

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 | 9014_Klickitat PUD_PA_2025 | Operator(s) | KLICKITAT PUBLIC UTILITY DISTRICT (39809) | Plan Submitted | 02/08/2025 |
| | | Lead | Jason Hoxit | Plan Approval | 02/11/2025 by Dennis Ritter |
| Status | LOCKED | Observer(s) | David Cullom, Anthony Dorrough, Derek Norwood, Scott Anderson, John Trier, Marina Rathbun, Tom Green | All Activity Start | 10/08/2025 |
| Start Year | 2025 | Director | Scott Rukke, Dennis Ritter | All Activity End | 10/09/2025 |
| System Type | GT | | | Inspection Submitted | 11/18/2025 |
| Protocol Set ID | WA.GT.2024.02 | | | Inspection Approval | 11/18/2025 by Dennis Ritter |

Inspection Summary

Inspection Scope and Summary

This public awareness inspection for Klickitat PUD's RNG system included reviewing records, operations and maintenance procedures, public awareness and damage prevention procedures and activities, and emergency response procedures for 2021-2024. The previous public awareness inspection was conducted on October 7, 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 two violations as a result of the inspection:

CFR 192.614(c)(5) - Failing to provide temporary marking of buried pipelines in the area of excavation activity before the activity begins.

RCW 19.122.030(4)(a) - Failing to provide information to excavator before work-to-begin date on notice.

Primary Operator contacts and/or participants

Melanie Osborne, Landfill Gas Support Assistant, (509) 773-7427, MOsborne@klickpud.com

Doug Erickson, Compliance Program Manager, (719) 639-6639, doug.erickson@everlineus.com

Alex Casimiro, Auxiliary Operator, (509) 773-7428, acasimiro@klickpud.com

Operator executive contact and mailing address for any official correspondence

Gwyn Miller

General Manager

Klickitat PUD

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Scope (Assets)

| # | Short Name | Long Name | Asset Type | Asset IDs | Excluded Topics | Planned | Required | Inspected | Total | Required % Complete |
|----|---------------|---------------|------------|-----------|--|---------|----------|-----------|-------|---------------------|
| 1. | 88970 (1,934) | Klickitat PUD | unit | 88970 | Compressor Stations Bottle/Pipe - Holders Vault Gas Storage Field (Aboveground) Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric AMAOP CDA | 46 | 46 | 46 | 46 | 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. | 88970 (1,934) | -- | PD | P, R, O, S | Detail | -- |

Plan Implementations

| # | Activity Name | SMART Act# | Start Date | End Date | Focus Directives | Involved Groups/Subgroups | Assets | Qst Type(s) | Planned | Required | Inspected | Total | Required % Complete |
|---|------------------|------------|------------|----------|------------------|---------------------------|------------|-------------|---------|----------|-----------|-------|---------------------|
| 1 | Public Awareness | -- | 10/08/2025 | -- | | all planned questions | all assets | all types | 46 | 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 | 10/30/2025 | Public Awareness | 88970 (1,934) |

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

- 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 88970 (1,934)

Result Notes Reviewed Form F-36 - Documenting First Responder Liaison Efforts for 2021. Reviewed 2021 emails sent to emergency responders with KPUD's public awareness plan attached. Reviewed public officials and emergency officials lists for 2022-2024. Reviewed Bickleton/Roosevelt FD site visit documentation for 2025. Reviewed local emergency officials list in KPUD's ERP, Section 19.14 - Local Emergency Officials, Page 19-13.

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 88970 (1,934)

Result Notes KPUD OMM, Section 8.3 - Continuing Surveillance 192.613, Pages 8-4 and 8-5.

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 88970 (1,934)

Result Notes KPUD did not recondition, phase out, or reduce the MAOP in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed.

Reviewed walking patrol records for 2021-2024. KPUD used Form F-17 - Pipeline Patrol Report during 2021-2022 and used Form 3(a) - Pipeline Patrol during 2023-2024. No AOCs, no new structures, no erosion, no construction activity, and no SRCs were observed during patrols.

Reviewed Form 3(b) - Leakage Survey records for 2022-2024. No leaks were detected on Pipeline A or B in any leak survey.

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 88970 (1,934)

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 88970 (1,934)

Result Notes KPUD OMM, Section 7.12 - Gas Leak Records WAC 480-93-287, Page 7-14.

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 88970 (1,934)

Result Notes KPUD OMM, Section 18 - Damage Prevention, Pages 18-1 through 18-11.

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 88970 (1,934)

Result Notes KPUD OMM, Section 18.1 - One Call System 192.614, Page 18-1.

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 88970 (1,934)

Result Notes KPUD OMM, Section 18.4 - Temporary Marking of Pipelines, Pages 18-5 and 18-6.

9. Question Result, ID, References Unsat, 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 88970 (1,934)

Result Issue Summary The operator did not have records for five locate tickets (21456948, 22100071, 23031524, 24001939, 24166199) that were found on ITIC website during 2021-2024 for which KPUD was a notified member. The results in ITIC for KPUD on these tickets show "Does not report."

The operator failed to respond to four locate tickets (24284440, 24284441, 24284442, 24284443) in 2024.

192.614(c)(5) requires operators to provide temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.

RCW 19.122.030(4)(a) requires operators to provide information to an excavator no later than the work-to-begin date on the notice, unless otherwise agreed by written agreement between the facility operator and excavator.

Standard Issues B1 (Moderate or small impact/widespread occurrence) : 192.614(c)(5) : No record/documentation.
B1 (Moderate or small impact/widespread occurrence) : 192.614(c)(5) : Documentation does not demonstrate adequate implementation of operator's process.
B1 (Moderate or small impact/widespread occurrence) : 192.614(c)(5) : Records indicate requirement not completed at required intervals.

Result Notes Reviewed email pertaining to KPUD locate ticket 21310407 in 2021. Roy Rogers of Cathodic Protection Engineering described that he notified excavator that the road grading project would not be an issue with KPUD's pipeline facilities. Roy Rogers responded to the excavator within two business days.

Searched One Call Concepts ITIC website (ITIC) for locate tickets during 2021-2024 and found tickets 21456948 (2021), 22100071 (2022), 23031524 (2023), 24001939 (2024), and 24166199 (2024) that KPUD was a notified member of but did not have records of. The status for all these tickets on ITIC shows "Does not report," and the proposed excavation sites were in the vicinity of KPUD's pipeline.

Reviewed KPUD's ITIC records for 2024 locate tickets: 24284440, 24284441, 24284442, and 24284443. The operator failed to respond to all four tickets, and the status on ITIC shows "Not yet responded."

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 88970 (1,934)

Result Notes KPUD OMM, Section 18.1 - One Call System 192.614, Page 18-1. KPUD PAP, Section 5.2 - Third-Party Vendors Used to Identify Stakeholders, Page 5-1.

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 88970 (1,934)

Result Notes KPUD OMM, Section 18.1 - One Call System 192.614, Page 18-1. KPUD OMM, Section 18.10 - Damage Reporting WAC 480-93-200, Page 18-10.

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 88970 (1,934)

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

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 88970 (1,934)
Result Notes KPUD OMM, Section 18 - Damage Prevention, Pages 18-1 through 18-11. KPUD PAP.
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 88970 (1,934)
Result Notes KPUD OMM, Section 8.3 - Continuing Surveillance 192.613, Pages 8-4 and 8-5.
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 88970 (1,934)
Result Notes Reviewed walking patrol records for 2021-2024. KPUD used Form F-17 - Pipeline Patrol Report during 2021-2022 and used Form 3(a) - Pipeline Patrol during 2023-2024. Roy Rogers with Catholic Protection Engineering conducted patrols during 2021-2022. Eric Larson with Everline conducted patrols during 2023-2024. No AOCs, no new structures, no erosion, no construction activity, and no SRCs were observed during patrols.

Reviewed Form F-17 - Pipeline Patrol Report and Form 3(b) - Leakage Survey records for 2022-2024. Roy Rogers conducted leak surveys using calibrated Health DP III in 2022, and Eric Larson and Jonathan Lemon conducted leak surveys using calibrated Heath DP-IR in 2022 and calibrated Heath RMLD in 2023-2024. No leaks were detected on Pipeline A or B in any leak survey.
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 88970 (1,934)
Result Notes KPUD OMM, Section 18.10 - Damage Reporting WAC 480-93-200, Page 18-10.
17. Question Result, ID, References NA, PD.DP.NOTICETOEXCAVATOR.R,
Question Text *Do records indicate that the operator provides the required information to excavators who damage pipeline facilities?*
Assets Covered 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
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 88970 (1,934)
Result Notes KPUD OMM, Section 18.10 - Damage Reporting WAC 480-93-200, Page 18-10.
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 88970 (1,934)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
20. Question Result, ID, References NA, 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 88970 (1,934)

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

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 **88970 (1,934)**
Result Notes **KPUD PAP, Section 4.1 - Pipeline System(s) Description, Page 4-1.**
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 **88970 (1,934)**
Result Notes **KPUD PAP, Section 5 - Stakeholders, Pages 5-1 through 5-4.**
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 **88970 (1,934)**
Result Notes **KPUD PAP, Section 1.5 - Management Commitment & Support, Page 1-4.**
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 **88970 (1,934)**
Result Notes **KPUD OMM, Section 18.5 - Public Education 192.616, Page 18-7. KPUD PAP, Sections 1-10.**
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 **88970 (1,934)**
Result Notes **Reviewed 2022-2024 Public Awareness Campaign Reports, mailers, and associated mailing lists. The operator identifies the affected stakeholder audience groups.**
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 **88970 (1,934)**
Result Notes **KPUD PAP, Section 8.4 - Frequency and Documentation of Message Delivery, Page 8-3.**
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 **88970 (1,934)**
Result Notes **KPUD PAP, Section 9.8 - Supplemental Enhancements, Pages 9-7 through 9-10.**
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 **88970 (1,934)**

- Result Notes Reviewed the mailers delivered to the stakeholder audience groups for 2022-2024. Reviewed the mailing lists for the affected stakeholder audience groups. The delivered messages satisfy the requirements of 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 88970 (1,934)
 Result Notes The mailers directed affected stakeholder audiences to NPMS.
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 88970 (1,934)
 Result Notes Reviewed 2022-2024 Public Awareness Campaign Reports. Public awareness mailers were sent annually on 12/10/2024, 10/19/2023, and 12/01/2022 to emergency officials, public officials, and excavators. The annual delivery to public officials exceeds the 3-year baseline frequency specified in Table 2-1 of API RP 1162. There are no affected public along the operator's pipeline; however, on 12/01/2022, the operator sent 107 mailers to the residents of Roosevelt, WA.
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 88970 (1,934)
 Result Notes KPUD PAP, Section 6.2 - Language, Page 6-1.
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 88970 (1,934)
 Result Notes Reviewed 2022-2024 public awareness mailers that were developed in both English and Spanish for the four stakeholder audience groups.
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 88970 (1,934)
 Result Notes KPUD PAP, Section 9.7 - Monitoring Program Effectiveness, Page 9-6.
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 88970 (1,934)
 Result Notes Reviewed 2021 self-assessment. Reviewed 2022-2024 annual reviews of the public awareness program conducted by Everline, which documents that the program has been implemented and documented according to KPUD's PAP.

 Reviewed KPUD PAP, Section 10, Form 1 - Pipeline Public Awareness Program Review Log, Page 10-2. Reviewed KPUD PAP, Section 10, Form 2 - Public Awareness Program Revision Log, Page 10-3. The PAP was reviewed annually since it was prepared by Everline in 2022.
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 88970 (1,934)

- Result Notes KPUD used EverLine (3rd-party contractor review) to complete the annual review of program implementation from 2022-2024.
36. Question Result, ID, References NA, PD.PA.PROGRAMIMPROVE.R, 192.616(c) (API RP 1162 Section 8.3)
 Question Text *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?*
 Assets Covered 88970 (1,934)
 Result Notes No such event occurred, or condition existed, in the scope of inspection review. No changes were recommended based on the annual audits.
37. Question Result, ID, References NA, 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 88970 (1,934)
 Result Notes No such event occurred, or condition existed, in the scope of inspection review. KPUD's annual review states, "KPUD's Public Awareness Program [with Everline] was implemented in 2022 and the effectiveness will be evaluated after the completion of the fourth year." This decision was made so that Everline has four years worth of data to evaluate program effectiveness.
38. Question Result, ID, References NA, PD.PA.MEASUREOUTREACH.R, 192.616(c) (API RP 1162 Section 8.4.1)
 Question Text *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?*
 Assets Covered 88970 (1,934)
 Result Notes No such event occurred, or condition existed, in the scope of inspection review. KPUD's annual review states, "KPUD's Public Awareness Program [with Everline] was implemented in 2022 and the effectiveness will be evaluated after the completion of the fourth year." This decision was made so that Everline has four years worth of data to evaluate program effectiveness.
39. Question Result, ID, References NA, PD.PA.MEASUREUNDERSTANDABILITY.R, 192.616(c) (API RP 1162 Section 8.4.2)
 Question Text *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?*
 Assets Covered 88970 (1,934)
 Result Notes No such event occurred, or condition existed, in the scope of inspection review. KPUD's annual review states, "KPUD's Public Awareness Program [with Everline] was implemented in 2022 and the effectiveness will be evaluated after the completion of the fourth year." This decision was made so that Everline has four years worth of data to evaluate program effectiveness.
40. Question Result, ID, References NA, PD.PA.MEASUREBEHAVIOR.R, 192.616(c) (API RP 1162 Section 8.4.3)
 Question Text *In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?*
 Assets Covered 88970 (1,934)
 Result Notes No such event occurred, or condition existed, in the scope of inspection review. KPUD's annual review states, "KPUD's Public Awareness Program [with Everline] was implemented in 2022 and the effectiveness will be evaluated after the completion of the fourth year." This decision was made so that Everline has four years worth of data to evaluate program effectiveness.
41. Question Result, ID, References NA, PD.PA.MEASUREBOTTOM.R, 192.616(c) (API RP 1162 Section 8.4.4)
 Question Text *Were bottom-line results of the program measured by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures?*
 Assets Covered 88970 (1,934)
 Result Notes No such event occurred, or condition existed, in the scope of inspection review. KPUD's annual review states, "KPUD's Public Awareness Program [with Everline] was implemented in 2022 and the effectiveness will be evaluated after the completion of the fourth year." This decision was made so that Everline has four years worth of data to evaluate program effectiveness. KPUD's annual review also documents that there were no incidents or near misses during the evaluation period.
42. Question Result, ID, References NA, PD.PA.CHANGES.R, 192.616(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)

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

Assets Covered 88970 (1,934)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. No changes were recommended based on the annual audits.

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 88970 (1,934)

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 88970 (1,934)

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 88970 (1,934)

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 88970 (1,934)

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 88970 (1,934)

Result Notes KPUD OMM, Section 8.3 - Continuing Surveillance 192.613, Pages 8-4 and 8-5.

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 88970 (1,934)

Result Notes KPUD did not recondition, phase out, or reduce the MAOP in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed.

Reviewed walking patrol records for 2021-2024. KPUD used Form F-17 - Pipeline Patrol Report during 2021-2022 and used Form 3(a) - Pipeline Patrol during 2023-2024. No AOCs, no new structures, no erosion, no construction activity, and no SRCs were observed during patrols.

Reviewed Form 3(b) - Leakage Survey records for 2022-2024. No leaks were detected on Pipeline A or B in any leak survey.

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 [88970 \(1,934\)](#)
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\(c\)\(4\)](#),
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 [88970 \(1,934\)](#)
Result Notes [Reviewed Form F-36 - Documenting First Responder Liaison Efforts for 2021. Reviewed 2021 emails sent to emergency responders with KPUD's public awareness plan attached. Reviewed public officials and emergency officials lists for 2022-2024. Reviewed Bickleton/Roosevelt FD site visit documentation for 2025. Reviewed local emergency officials list in KPUD's ERP, Section 19.14 - Local Emergency Officials, Page 19-13.](#)

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 [88970 \(1,934\)](#)
Result Notes [KPUD OMM, Section 8.3 - Continuing Surveillance 192.613, Pages 8-4 and 8-5.](#)
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 [88970 \(1,934\)](#)
Result Notes [KPUD did not recondition, phase out, or reduce the MAOP in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed.](#)

[Reviewed walking patrol records for 2021-2024. KPUD used Form F-17 - Pipeline Patrol Report during 2021-2022 and used Form 3\(a\) - Pipeline Patrol during 2023-2024. No AOCs, no new structures, no erosion, no construction activity, and no SRCs were observed during patrols.](#)

[Reviewed Form 3\(b\) - Leakage Survey records for 2022-2024. No leaks were detected on Pipeline A or B in any leak survey.](#)
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 [88970 \(1,934\)](#)
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 [88970 \(1,934\)](#)
Result Notes [KPUD OMM, Section 7.12 - Gas Leak Records WAC 480-93-287, Page 7-14.](#)

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.