected public (both gas customers and non-gas customers), emergency responders, excavators, and public officials (sent annually even though API 1162 and manual require every 3 years). The mailers contained the information required in 192.616(d).
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 88992 (115)

Result Notes Reviewed mailers that were distributed to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations. The operator's records showed these were distributed to Enumclaw School District, Enumclaw Mayor, Enumclaw City Administrator, Buckley Mayor, Buckley City Administrator, Auburn Mayor, etc.

30. 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 88992 (115)

Result Notes Reviewed the Public Awareness Program Effectiveness reports for 2022-2025 (CY 2021-2024). The operator meets the baseline delivery frequencies for LDC customers, emergency officials, and excavators; and exceeds the baseline delivery frequencies for residents along the LDC (delivers twice annually) and public officials (delivers annually).

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 88992 (115)

Result Notes COE Manual 7 - Public Awareness, Procedure 7-A - Public Awareness Program - General, Section 7 - Language, Page 3.

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

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

Assets Covered 88992 (115)

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

COE Manual 7 - Public Awareness, Procedure 7-A - Public Awareness Program - General, Section 7 - Language, Page 3, states, "There are no areas that the pipeline traverses that are considered concentrations of non-English speaking populations. If the state or city census data changes indicating areas within the pipeline boundary are considered concentrations of non-English speaking populations. The city will revise the public awareness program to reflect those populations"

The 2020 Census was the last census and the operator will review data from the 2030 Census.

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 88992 (115)

Result Notes COE Manual 7 - Public Awareness, Procedure 7-E - Program Evaluation, Pages 1-4.

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 88992 (115)

Result Notes Reviewed Annual Review of Public Awareness Program Effectiveness for 2021-2024. The reviews were completed annually on 11/17/22, 9/08/23, 9/10/24, and 10/09/25.

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 88992 (115)

Result Notes The City of Enumclaw performs an internal assessment to complete the annual audit for program implementation.

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 88992 (115)

Result Notes The City of Enumclaw added an online survey in 2022 through SurveyMonkey (including adding QR codes) to increase participation.

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 88992 (115)

Result Notes Reviewed Annual Review of Public Awareness Program Effectiveness for 2021-2024. Reviewed Public Awareness Program Effectiveness - 4 Year Review for years 2021-2024 (prior program effectiveness evaluation covered years 2017-2021).

Reviewed evaluation comparing 2021-2024 responses to public awareness questions to 2017-2021 response data; reviewed stakeholder-specific evaluations; and reviewed program effectiveness determinations for all stakeholder audiences. During the 2021-2024 review period, outreach, understanding, and desired behavior all improved.

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 88992 (115)

Result Notes The operator tracked program outreach for all stakeholder audiences from 2021-2024.

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 88992 (115)

Result Notes Reviewed program implementation and program effectiveness evaluations for 2021-2024. The percentage of stakeholders that understood and retained the key information from the operator's public awareness messages was determined in the evaluations.

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 88992 (115)

Result Notes Reviewed program implementation and program effectiveness evaluations for 2021-2024. The operator evaluated whether appropriate preventative, response, and mitigative behaviors were understood and likely to be exhibited in the evaluations.

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 88992 (115)

Result Notes COE Manual 7 - Public Awareness, Procedure 7-E - Program Evaluation, Section 6 - Measuring Program Effectiveness, Pages 3-4. This notes that "Enumclaw's piping systems are so small that this may not be a valid measure. A telephone, mail, online, or in-person survey will be used to help determine this measure. Other information may also be used."

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 88992 (115)

Result Notes As a result of an annual program implementation evaluation, the City of Enumclaw added an online survey in 2022 through SurveyMonkey (including adding QR codes) to increase participation. In 2025, the operator implemented a prize drawing for a bill credit after completing public awareness survey to incentivize participation.

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 **88992 (115)**
Result Notes **No such event occurred, or condition 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 **88992 (115)**
Result Notes **No such event occurred, or condition 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 **88992 (115)**
Result Notes **No such event occurred, or condition 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 **88992 (115)**
Result Notes **No such event occurred, or condition 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 **88992 (115)**
Result Notes **COE Manual 2 - Operations and Maintenance, Procedure 2-C - Continuing Surveillance, Sections 1(a) and 9(b), Page 1.**
COE Manual 1 - Pipeline Safety - General, Procedure 1-B - Pipeline Safety Policy, Section 5(e), Page 3.
48. Question Result, ID, References **Sat, 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 **88992 (115)**
Result Notes **Reviewed patrolling and leak survey records in FlowGIS for 2021-2024, including HOA/HOS (High Occupancy Areas/High Occupancy Structures) maps. No issues found. No pipeline segment was determined to be in unsatisfactory condition that resulted in the reconditioning, phasing out, or reducing the MAOP of that segment.**
49. Question Result, ID, References **Sat, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c))** (also 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 **88992 (115)**
Result Notes **Reviewed patrolling and leak survey records in FlowGIS for 2021-2024, including HOA/HOS (High Occupancy Areas/High Occupancy Structures) maps. The City of Enumclaw found 7 leaks during leak**

surveys in 2024, 5 in 2023, 2 in 2022, and 7 in 2021; and the operator made timely repairs in accordance with Manual 2 - Operations and Maintenance, Procedure 2-D - Patrols and Leak Surveys. No pipeline segment was determined to be in unsatisfactory condition that resulted in the reconditioning, phasing out, or reducing the MAOP of that segment. No extreme weather event or natural disaster occurred that could potentially damage pipeline facilities.

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),**
References **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 **88992 (115)**

Result Notes **Reviewed public officials and emergency response lists for 2021-2024. Reviewed COE Manual 3 - Emergency Response, Appendix 3-J-2 - Public Agencies and Officials, Pages 1-2.**

Reviewed a sample of letters sent to public officials and emergency contacts in 2021 and 2024 to maintain liaisons. These letters included: Mayor of the City of Enumclaw (9/9/21 and 9/10/24), Mayor of the City of Buckley (9/9/21 and 9/10/24), Muckleshoot Indian Tribe (9/9/21 and 9/10/24), City of Enumclaw Fire Dept (9/10/21 and 9/11/24), City of Enumclaw Police Dept (9/10/21 and 9/11/24), City of Buckley Fire Dept (9/10/21 and 9/11/24), and City of Buckley Police Dept (9/10/21 and 9/11/24).

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 **88992 (115)**

Result Notes **COE Manual 2 - Operations and Maintenance, Procedure 2-C - Continuing Surveillance, Sections 1(a) and 9(b), Page 1.**

COE Manual 1 - Pipeline Safety - General, Procedure 1-B - Pipeline Safety Policy, Section 5(e), Page 3.

52. Question Result, ID, **Sat, 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 **88992 (115)**

Result Notes **Reviewed patrolling and leak survey records in FlowGIS for 2021-2024, including HOA/HOS (High Occupancy Areas/High Occupancy Structures) maps. No issues found. No pipeline segment was determined to be in unsatisfactory condition that resulted in the reconditioning, phasing out, or reducing the MAOP of that segment.**

53. Question Result, ID, **Sat, 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 **88992 (115)**

Result Notes **Reviewed patrolling and leak survey records in FlowGIS for 2021-2024, including HOA/HOS (High Occupancy Areas/High Occupancy Structures) maps. The City of Enumclaw found 7 leaks during leak surveys in 2024, 5 in 2023, 2 in 2022, and 7 in 2021; and the operator made timely repairs in accordance with Manual 2 - Operations and Maintenance, Procedure 2-D - Patrols and Leak Surveys. No pipeline segment was determined to be in unsatisfactory condition that resulted in the reconditioning, phasing out, or reducing the MAOP of that segment. No extreme weather event or natural disaster occurred that could potentially damage pipeline facilities.**

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 88992 (115)

Result Notes COE Manual 2 - Operations and Maintenance, Procedure 2-P - Pipeline Repairs, Section 8 - Records, Page 8. The gas leak records are contained within FlowGIS using the collect a leak found form and subsequent leak repair form, which contains all data required in WAC 480-93-187.

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.