

# 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 [8779] Enumclaw D&A	Operator(s) ENUMCLAW GAS DEPT, CITY OF (4500) Lead Derek Norwood	Plan Submitted 07/20/2024 Plan Approval 07/22/2024 by Dennis Ritter
Status LOCKED	Observer(s) David Cullom, Lex Vinsel, Anthony Dorrough, Scott Anderson, John Trier, Marina Rathbun, Jason Hoxit	All Activity Start 07/29/2024 All Activity End 08/02/2024
Start Year 2024	Supervisor Dennis Ritter Director Scott Rukke	Inspection Submitted 09/25/2024 Inspection Approval 09/26/2024 by Scott Rukke
System Type DA		
Protocol Set ID DA.2024.01		

## Inspection Summary

### Inspection Scope and Summary

Inspection completed remotely via MS Teams. A small sample of records were not available during the meeting but Enumclaw was able to provide them via email in the following days. Reviewed D&A Plan and associated records.

### Facilities visited and Total AFOD

Inspection conducted remotely via MS Teams

1 AFOD

### Summary of Significant Findings

(DO NOT Discuss Enforcement options)

There were no violations or areas of concern resulting from this inspection

### Primary Operator contacts and/or participants

Nick Peelo, Gas Utility Manager, Enumclaw, City of 360-615-5787, npeelo @ ci.enumclaw.wa.us

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

Jan Molinaro, Mayor, Enumclaw, City of, 360-615-5608

## 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	--	40	40	40	40	100.0%

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

## Plans

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

[8779] Enumclaw D&A

Report Filters: Results: all

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# Plan Implementations

#	Activity Name	SMART Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Asset Types	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	[8779] Enumclaw D &A	--	07/29/2024 08/02/2024	--	DA	all assets	all types	40	40	40	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	[8779] Enumclaw D&A	COMPLETED	09/20/2024	[8779] Enumclaw D&A	88992 (115)

## Results (all values, 40 results)

### DA.GENERAL: General Program Requirements

1. Question Result, ID, References **Sat, DA.GENERAL.DER.R, 40.3 (40.15(d), 40.355(k))**

Question Text *Has the operator appointed a company employee as the Designated Employer Representative (DER)?*

Assets Covered **88992 (115)**

Result Notes **DER Listed in Appendix B**

Tana Nissen

City of Enumclaw
2. Question Result, ID, References **Sat, DA.GENERAL.SERVICEAGENTOVERSIGHT.P, 40.11(b) (40.11(c), 40.15(c), 40.341(a), 40.355(a), 40.355(m), 40.355(n))**

Question Text *Does the process ensure the operator remains responsible for the actions of all its service agents, including a Consortium/Third Party Administrator (C/TPA)?*

Assets Covered **88992 (115)**

Result Notes **Section III.4**

Use of Service Agents
3. Question Result, ID, References **Sat, DA.GENERAL.COVEREDEMPLOYEES.P, 199.3 (199.1, 40.347(b)(2))**

Question Text *Does the process result in the proper and complete identification of covered employees and the exclusion of non-covered employees?*

Assets Covered **88992 (115)**

Result Notes **Appendix C shows covered positions**

Section III.6

Non-DOT Testing
4. Question Result, ID, References **Sat, DA.GENERAL.PREVIOUSEMPLOYERRECORDS.P, 40.25(a) (40.25(b), 40.25(c), 40.25(d), 40.25(e), 40.25(f), 40.25(g), 40.27, 40.321(b), 40.351(d))**

Question Text *Does the process include previous employer DOT D&A record checks for employees seeking to perform covered functions for the first time (i.e., a new hire or an employee transferring into a safety-sensitive position)?*

Assets Covered 88992 (115)

Result Notes Section IV.3

#### History-check Requirement

5. Question Result, ID, References Sat, DA.GENERAL.NONDOTTESTS.P, 40.13(a) (40.13(b))

Question Text *Does the process separate and prioritize DOT drug and alcohol testing over all non-DOT drug and alcohol testing?*

Assets Covered 88992 (115)

Result Notes Section III.6

#### Non-DOT Testing

6. Question Result, ID, References Sat, DA.GENERAL.CONTRACTOROVERSIGHT.P, 199.115 (199.115(a), 199.115(b), 199.245(a), 199.245(b), 199.245(c))

Question Text *If a contractor performs covered functions on the pipeline and is allowed to have its own D&A Programs, does the process ensure the contractor fully complies with Parts 199 and 40?*

Assets Covered 88992 (115)

Result Notes Section VII.4

#### Contractor Monitoring

7. Question Result, ID, References Sat, DA.GENERAL.MISREPORTS.P, 199.119(a) (199.3, 199.119(f), 199.229(a), 199.229(d), 40.26)

Question Text *Does the process ensure D&A MIS reports are submitted annually to PHMSA as required?*

Assets Covered 88992 (115)

Result Notes Section VII.6

#### Management Information System

## DA.DRUG: Anti-Drug Program

8. Question Result, ID, References Sat, DA.DRUG.PLAN.P, 199.101(a) (199.101(a)(1), 199.101(a)(2), 199.101(a)(3), 199.101(a)(4))

Question Text *Is a written Anti-Drug Plan in-place and maintained that conforms to the requirements of Part 199 and Part 40?*

Assets Covered 88992 (115)

Result Notes City of Enumclaw has a written Anti-Drug Plan in-place and conforms to the requirements of Part 199 and Part 40

Revision Date 1/1/2023

9. Question Result, ID, References Sat, DA.DRUG.SERVICEAGENTQUAL.R, 199.5 (199.107(a), 199.109(b), 40.33, 40.81(a), 40.121, 40.281)

Question Text *Do records indicate that Anti-Drug program positions and/or service agents meet the applicable qualification requirements of Part 40 and Part 199?*

Assets Covered 88992 (115)

Result Notes Reviewed records for urine specimen collector training records

Reviewed MRO Qualification records

David Paine due 2027

Erin Blackburn due 2027

David Sanger due 12/8/2024

Nicole Hanratty SAP Certificate expires 3/31/25

10. Question Result, ID, References **Sat, DA.DRUG.PROHIBITEDDRUGS.P, 199.3 (40.3)**  
Question Text *Does the process require that DOT drug tests are only conducted for the "prohibited drugs" specified in Part 40?*  
Assets Covered **88992 (115)**  
Result Notes **Section V Table 1**

Required DOT Drug Tests & Cutoffs

11. Question Result, ID, References **Sat, DA.DRUG.PREEMPLOYMENT.P, 199.105(a) (199.105(c)(5))**  
Question Text *Does the process require that no individual is allowed to perform a covered function unless that individual passes a drug test or is covered by an anti-drug program that conforms to Part 199?*  
Assets Covered **88992 (115)**  
Result Notes **Section V.1**

DOT- Required Drug Test

Pre-Employment Testing

12. Question Result, ID, References **Sat, DA.DRUG.POSTACCIDENT.P, 199.105(b) (199.117(a)(5), 40.355(g), 40.355(h))**  
Question Text *Does the process ensure that post-accident drug testing is conducted as required?*  
Assets Covered **88992 (115)**  
Result Notes **Section V.1**

DOT- Required Drug Test

Post-Accident Testing

13. Question Result, ID, References **Sat, DA.DRUG.RANDOM.P, 199.105(c)(5) (199.105(c)(6), 199.105(c)(7), 199.105(c)(8), 199.105(c)(9))**  
Question Text *Does the process ensure that random drug testing is conducted as required?*  
Assets Covered **88992 (115)**  
Result Notes **Section V.1**

DOT- Required Drug Test

Random Drug Testing

14. Question Result, ID, References **Sat, DA.DRUG.REASONABLECAUSE.P, 199.105(d) (199.117(a)(3), 40.355(g), 40.355(h))**  
Question Text *Does the process ensure that reasonable cause drug testing is conducted as required?*  
Assets Covered **88992 (115)**  
Result Notes **Section V.1**

DOT- Required Drug Test

Reasonable Suspicion/Cause Testing

15. Question Result, ID, References **Sat, DA.DRUG.RETURN TODUTY.P, 199.105(e) (Part 40 Subpart O, 40.67(b), 40.285(a), 40.289(b), 40.305(a))**  
Question Text *Does the process ensure that return-to-duty drug testing is conducted as required?*  
Assets Covered **88992 (115)**  
Result Notes **Section V.1**

DOT- Required Drug Test

Return-to-Duty Testing

16. Question Result, ID, References Sat, DA.DRUG.FOLLOWUPTTEST.P, 199.105(f) (40.67(b), 40.307, 40.309)  
Question Text *Does the process ensure that follow-up drug testing is conducted as required?*  
Assets Covered 88992 (115)  
Result Notes Section V.1

DOT- Required Drug Test

Follow-up Testing

17. Question Result, ID, References Sat, DA.DRUG.MRODUTIES.P, 199.109(c) (199.109(a), 40.123(a), 40.123(b), 40.123(c), 40.123(e), 40.123(f), 40.123(g), Part 40 Subpart G)  
Question Text *Does the process ensure the MRO performs functions as required by DOT Procedures?*  
Assets Covered 88992 (115)  
Result Notes Section V.8

MRO Review of Drug Test Results

18. Question Result, ID, References Sat, DA.DRUG.MROTESTREPORTS.P, 199.109(d) (Part 40 Subpart G, 40.345(a), 40.345(b), 40.345(c), 40.355(b), 40.355(c))  
Question Text *Does the process ensure the MRO reports all drug test results to the DER as required?*  
Assets Covered 88992 (115)  
Result Notes Section V.8

MRO Review of Drug Test Results

19. Question Result, ID, References Sat, DA.DRUG.STANDOWNREMOVAL.P, 199.103(a) (199.7(a), 40.21(a), 40.21(b), 40.23(a), 40.23(b), 40.23(d), 40.287)  
Question Text *Does the process ensure an employee is immediately removed from performing covered functions after failing or refusing a drug test?*  
Assets Covered 88992 (115)  
Result Notes Section II.6

Stand-down Waiver

City of Enumclaw does not have a waiver but has processes in place if they were to request a waiver

20. Question Result, ID, References Sat, DA.DRUG.EAP.P, 199.113(a) (199.113(b), 199.113(c))  
Question Text *Does the process ensure that an EAP is established and available to employees and supervisory personnel?*  
Assets Covered 88992 (115)  
Result Notes Section VII.2

Employee Assistance Program

## DA.ALCOHOL: Alcohol Misuse Prevention Program

21. Question Result, ID, References Sat, DA.ALCOHOL.PLAN.P, 199.202  
Question Text *Is a written Alcohol Misuse Plan in-place and maintained that conforms to the requirements of Part 199 and Part 40?*  
Assets Covered 88992 (115)  
Result Notes City of Enumclaw has a written Anti-Drug and Alcohol Misuse Prevention Plan in-place and conforms to the requirements of Part 199 and Part 40

Revision Date 1/1/2023

22. Question Result, ID, References Sat, DA.ALCOHOL.SERVICEAGENTQUAL.R, 199.5 (40.213)  
Question Text *Do records indicate that Alcohol Misuse Prevention Program positions and/or service agents meet the applicable qualification requirements of Part 40 and Part 199?*  
Assets Covered 88992 (115)  
Result Notes Reviewed training records for service agents including breath alcohol tech and screening test tech
23. Question Result, ID, References Sat, DA.ALCOHOL.PROHIBITEDCONDUCT.P, 199.233 (199.215, 199.217, 199.219, 199.221, 199.223, 40.23(c), 40.285(a), 40.285(b))  
Question Text *Does the process ensure that a covered employee is not permitted to perform covered functions if the employee has engaged in prohibited conduct or an alcohol misuse rule of another DOT agency?*  
Assets Covered 88992 (115)  
Result Notes Section IV.7

Violation Consequences and Company Actions

24. Question Result, ID, References Sat, DA.ALCOHOL.SCREENINGTESTDEVICES.P, 40.229 (40.235(e))  
Question Text *Does the process for alcohol screening tests restrict the use of alcohol screening devices (ASDs) to the devices and associated requirements referenced by Part 40?*  
Assets Covered 88992 (115)  
Result Notes Section VI.3

PHMSA Inspection Protocol for Alcohol Testing Sites

Alcohol Testing Sites, Forms and Supplies

25. Question Result, ID, References Sat, DA.ALCOHOL.CONFIRMATIONTESTDEVICES.P, 40.231(a) (40.233(c))  
Question Text *Does the process for alcohol confirmation tests restrict the use of Evidential Breath Testing Devices (EBTs) to the devices and associated requirements referenced by Part 40?*  
Assets Covered 88992 (115)  
Result Notes Section VI.3

PHMSA Inspection Protocol for Alcohol Testing Sites

Alcohol Testing Sites, Forms and Supplies

26. Question Result, ID, References Sat, DA.ALCOHOL.PREEMPLOY.P, 199.209(b) (199.209(b)(1), 199.209(b)(2), 199.209(b)(3))  
Question Text *If pre-employment alcohol testing is conducted, does the process ensure that such testing is performed within the limits of Part 199?*  
Assets Covered 88992 (115)  
Result Notes Section VI.1

DOT Required Alcohol Tests

Pre-Employment Testing

27. Question Result, ID, References Sat, DA.ALCOHOL.POSTACCIDENT.P, 199.225(a) (199.225(a)(1), 199.225(a)(2), 199.225(a)(3), 199.227(b)(4))  
Question Text *Does the process ensure that post-accident alcohol testing is conducted as required?*  
Assets Covered 88992 (115)  
Result Notes Section VI.1

DOT Required Alcohol Tests

Post-Accident Testing

28. Question Result, ID, References [Sat, DA.ALCOHOL.REASONSUSPECT.P, 199.225\(b\) \(199.225\(b\)\(1\), 199.225\(b\)\(2\), 199.225\(b\)\(3\), 199.225\(b\)\(4\), 40.355\(g\), 40.355\(h\)\)](#)  
 Question Text *Does the process ensure that reasonable suspicion alcohol testing is conducted as required?*  
 Assets Covered [88992 \(115\)](#)  
 Result Notes [Section VI.1](#)
- [DOT Required Alcohol Tests](#)
- [Reasonable Suspicion/Cause Testing](#)
29. Question Result, ID, References [Sat, DA.ALCOHOL.RETURNDDUTY.P, 199.225\(c\) \(199.233, 199.243\(c\), 40.67\(b\), 40.285\(a\), 40.305\(a\)\)](#)  
 Question Text *Does the process ensure that return-to-duty alcohol testing is conducted as required?*  
 Assets Covered [88992 \(115\)](#)  
 Result Notes [Section VI.1](#)
- [DOT Required Alcohol Tests](#)
- [Return-to-Duty Testing](#)
30. Question Result, ID, References [Sat, DA.ALCOHOL.FOLLOWUPTTEST.P, 199.225\(d\) \(199.243\(c\)\(2\)\(ii\), 40.307\(a\), 40.307\(b\), 40.309\(a\)\)](#)  
 Question Text *Does the process ensure that follow-up alcohol testing is conducted as required?*  
 Assets Covered [88992 \(115\)](#)  
 Result Notes [Section VI.1](#)
- [DOT Required Alcohol Tests](#)
- [Follow-up Testing](#)
31. Question Result, ID, References [Sat, DA.ALCOHOL.SCREENINGTEST.P, 40.247\(a\)](#)  
 Question Text *Does the process ensure that alcohol screening test results are reported as required to the DER?*  
 Assets Covered [88992 \(115\)](#)  
 Result Notes [Section VI.2](#)
- [Alcohol Test](#)
32. Question Result, ID, References [Sat, DA.ALCOHOL.CONFIRMATIONTEST.P, 40.255\(a\) \(40.355\(d\)\)](#)  
 Question Text *Does the process ensure that alcohol confirmation test results are reported as required to the DER?*  
 Assets Covered [88992 \(115\)](#)  
 Result Notes [Section VI.3](#)
- [PHMSA Inspection Protocol for Alcohol Testing Sites](#)
33. Question Result, ID, References [Sat, DA.ALCOHOL.OTHERCONDUCT.P, 199.237\(a\) \(199.237\(b\), 40.23\(c\)\)](#)  
 Question Text *Does the process ensure that a covered employee is prohibited from performing or continuing to perform covered functions when found to have an alcohol concentration of 0.02 or greater but less than 0.04?*  
 Assets Covered [88992 \(115\)](#)  
 Result Notes [Section IV.7](#)
- [Violation Consequences and Company Actions](#)
34. Question Result, ID, References [Sat, DA.ALCOHOL.EMPLOYEEERESOURCES.P, 199.243\(a\) \(40.285\(b\)\)](#)  
 Question Text *Does the process ensure that each covered employee who has engaged in prohibited conduct is advised of the resources available to the covered employee in evaluating and resolving problems associated with the misuse of alcohol?*

Assets Covered 88992 (115)  
Result Notes Section VII.1

SAP Referral

35. Question Result, ID, References Sat, DA.ALCOHOL.EDUCATION.R, 199.239(a) (199.239(a)(1), 199.239(a)(2))

Question Text *Do records indicate educational materials were provided that explain alcohol misuse requirements and the policies and procedures with respect to meeting those requirements?*

Assets Covered 88992 (115)

Result Notes Employees receive handbook during onboarding

Reviewed records of employee acknowledgement that they had received it

36. Question Result, ID, References Sat, DA.ALCOHOL.EDUCATIONCONTENT.R, 199.239(b)

Question Text *Do records indicate the alcohol misuse educational materials provided by the operator included the required content?*

Assets Covered 88992 (115)

Result Notes Reviewed documents including What Employees Need to Know, Hotline Poster, Common Questions for SAP

37. Question Result, ID, References Sat, DA.ALCOHOL.SUPERVISORTRAINALCOHOL.P, 199.241

Question Text *Does the process include the required 60-minute supervisory personnel training related to recognizing reasonable suspicion for alcohol testing?*

Assets Covered 88992 (115)

Result Notes Section VII.3

Supervisor Training

## DA.PROGRAMRECORDS: Drug and Alcohol Program Records

38. Question Result, ID, References Sat, DA.PROGRAMRECORDS.RECORDKEEPING.R, 199.117(b) (199.227(a), 199.231(b), 40.333(c), 40.333(d), 40.333(e))

Question Text *Are drug and alcohol program records maintained and kept in a secure and proper location?*

Assets Covered 88992 (115)

Result Notes Maintained by Pipeline Testing Consortium

39. Question Result, ID, References Sat, DA.PROGRAMRECORDS.DRUG.R, 199.117(a) (199.117(a)(1), 199.117(a)(2), 199.117(a)(3), 199.117(a)(4), 199.117(a)(5), 40.97(b), 40.111(a), 40.333(a)(1), 40.333(a)(2), 40.333(a)(4))

Question Text *Are drug test records retained for five years, three years, and one year as required and readily available?*

Assets Covered 88992 (115)

Result Notes MIS submitted to PHMSA and WUTC on 2/14/2023 due to PHMSA request for submittal

Enumclaw does not have more than 50 employees so they do not normally submit MIS forms

No positive tests during this inspection period

Reviewed supervisor training records, 1 hour drug and 1 hour alcohol recognition

Reviewed records of negative results for last 5 years

40. Question Result, ID, References Sat, DA.PROGRAMRECORDS.ALCOHOL.R, 199.227(b) (199.227(b)(1), 199.227(b)(2), 199.227(b)(3), 199.227(b)(4), 40.333(a)(1), 40.333(a)(2), 40.333(a)(3), 40.333(a)(4))

Question Text *Are alcohol test records retained for five years, three years, two years, and one year as required and readily available?*

Assets Covered 88992 (115)

Result Notes Reviewed calibration records for collection site



## One random alcohol test

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.