

UTC - Standard Annual Review Inspection Report
 Inmate Operators
 FDMA - Annual Review

Inspector and Operator Information

Inspection ID	Inspection Link	Inspector-Lead	Inspector-Assist
8845	8845	Derek Norwood	
Operator	Unit	Records Location - City & State	
City of Enumclaw	Gas Department	Enumclaw	
Inspection Start Date	Inspection Exit Interview Date	Engineer Submit Date	
08-13-2024	08-13-2024	09-20-2024	

Inspection Summary

You must include the following in your inspection summary:

- *Inspection Scope and Summary
- *Facilities visited and Total AFOD
- * Summary of Significant Findings
- * Primary Operator contacts and/ or participants

Inspection Scope and Summary

Inspection completed remotely via MS Teams. Reviewed revisions to all manuals and the 2023 annual report and incidents.

Facilities visited and Total AFOD

Inspection conducted remotely via MS Teams

AFOD

Summary of Significant Findings

(DCI NCI Discuss Enforcement options)
 There were no violations or areas of concern resulting from this inspection

Primary Operator contacts and/ or participants

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

Operator executive contact and mailing address for any official correspondence

Jan Molinaro, Mayor, Enumclaw, City of, 360-615-5668

Instructions and Ratings Definitions

INSPECTION RESULTS: Annual Review

Satisfactory Responses	Satisfactory List	Number of Unanswered Questions	Unanswered List
19	1,5,9,10,12,13,14,15,16,22,24,25,26,27,28,31,32,37,	0	
Unsatisfactory Responses	Unsatisfactory List		
0			
Area of Concern Responses	Area of Concern List		
0			
Not Applicable Responses	Not Applicable List		
19	3,4,6,7,8,17,18,19,20,21,23,29,30,35,39,40,42,43,44		
Yes Responses	Yes List	No Responses	No List
1	36,	3	34,38,41
Not Checked / Evaluated Responses	Not Checked / Evaluated List		
0			

*If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question and also summarized in the "SUMMARY OF REQUIRED COMMENTS" section at the end of this inspection form.

ANNUAL REPORT: ACCURACY/TRENDS

Question #1. 1. Result
 Was the Annual Report reviewed for accuracy and trends? If any trends were discovered, please describe. Satisfactory

1. Notes

Annual Report submitted 3/7/24
 Manual Revisions tracked in Cartaghragh, all procedures are reviewed annually
 Contacts section of manual sent to UTC when changes are made, Appendix 3-B-1

Access to Complete Distribution Annual Report

Year	Operator	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length
2023	City of Enumclaw	121.034	85.59	5140	87.92
2022	City of Enumclaw	119.9	83.24	5072	86.65
2021	City of Enumclaw	116.731	78.72	5038	82.5
2020	City of Enumclaw	114.9	74.98	4949	80
2019	City of Enumclaw	111.6	71.85	4742	80
2018	City of Enumclaw	102.28	68.02	4489	80
2017	City of Enumclaw	98.6	65.47	4321	80
2016	City of Enumclaw	97.25	65.00	4288	80
2015	City of Enumclaw	95.87	64.33	4246	80

Access to Complete Transmission Annual Report

YEAR	Operator	Commodity Group	Total Total Miles
No Report records found			

Access to Complete Hazardous Liquid Annual Report

YEAR	Operator	Commodity Group	Total Total Miles
No Report records found			

DAMAGE PREVENTION

Annual Report Damage Prevention data

Year	Operator	Number of Excavation Tickets	Total Number of Excavation Damages By Apparent Root Cause:	Localizing Practices Not Sufficient:	One-Call Notification Practices Not Sufficient:	Excavation Practices Not Sufficient:	Other:	Number of Services	Total Leaks - of Excavation Damage	Total Main Leaks	Miles of Service MAIN	Number of Leaks per Mile of MAIN	Total Leaks Per 1,000 Locales	Number of Hits Per 1,000 Ticket Requests	Number of Hits Per 10,000 Services	Number of Hits to Tickets
2023	City of Enumclaw	1810	4	0	0	3	1	5140	3	0	121.034	0	1.657488563536	2.21	7.7821011673152	0.22%
2022	City of Enumclaw	2081	9	0	3	6	0	5072	0	0	119.9	0	4.32	17.744479495268	0.43%	
2021	City of Enumclaw	2434	2	0	0	2	0	5038	0	116.731	78.72	1.482863130081	0	0.82	3.968292937402	0.08%
2020	City of Enumclaw	1905	5	1	1	3	0	4949	4	4	114.9	0.034812880765883	2.0997375328084	2.62	10.10305121439	0.26%
2019	City of Enumclaw	2002	8	1	1	5	1	4742					0	4.00	16.870518768452	0.40%
2018	City of Enumclaw	1519	5	1	0	4	0	4489					0	3.29	11.138338159947	0.33%
2017	City of Enumclaw	711	5		1	3	1	4321					0	7.03	11.571395510299	0.70%
2016	City of Enumclaw	639	5	0	0	3	2	4290					0	7.82	11.655011655012	0.78%
2015	City of Enumclaw	664	5	0	0	3	2	4246					0	7.53	11.757897897862	0.75%

DIRT data on mismarks for prior year

Damage Cause	Number of Reports
No Report records found	

DIRT Timeliness - Prior Year Reports must be submitted within 45 days of the damage.

Late	no	Totals
SubmitCompanyID - UTCfinalName	Number of Reports	Number of Reports
City of Encinitas Gas Utility	4	4
Totals (1 group)	4	4

Question #2.

Review the following damage prevention items:

Q2.a. Is the damage prevention information in the annual report complete?

Satisfactory

Q2.b. Is the annual report damages root cause information complete and accurate?

Satisfactory

Q2.c. Does the operator have a process to evaluate the cause of "One-call notification practices not sufficient" category?

N/A, no such event occurred

Q2.d. Does the operator follow a process to evaluate the cause of "Locating practices not sufficient" category?

N/A, no such event occurred

Q2.e. Is the operator or its contractor qualified and following procedures for locating and marking facilities?

TAXX KNT 192-080 Locating Pipelines, PEF 192.07 0801, reviewed personnel qualifications

Q2.f. Is the operator appropriately requalifying locators to address performance deficiencies?

(Requalified every 5 years)

Q2.g. What is the number of damages resulting from mismarks?

0

Q2.h. What is the number of damages resulting from not locating within the time requirements?

0

Q2.i. Is the operator appropriately addressing discovered mapping errors resulting in excavation damage?

N/A, no mapping error discovered resulting in damage in 2023

Q2.j. Are mapping corrections timely and according to written procedures?

Satisfactory, mapping issues communicated to engineer for revision, none in 2023

Q2.k. Does the operator follow a process to evaluate causes for damages listed "Excavation Practices Not Sufficient"?

3 damages in 2023. 1st: 3rd party digging with equipment when should have been using hand tools and hit gas line. 2nd: person used sawzall to remove line not knowing it was a gas line. 3rd: Homeowner installing customer owned line to generator and hit gas line, educational material and RCW requirements provided to personnel who damage a gas line

Q2.l. Is the operator appropriately focusing damage prevention education and training to address the causes of excavation damage?

Educational material and RCW requirements provided to personnel who damage a gas line

2. Notes

NPMS SUBMISSIONS/CHANGES

Question #3.

For transmission operators, has the operator submitted information to the NPMS database, along with charges made after the original submission?

3. Result

Not Applicable

3. Notes

No transmission pipelines

INCIDENT/SRC/AOC REPORTS REVIEW

Question #4

Were there any federally reportable incidents during the previous year? Are there any discernable trends to these incidents?

4. Results

Not Applicable

4. Notes

N/A, no federal incidents

Q4: Federally reportable incidents

NotificationID	Operator	Company	NRC #	Assigned Engineer	Date & Time of Incident	Street Address of event/incident	Incident Address: City	Closure Date	Reporting Level
No Incident Notification records found									

Question #5.

Review operator records of previous year's accidents and failures including reported third party damage and leak response. Is the operator ensuring appropriate evaluation and response as required in 192.617 (Gas) or 195.402 (H₂) to determine cause of failure? Is the operator taking appropriate steps to minimize the possibility of recurrence?

5. Result

Satisfactory

5. Notes

4 damages in 2023. 1st: 3rd party digging with equipment when should have been using hand tools and hit gas line. 2nd: person used sawzall to remove line not knowing it was a gas line. 3rd: Homeowner installing customer owned line to generator and hit gas line. 4th: homeowner mowing tall grass and hit farm tap, educational material and RCW requirements provided to personnel who damage a gas line

Question #6.

Review incident reports for the previous year for accuracy and identify any trends. If any trends discovered please describe. (Please see list of incident data at end of this report)

6. Result

Not Applicable

Q6: Incident Reports

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of Incident	Is 30 Day Report Received?	Reporting Level
No Incident Notification records found						

6. Notes

No reportable incidents in 2023

Question #7.

Were there reportable or unreportable safety related conditions during the previous year? If yes please describe.

7. Result

Not Applicable

Q7: Report of SRCs

NotificationID	Company	Safety-Related Condition	Safety-RelatedConditionChoices	Reportable?	Date & Time of Incident	Company Notified Date	Report Date
No Incident Notification records found							

7. Notes

Question #8.
For transmission systems, were there any abnormal operating conditions (as described in 192.605 (a) or 195.402(a)) since the last annual review? If yes please describe.

8. Notes
Not a transmission operator

O&M & EMERGENCY PROGRAMS

Question #9.
Is the O&M Manual up to date and were changes made in the previous year?

Operator Manuals on Sharepoint

9. Result
Satisfactory

9. Notes
Reviewed revision log for 2023, changes included removing names of specific personnel, removed test station numbers due to the removal of steel service, etc
All changes were fairly minor, no major revisions
Every procedure is reviewed annually, tracked in Cartegraph

Question #10.
If changes to the O&M were made, are changes acceptable?

10. Result
Satisfactory

10. Notes

Question #11.
Were emergency plans changed during the previous year?

11. Result
Satisfactory
11. Notes
Emergency Plans reviewed annually
Only change was updating contact info
New public works director

Question #12.
Were any changes to emergency plans satisfactory?

12. Result
Satisfactory
12. Notes
Only change was updating contact info
New public works director

INTEGRITY MANAGEMENT PROGRAMS

Question #13.
Were there changes to the Integrity Management programs (TIMP, DIMP or both, as applicable)?

13. Result
Satisfactory

13. Notes
Reviewed annually
Enumclaw uses SHRIMP
Section 11.2 includes all changes to the system including updated risk info

Question #14.
Is the DIMP/TIMP up to date? What are the results of the operator's program review (effectiveness evaluation) [DIMP every 5 years]?

14. Result
Satisfactory

14. Notes
DIMP is updated annually
Threats have remained mostly consistent year to year, Section 6 of SHRIMP
Effectiveness review completed annually when running SHRIMP

Question #15.
Are IMP program changes acceptable?

15. Result
Satisfactory

15. Notes
DIMP is updated annually
Threats have remained mostly consistent year to year, Section 6 of SHRIMP
Effectiveness review completed annually when running SHRIMP

Question #16.
Was appropriate assessment/ repair work conducted during the past year? (monitor progress of IMP activities)

16. Results
Satisfactory

16. Notes
Replace steel pipe as able but no specific program for replacing high risk pipe
Have not identified any pipe, components, etc. that need to be mitigated

Question #17.
Does the operator's HCA location data correspond to the positional data located in UTC GIS?

17. Results
Not Applicable

17. Notes
HCAs are specific to TIMP, Enumclaw has no transmission lines

Question #18.
What assessment work is planned for the upcoming year?

18. Results
Not Applicable

18. Notes
No transmission lines

Question #19.
Within the operator's DIMP, are low pressure systems evaluated for overpressure threats?

19. Results
Not Applicable

19. Notes
No low pressure systems

Question #20.
Did the operator develop and follow specific procedures for low pressure system construction or maintenance projects? (Note: this question is revisited in greater detail in the ADR review section)

20. Results
Not Applicable

20. Notes
No low pressure systems

Question #21.
Are plastic pipe and components that have shown a record of defects/leaks being mitigated through the DIMP plans?

21. Results
Not Applicable

21. Notes
Have not identified any plastic or components that have known integrity issues

Question #22.
Has appropriate DIMP remediation work occurred during the past year? (monitor progress of DIMP activities)

22. Results
Satisfactory

22. Notes
No dimp remediation work last year or this year
Booth at street far for B11 and public outreach

Question #23.
What DIMP remediation work is anticipated for upcoming year?

23. Results
Not Applicable

23. Notes
No upcoming remediation work planned

OG PROGRAM

Question #24
Is the OG program up to date? Were there changes to the Operator Qualification (OQ) program in the last year? If yes, please describe.

24. Notes
Reviewed annually, completed 2/29/24 for 2023 calendar year, no changes recommended

Question #25
Are the OQ plan updates satisfactory?

25. Notes
Reviewed annually, completed 2/29/24 for 2023 calendar, no changes recommended

Question #26
Are personnel performing covered tasks (including contractors) properly qualified and requalified at intervals determined in the operator's plan?

26. Notes
Reviewed a sample of personnel OQs, tracked in MEA
Personnel have badges to see real-time OQs

24. Results
Satisfactory

25. Results
Satisfactory

26. Results
Satisfactory

PUBLIC AWARENESS PROGRAM

Question #27
Is the PA program up to date? And were there changes to the Public Awareness (PA) program within the last year?

27. Notes
No changes in 2023, reviewed annually
In 2022, Enumaclaw began using electronic survey to target gas customers

Question #28
Are changes to the PA program satisfactory?

28. Notes
No changes in 2023, reviewed annually
In 2022, Enumaclaw began using electronic survey to target gas customers

27. Results
Satisfactory

28. Results
Satisfactory

CONTROL ROOM PROGRAM

Question #29
Is the CRM program up to date? And were there changes to the Control Room Management (CRM) program within the last year?

29. Notes
No control room

Question #30
Are the CRM program changes satisfactory?

30. Notes
No control room

29. Results
Not Applicable

30. Results
Not Applicable

SAFETY MANAGEMENT SYSTEM API 1173

Question #31
Is the operator developing and implementing an API 1173 Safety Management System?

31. Notes
Not currently implementing but will take a look

31. Results
Satisfactory

INSPECTOR ASSESSMENT OF INSPECTION UNITS

Question #32
Are inspection units broken down appropriately? Do you recommend any changes to inspection units?

32. Notes
Enumaclaw unit is very manageable for completing inspection in a timely manner

32. Results
Satisfactory

Q32: List of current inspection units

Unit Name	Distribution/Transmission	Intrastate or Interstate?	GAS or LIQUID	Operator - OPID	Unit ID	Date Created
City of Enumaclaw (1 Unit)						
City of Enumaclaw-Natural Gas Department	Distribution	Intrastate	Gas	4500	City of Enumaclaw	02-06-2019 10:50 AM

OPERATOR'S PUBLIC WEB PAGE

Question #33
For informational purposes: Using the drop down selections available in the "Results" block, indicate whether the operator's web page contains the information listed by placing a check in the box adjacent to all items that are present.

33. Results
Q33.A. Pipeline Purpose and Reliability ; Q33.B. Damage Prevention ; Q33.C. Pipe Location Information ; Q33.D. How to get additional information ; Q33.F. On-Call Requirements ; Q33.G. Potential Hazards ; Q33.H. Prevention Measures ; Q33.I. Pipeline Location Information ; Q33.L. Integrity Management Programs ; Q33.M. Emergency Preparedness

33. Notes
How the gas system is maintained
B11, locates, 2 days before you dig
No public facing map but information for customers to request locates
Contact Info, Gas Safety Information sheet
Gas Safety Sheet, what to do in emergency
"How we keep the gas system safe" document

ADVISORY BULLETIN REVIEW

Question #34
Is there potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration?

A08 2019-01
ADB 2019-01 Flood Mitigation

34. Notes
No areas identified where this is a significant risk

34. Results
NO

Question #35
If "YES" to Q34, did the operator take appropriate action in accordance with the guidance contained A08 2019-01? Discuss A08's guidance with operator's representative, and annotate any concerns.

A08 2019-01
ADB 2019-01: Flood Mitigation

35. Notes
No areas identified where this is a significant risk

35. Results
Not Applicable

Question #36
Is there potential for the operator's system to be damaged by earth movement or other seismic/geological activities?

A08 2019-02
ADB 2019-02: Earth Movement/Geological Hazards

36. Notes
Public page has information on gas safety in the event of an earthquake
Leak surveys would be conducted in the event of earthquake

36. Results
YES

Question #37

If "YES" to Q36, did the operator take appropriate action according to ADB 2019-Q2? Discuss suggested actions from ADB with operator's representative and annotate any concerns.

ADB 2019-Q2

ADB 2019-Q2: Earth Movement/Geological Hazards

37. Notes

Enunciate how has reviewed the ADB and have implemented extra safety checks in the event of seismic activity

Question #38

Does the operator have any indoor meter sets or regulators in their system?

ADB 2020-Q1

ADB 2020-Q1 Inside Meter Sets

38. Notes

No indoor meter sets

Question #39

If operator's system has indoor meter sets/regulators, did the operator review ADB 2020-Q11E? Discuss ADB guidance with operator's representative and annotate any concerns. Particular attention must be given to the operator's plan to conduct leak surveys, AC inspections, and other maintenance activities in locations that are difficult to access, as well as the inclusion of inside meters/regulators within the operator's DIMP plan, as applicable.

ADB 2020-Q1

ADB 2020-Q1 Inside Meter Sets

39. Notes

No indoor meter sets

Question #40

Is the operator's record of locations for all indoor meter sets/regulators within their system complete and sufficiently detailed??

ADB 2020-Q1

ADB 2020-Q1 Inside Meter Sets

40. Notes

No indoor meter sets

Question #41

Does the operator have any low pressure systems?

ADB 2020-Q2

ADB 2020-Q2 Low Pressure Systems

41. Notes

No low pressure systems

Question #42

If "YES" to Q41, did the operator review ADB 2020-0025 for Overpressure Protection of Low-Pressure Natural Gas Distribution Systems? Review ADB guidance with operator and annotate any concerns.

ADB 2020-Q2

ADB 2020-Q2 Low Pressure Systems

42. Notes

No low pressure systems

Question #43

For low pressure construction/maintenance projects, does the operator have a process for review of engineering plans and constructability reviews that are carried out through all applicable departments? Do all applicable departments review project plans for accuracy, completeness and correctness? How are control procedures developed that could identify system threats that could result in a common failure mode? How is the operator mitigating risk in their low pressure system?

ADB 2020-Q2

ADB 2020-Q2 Low Pressure Systems

43. Notes

No low pressure systems

Question #44

Does the operator include all low-pressure system risks in their DIMP program appropriately?

ADB 2020-Q2

ADB 2020-Q2 Low Pressure Systems

44. Notes

No low pressure systems

37. Results

Satisfactory

38. Results

NO

39. Results

Not Applicable

40. Results

Not Applicable

41. Results

NO

42. Results

Not Applicable

43. Results

Not Applicable

44. Results

Not Applicable

☛ SUMMARY OF REQUIRED COMMENTS

COMMENTS: Required for any ratings other than Satisfactory. Summarize/consolidate entries from the "Notes" blocks above. Ensure you annotate the question number for each comment.