

Inspection Output (IOR)

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Inspection Information

Inspection Name	Ellensburg DIMP (8068)	Operator(s)	ELLENSBURG GAS DEPT, CITY OF (4400)	Plan Submitted	--
Status	STARTED	Lead	Derek Norwood	Plan Approval	--
Start Year	2020	Team Members	Scott Rukke	All Activity Start	09/14/2020
System Type	GD	Observer(s)	David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Deborah Becker, Scott Anderson, Darren Tinnerstet, Rell Koizumi	All Activity End	09/17/2020
Protocol Set ID	GD.2020.01	Supervisor	Joe Subsits	Inspection Submitted	--
		Director	Sean Mayo	Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

This inspection was conducted remotely via GoToMeeting on September 16th with a follow-up call and exit interview on September 30, 2020. The inspection included a review of City of Ellensburg's DIMP Plan and the associated records.

Facilities visited and Total AFOD

The inspection was conducted remotely via GoToMeeting, email and phone calls.

Total AFODs: 1 day

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

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Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	88964 (89)	City of Ellensburg	unit	88964	--	85	85	85	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.	88964 (89)	n/a	GDIM	P, R, O, S	Detail	

Plan Implementations

Activity #	SMART Act#	Start Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete	
1.	DIMP	--	09/14/2020 09/17/2020	n/a	GDIM	all assets	O, P, R	85	85	85	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

This inspection has no Form data entry.

Results (all values, 85 results)

86 (instead of 85) results are listed due to re-presentation of questions in more than one sub-group.

GDIM.IM: Plan Implementation

1. Question Result, ID, References
Sat, GDIM.QA.PLANIMPLEMENT.P, 192.1005
Question Text Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011?
Assets Covered 88964 (89)
Result Notes Section 22 - DIMP Plan issued August 2010
Section 23 - Dimp Program issued August 2010
2. Question Result, ID, References
Sat, GDIM.RA.SOURCES.P, 192.1007(a)(1)

Question Text *Do the procedures identify or reference the appropriate sources used to determine certain characteristics (e.g., Design, Operating Conditions, Operating Environmental Factors) necessary to assess the threats and risks to the pipeline?*

Assets Covered 88964 (89)

Result Notes [Add notes](#)

GDIM.KN: Knowledge of the System

3. Question Result, ID, References [Sat, GDIM.RA.INFORMATION.P, 192.1007\(a\)\(2\)](#)

Question Text *Do the procedures require the consideration of information gained from past design, operations, and maintenance (e.g. O&M activities, field surveys, One-Call system information, excavation damage, etc.)?*

Assets Covered 88964 (89)

Result Notes [Appendix A Chapter 3, Section 23.1](#)

4. Question Result, ID, References [Sat, GDIM.RA.GAPS.P, 192.1007\(a\)\(3\)](#)

Question Text *Does the plan contain procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records?*

Assets Covered 88964 (89)

Result Notes [23.1, Appendix A Section 11.1C](#)

5. Question Result, ID, References [Sat, GDIM.RA.INFONEEDS.P, 192.1007\(a\)\(3\)](#)

Question Text *Do the procedures specify the means to collect the additional information needed to fill gaps due to missing, inaccurate, or incomplete records (e.g., O&M activities, field surveys, One-Call System, etc.)?*

Assets Covered 88964 (89)

Result Notes [Appendix A Section 11.1A](#)

6. Question Result, ID, References [NA, GDIM.RA.INFONEEDS.R, 192.1007\(a\)\(3\)](#)

Question Text *Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records?*

Assets Covered 88964 (89)

Result Notes [Ellensburg's SHRIMP did not call out any gaps that need to be filled](#)

[Appendix A Section 11.1C](#)

7. Question Result, ID, References [Sat, GDIM.RA.NEWPIPEDATA.P, 192.1007\(a\)\(5\)](#)

Question Text *Do the procedures require the capture and retention of data on any new pipeline installed?*

Assets Covered 88964 (89)

Result Notes [Appendix A Section 11.1.A.1.a](#)

[Section 2.1.D](#)

[Pipe Specification of Pipes Used Form](#)

8. Question Result, ID, References [Sat, GDIM.RA.NEWPIPEDATA.R, 192.1007\(a\)\(5\)](#)

Question Text *Does the data required for capture and retention include, at a minimum, the location where the new pipeline is installed and the material from which it is constructed?*

Assets Covered 88964 (89)

Result Notes [Reviewed a sample of Pipe Specification of Pipes Used Form. All forms showed location of pipe installed and material information](#)

9. Question Result, ID, References [Sat, GDIM.RA.DEMOKNOWLEDGE.R, 192.1007\(a\)](#)

Question Text *Do records demonstrate implementation of the element "Knowledge of the System"?*

Assets Covered 88964 (89)

Result Notes [Darin to get records for Leak Repair Reports and Patrolling](#)

10. Question Result, ID, References **Sat, GDIM.RA.DEMOUNDERSTANDING.R, 192.1007(a)**
Question Text *Has the operator demonstrated an adequate understanding of the system?*
Assets Covered **88964 (89)**

GDIM.TH: Identify Threats

11. Question Result, ID, References **Sat, GDIM.RA.INFOCONSIDERED.P, 192.1007(b)**
Question Text *Did the operator consider the information that was reasonably available to identify existing and potential threats?*
Assets Covered **88964 (89)**
Result Notes **Section 23.2 identifies threat categories**

Appendix A Chapter 4

Appendix A Chapter 11.2 has questions and answer input into SHRIMP. Answers are based on information that was reasonably available
12. Question Result, ID, References **Sat, GDIM.RA.INFOCONSIDERED.R, 192.1007(b)**
Question Text *In identifying threats did the information considered include all of the required data and information sources?*
Assets Covered **88964 (89)**
Result Notes **Section 23.2 identifies all threats with subsections for each threat. The subsections identify information necessary to assess the threat.**

Section 23.1 identifies the specific records that will be utilized
13. Question Result, ID, References **Sat, GDIM.RA.OUTSIDESOURCES.P, 192.1007(b)**
Question Text *Do the procedures consider, in addition to the operator's own information, data from external sources (e.g. trade associations, government agencies, or other system operators, etc.) to assist in identifying potential threats?*
Assets Covered **88964 (89)**
Result Notes **Appendix A Chapter 4.1.2**
14. Question Result, ID, References **Sat, GDIM.RA.THREATCATEGORIES.P, 192.1007(b)**
Question Text *In identifying threats, do the procedures include consideration of all of the required threat categories to each gas distribution pipeline?*
Assets Covered **88964 (89)**
Result Notes **Section 23.2**

Appendix A Chapter 4.2
15. Question Result, ID, References **Sat, GDIM.RA.IMPLEMENTTH.R, 192.1007(b)**
Question Text *Do records demonstrate implementation of the element "Identify Threats"?*
Assets Covered **88964 (89)**
Result Notes **Reviewed leak records, patrolling records and odorant readings**

GDIM.RR: Evaluate and Rank Risk

16. Question Result, ID, References **Sat, GDIM.RA.RISKRANKING.P, 192.1007(c)**
Question Text *Do the procedures contain the method(s) and/or a model used to determine the relative importance of each threat and estimate and rank the risks posed?*
Assets Covered **88964 (89)**

Section 23.3

Risks are prioritized based on output from SHRIMP

17. Question Result, ID, References Sat, GDIM.RA.THREATSCONSIDERED.P, 192.1007(c)
Question Text *Do the procedures to evaluate and rank risk consider each applicable current and potential threat?*
Assets Covered 88964 (89)
Result Notes Appendix A Section 5.2 assesses current and potential threats. Risks that scored greater than zero are the current threats and scores of zero are potential threats. 14 threats were identified

Appendix A Section 11.4.2 addresses the relative risk model
18. Question Result, ID, References Sat, GDIM.RA.LIKELIHOOD.P, 192.1007(c)
Question Text *Do the procedures to evaluate and rank risk consider the likelihood of failure associated with each threat?*
Assets Covered 88964 (89)
Result Notes Appendix A Section 11.4.2 The SHRIMP model considers both probability and consequence

Appendix A Section 5.2 has a probability score for each risk
19. Question Result, ID, References Sat, GDIM.RA.CONSEQUENCE.P, 192.1007(c)
Question Text *Do the procedures to evaluate and rank risk consider the potential consequence of failure for all applicable threats?*
Assets Covered 88964 (89)
Result Notes Appendix A Section 11.4.2 The SHRIMP model considers both probability and consequence

Appendix A Section 5.2 has a consequence score for each risk
20. Question Result, ID, References NA, GDIM.RA.SUBDIVIDE.R, 192.1007(c)
Question Text *If subdivision of system occurs, does the plan subdivide the system into regions with similar characteristics and for which similar actions are likely to be effective in reducing risk?*
Assets Covered 88964 (89)
Result Notes Ellensburg does not subdivide their system
21. Question Result, ID, References Sat, GDIM.RA.RESULTS.R, 192.1007(c)
Question Text *Are the results of the risk ranking supported by the risk evaluation model/method?*
Assets Covered 88964 (89)
Result Notes Risks are ranked according to questions answered in SHRIMP. Ellensburg has the ability to adjust based on operational knowledge and experience
22. Question Result, ID, References Sat, GDIM.RA.RESULTSVALIDATION.R, 192.1007(c)
Question Text *Did the operator validate the results generated by the risk evaluation model/method?*
Assets Covered 88964 (89)
Result Notes Ellensburg generates SHRIMP results annually starting in 2019. Prior to that it had been done at least every five years. Completed in 2011, 2014, 2019 and 2020
23. Question Result, ID, References Sat, GDIM.RA.IMPLEMENTRR.R, 192.1007(c)
Question Text *Do records demonstrate implementation of the element "Evaluate and Rank Risk"?*
Assets Covered 88964 (89)

GDIM.PM: Preventive and Mitigative Actions

24. Question Result, ID, References **Sat, GDIM.PM.IDENTIFYMEASURES.P, 192.1007(d)**
 Question Text *Does the plan include procedures to identify when measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk?*
 Assets Covered **88964 (89)**
 Result Notes **Section 23.6.1 identifies pro-active actions that Ellensburg has taken**
Appendix A Chapter 6 identifies additional actions to be taken
25. Question Result, ID, References **Sat, GDIM.PM.IDENTIFYMEASURES.R, 192.1007(d)**
 Question Text *When measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk, does the plan identify the measures selected, how they will be implemented, and the risks they are addressing?*
 Assets Covered **88964 (89)**
 Result Notes **Reviewed bollard installation records for outside force damage, new CP test points.**
26. Question Result, ID, References **Sat, GDIM.PM.LEAKMANAGEMENT.P, 192.1007(d)**
 Question Text *Does the plan include an effective leak management program (unless all leaks are repaired when found)?*
 Assets Covered **88964 (89)**
 Result Notes **Ellensburg tends to repair leaks as they find them. They do have leak repair criteria in Appendix A Chapter 6**
27. Question Result, ID, References **Sat, GDIM.PM.IMPLEMENTPM.R, 192.1007(d)**
 Question Text *Do records demonstrate implementation of the measures, required by Part 192 Subpart P, to reduce risk?*
 Assets Covered **88964 (89)**

GDIM.EV: Measure Performance and Evaluate Effectiveness

28. Question Result, ID, References **Sat, GDIM.QA.PERFMEASUREBASELINE.P, 192.1007(e)**
 Question Text *Does the plan contain procedures for how the operator established a baseline for each performance measure?*
 Assets Covered **88964 (89)**
 Result Notes **Section 23.5**
Ellensburg's baseline is based on a 6-year rolling average for each performance measure
29. Question Result, ID, References **Sat, GDIM.QA.PERFMEASUREBASELINE.R, 192.1007(e)**
 Question Text *Does the plan establish a baseline for each performance measure?*
 Assets Covered **88964 (89)**
30. Question Result, ID, References **Sat, GDIM.QA.PERFMEASUREDATA.P, 192.1007(e)**
 Question Text *Does the operator have procedures to collect the data for each performance measure?*
 Assets Covered **88964 (89)**
 Result Notes **Section 23.4.A and Section 23.4.B describe where Ellensburg gets their data**
31. Question Result, ID, References **Sat, GDIM.QA.PERFMEASUREMONITOR.P, 192.1007(e)**
 Question Text *Do the procedures require the operator to monitor each performance measure?*
 Assets Covered **88964 (89)**
 Result Notes **Section 23.4 and Appendix A Chapter 8**
32. Question Result, ID, References **Sat, GDIM.QA.MEASUREEFFECTIVENESS.P, 192.1007(e)**
 Question Text *When measures are required to reduce risk, does the plan provide/describe what type and/or what specific performance measures will be used to measure effectiveness?*

Assets Covered 88964 (89)

Result Notes Appendix A Chapter 7.1 and Section 23.5

33. Question Result, ID, References Sat, GDIM.QA.IMPLEMENTEV.R, 192.1007(e)

Question Text *Do records demonstrate implementation of the element "Measure Performance, Monitor Results, and Evaluate Effectiveness"?*

Assets Covered 88964 (89)

Result Notes Reviewed records that are used to populate baseline performance measures

GDIM.PE: Periodic Evaluation

34. Question Result, ID, References Sat, GDIM.CA.PERIODICEVAL.P, 192.1007(f)

Question Text *Do the procedures for periodic evaluation include all of the requirements of 192.1007(f)?*

Assets Covered 88964 (89)

Result Notes Appendix A Chapter 8 and Section 22.1.D

35. Question Result, ID, References Sat, GDIM.CA.PERIODICEVAL.R, 192.1007(f)

Question Text *Do records demonstrate implementation of the element "Periodic Evaluation and Improvement"?*

Assets Covered 88964 (89)

Result Notes Section 22 and 23 reviewed/revised annually, SHRIMP has been run annually for the last two years

GDIM.RP: Reporting

36. Question Result, ID, References Sat, GDIM.RR.ANNUALREPORT.P, 192.1007(g)

Question Text *Does the plan contain or reference procedures for reporting, on an annual basis, the four measures listed in 192.1007(e)(1)(i) through (e)(1)(iv) to PHMSA as part of the annual report required by 191.11 and the State regulatory authority?*

Assets Covered 88964 (89)

Result Notes Appendix A Chapter 9 has all four measures listed

37. Question Result, ID, References Sat, GDIM.RR.SUBMITREPORTS.R, 192.1007(g)

Question Text *Has the operator submitted the required reports?*

Assets Covered 88964 (89)

Result Notes All reports submitted prior to March 15

GDIM.MF: Report Mechanical Fitting Failures

38. Question Result, ID, References Sat, GDIM.RR.MECHANICALFITTING.P, 192.1009

Question Text *Are there procedures to collect information necessary to comply with the reporting requirements of 192.1009?*

Assets Covered 88964 (89)

Result Notes Appendix A Chapter 9

GDIM.RC: Records Required to be Kept

39. Question Result, ID, References Sat, GDIM.QA.RECORDREQUIREMENTS.P, 192.1011

Question Text *Are there procedures specifying which records demonstrating compliance with Subpart P will be maintained for at least 10 years?*

Assets Covered 88964 (89)

Result Notes Appendix A Chapter 10

Section 22.1.F

40. Question Result, ID, References **Sat, GDIM.QA.PLANRETENTION.P, 192.1011**
 Question Text *Are there procedures specifying that copies of superseded integrity management plans will be maintained for at least 10 years?*
 Assets Covered **88964 (89)**
 Result Notes **Appendix A Chapter 10**
- Section 22.1.F**
41. Question Result, ID, References **Sat, GDIM.QA.RECORDREQUIREMENTS.R, 192.1011**
 Question Text *Has the operator maintained the required records?*
 Assets Covered **88964 (89)**
 Result Notes **All previous manuals were available for review and spot checked leak records from 2011**

GDIM.IMPL: GDIM Implementation

42. Question Result, ID, References **NA, GDIM.QA.ISSUESIMPL.R, 192.1005**
 Question Text *Have all issues raised in previous DIMP inspections been satisfactorily addressed?*
 Assets Covered **88964 (89)**
 Result Notes **No issues from previous UTC inspections**
43. Question Result, ID, References **Sat, GDIM.RA.OUTSIDESOURCESIMPL.R, 192.1007(b)**
 Question Text *Has the operator identified information or data from external sources (e.g. trade associations, operator's consultants, government agencies, other operators, manufacturers, etc.) that may require re-evaluation of threats and risks?*
 Assets Covered **88964 (89)**
44. Question Result, ID, References **Sat, GDIM.RA.GAPSIMPL.R, 192.1007(a)(3)**
 Question Text *Is missing or incomplete system information and data needed to fill knowledge gaps to assess existing and potential threats being collected?*
 Assets Covered **88964 (89)**
 Result Notes **Ellensburg realized that there have been an increased number of damages due to vehicular damage during winter months so they inspected meter sets in the downtown core to find areas of higher likelihood of damage. Ellensburg installed more bollards for protection based on this inspection program**
45. Question Result, ID, References **Sat, GDIM.RA.SYSINFONEEDSIMPL.R, 192.1007(a)(3)**
 Question Text *Is missing or incomplete system information and data using the procedures prescribed in the DIMP plan being collected?*
 Assets Covered **88964 (89)**
 Result Notes **Ellensburg realized that there have been an increased number of damages due to vehicular damage during winter months so they inspected meter sets in the downtown core to find areas of higher likelihood of damage. Ellensburg installed more bollards for protection based on this inspection program**
46. Question Result, ID, References **Sat, GDIM.RA.OMINFONEEDSIMPL.R, 192.1007(a)(3)**
 Question Text *Has any new or missing information identified or acquired during normal operations, maintenance, and inspection activities been incorporated into the DIMP plan?*
 Assets Covered **88964 (89)**
 Result Notes **Ellensburg personnel conducted inspections to find risers likely to be damaged from vehicular damage and outside force damages. Ellensburg installed bollards to mitigate this risk**
47. Question Result, ID, References **Sat, GDIM.RA.NEWPIPEIMPL.R, 192.1007(a)(5)**
 Question Text *Have required data on any new pipeline installations since August 2, 2011 been captured (e.g., location, wall thickness/SDR, manufacturer, lot/production number)?*
 Assets Covered **88964 (89)**

Result Notes Reviewed pipe data sheets. Form includes all required information

48. Question Result, ID, References Sat, GDIM.RA.DATAFORMIMPL.R, 192.1007(a)

Question Text *Are data collection forms used in conjunction with the operator's DIMP plan being fully and accurately completed?*

Assets Covered 88964 (89)

Result Notes Reviewed Exposed pipe condition reports, Pipe used forms, pressure test reports

49. Question Result, ID, References Sat, GDIM.RA.SMEIMPL.R, 192.1007(a)

Question Text *If Subject Matter Experts (SMEs), is their documented knowledge and experience being appropriately used in the DIMP Program?*

Assets Covered 88964 (89)

Result Notes CP study completed by Corpro Companies Inc. in 2013 and in 2019 by Coffman Engineers. Study to be conducted every 6 years and referenced in Section 23.2.1

50. Question Result, ID, References Sat, GDIM.RA.DEMOUNDERSTANDINGIMPL.O, 192.1007(a)

Question Text *Do operator personnel in the field understand their responsibilities under the DIMP plan?*

Assets Covered 88964 (89)

Result Notes Section 23.1 A and B describe processes that inform field personnel. Field personnel identify DIMP task during their routine activities

51. Question Result, ID, References Sat, GDIM.RA.THREATCATEGORIESIMPL.R, 192.1007(b)

Question Text *Has the operator acquired any new information relevant to system knowledge that may affect its threat identification?*

Assets Covered 88964 (89)

Result Notes Ellensburg has installed bollards based on past incident history. They also remove and replace Perma-seerts (Stab fittings) as they find them

52. Question Result, ID, References NA, GDIM.RA.INFOCONSIDEREDIMPL.R, 192.1007(b)

Question Text *Have any changes occurred that require re-evaluation of threats and risks?*

Assets Covered 88964 (89)

Result Notes No changes that would require re-evaluation

53. Question Result, ID, References Sat, GDIM.RA.IMPLEMENTTHUPDATEIMPL.R, 192.1007(c)

Question Text *Since the last DIMP plan review by the regulatory agency, has the threat identification and risk assessment been updated based on newly acquired information or data relevant to system knowledge?*

Assets Covered 88964 (89)

Result Notes Updated in 2019 and 2020, last UTC inspection was in 2017. Update also included using newest version of SHRIMP

54. Question Result, ID, References Sat, GDIM.RA.IMPLEMENTTHUPDATEPLANIMPL.R, 192.1007(c)

Question Text *If the threat identification and risk evaluation and ranking have been modified, were the revisions made in accordance with the procedure in the DIMP plan?*

Assets Covered 88964 (89)

Result Notes Ellensburg uses updated SHRIMP interview questions

SHRIMP added "other threats" but Ellensburg did not have any. They did identify vehicular damage and that has been incorporated

55. Question Result, ID, References NA, GDIM.RA.SUBDIVIDEADEQIMPL.R, 192.1007(c)

Question Text *Does the current subdivision process (grouping of materials, geographic areas, etc.) adequately meet the need to properly evaluate and rank the existing and potential threats to the integrity of the system?*

Assets Covered 88964 (89)

Result Notes Ellensburg does not subdivide their system

56. Question Result, ID, References NA, GDIM.RA.SUBDIVIDEUPDATEIMPL.R, 192.1007(c)

Question Text *Have the system subdivisions within the risk evaluation and ranking been added to or modified since the last plan review by the regulatory agency?*

Assets Covered 88964 (89)

Result Notes Ellensburg does not subdivide their system

57. Question Result, ID, References NA, GDIM.RA.SUBDIVIDEDIMPIMPL.R, 192.1007(c)

Question Text *If system subdivisions have been added or modified, was it done in accordance with the procedures described in the DIMP plan?*

Assets Covered 88964 (89)

Result Notes Ellensburg does not subdivide their system

58. Question Result, ID, References NA, GDIM.RA.SUBDIVIDERESULTIMPL.R, 192.1007(c)

Question Text *If system subdivisions have been added or modified, did the new system subdivision result in modifications to the risk evaluation and ranking?*

Assets Covered 88964 (89)

Result Notes Ellensburg does not subdivide their system

59. Question Result, ID, References Sat, GDIM.PM.IMPLEMENTPMIMPL.R, 192.1007(d)

Question Text *Does documentation reviewed demonstrate that measures to reduce risks per the DIMP plan are being implemented?*

Assets Covered 88964 (89)

Result Notes Ellensburg has installed new valves in the downtown area, bollards installed, extra patrolling during high water seasons

60. Question Result, ID, References Sat, GDIM.PM.IMPLEMENTPMCOMPLETEIMPL.R, 192.1007(d)

Question Text *Have any measures to reduce risks resulting in the elimination/mitigation of the associated identified threat been completed (e.g., pipe replacement program completed, etc.)?*

Assets Covered 88964 (89)

Result Notes Valves installed every two blocks in downtown area, bollards installed

61. Question Result, ID, References NA, GDIM.PM.IMPLEMENTPMREEVALIMPL.R, 192.1007(d)

Question Text *Have risks been re-evaluated and re-ranked because of the elimination/mitigation of an identified threat?*

Assets Covered 88964 (89)

Result Notes No threats have been fully eliminated/mitigated but re-evaluation is performed annually

62. Question Result, ID, References Sat, GDIM.PM.IMPLEMENTPMSPECIFRISKIMPL.R, 192.1007(d)

Question Text *Does each implemented risk reduction measure identified in the DIMP plan address a specific risk or group of risks?*

Assets Covered 88964 (89)

Result Notes Additional actions identified in Appendix A Chapter 6.2

63. Question Result, ID, References NA, GDIM.PM.LEAKMANAGEMENTIMPL.R, 192.1007(d)

Question Text *Can the operator provide documentation to demonstrate that an effective leak management program is being implemented (answer "N/A" if all leaks are repaired when found)?*

Assets Covered 88964 (89)

Result Notes All leaks are repaired when found

64. Question Result, ID, References Sat, GDIM.QA.IMPLEMENTEVDATAIMPL.R, 192.1007(e)

Question Text *Is data being collected for the required performance measures in 192.1007(e)?*

Assets Covered 88964 (89)

Result Notes All information found in Annual reports

65. Question Result, ID, References Sat, GDIM.QA.IMPLEMENTEVDATADIMPIMPL.R, 192.1007(e)
Question Text *Based on field observations and/or record reviews, is the data used to measure performance being accurately collected in accordance with the procedures in its DIMP plan?*
Assets Covered 88964 (89)
66. Question Result, ID, References Sat, GDIM.QA.IMPLEMENTEVBASLINEIMPL.R, 192.1007(e)
Question Text *Is each performance measure being monitored from an established baseline?*
Assets Covered 88964 (89)
67. Question Result, ID, References NA, GDIM.QA.IMPLEMENTEVRISKIMPL.R, 192.1007(e)
Question Text *Is each performance measure added since the DIMP plan was last updated tied to a specific risk reduction measure or group of measures?*
Assets Covered 88964 (89)
Result Notes Ellensburg has not added any new performance measures
68. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALFREQIMPL.R, 192.1007(f)
Question Text *Have periodic evaluations of the DIMP plan been performed on the frequency specified in the plan? [If a periodic evaluation has not been required since plan implementation or the last inspection, mark questions 27-32 as "N/A".]*
Assets Covered 88964 (89)
Result Notes Evaluation conducted 2019 and 2020
69. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALREQTSIMPL.R, 192.1007(f)
Question Text *Did the periodic evaluation include all required elements?*
Assets Covered 88964 (89)
Result Notes Annual review of the program is completed annually along with evaluation of the DIMP. All elements are included.
70. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALHIRISKIMPL.R, 192.1007(f) (192.1007(e))
Question Text *If any established performance measures indicated an increase in risk beyond an acceptable level (as established in the DIMP plan), were new risk reduction measures implemented along with their associated performance measures?*
Assets Covered 88964 (89)
Result Notes The only measure that had a significant increase was vehicular damage. Ellensburg has addressed this risk by installing bollards in areas of increased risk due to vehicle damage
71. Question Result, ID, References NA, GDIM.CA.PERIODICEVALRISKREDIMPL.R, 192.1007(f)
Question Text *If the periodic evaluation indicates that implemented measures to reduce risks are NOT effective, were risk reduction measures modified, deleted or added?*
Assets Covered 88964 (89)
Result Notes Periodic evaluation has not indicated that measure are not effective
72. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALPRFMESIMPL.R, 192.1007(f)
Question Text *Did the periodic evaluation indicate that the selected performance measures are assessing the effectiveness of risk reduction measures, and, if not, were performance measures modified, deleted or added?*
Assets Covered 88964 (89)
73. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALDIMPIMPL.R, 192.1007(f)
Question Text *Were procedures followed in conducting periodic evaluations and program improvements?*
Assets Covered 88964 (89)
Result Notes Conducted annually per procedure

74. Question Result, ID, References **Sat, GDIM.RR.SUBMITREPORTSIMPL.R, 192.1007(g)**
 Question Text *Were Parts C and D of the PHMSA Distribution Annual Report (Form 7100.1-1) completed in the submission to PHMSA and the state regulatory authority having jurisdiction, if required, for each year since the last inspection?*
 Assets Covered **88964 (89)**
 Result Notes **Annual reports have been submitted by March 15 for the previous year**
75. Question Result, ID, References **NA, GDIM.RR.MECHANICALFITTINGDATAIMPL.R, 192.1009 (191.12)** (also presented in: RPT.RR)
 Question Text *Have accurate records been maintained documenting mechanical fitting failures that resulted in hazardous leaks?*
 Assets Covered **88964 (89)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
76. Question Result, ID, References **NA, GDIM.RR.MECHANICALFITTINGRPTIMPL.R, 192.1009 (191.12)**
 Question Text *Did the operator report all mechanical fitting failures that resulted in a hazardous leak for the previous calendar year to PHMSA and State authorities, as appropriate, by March 15th of the next calendar year, and did the reports contain the information required by Department of Transportation Form PHMSA F-7100.1-2?*
 Assets Covered **88964 (89)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
77. Question Result, ID, References **Sat, GDIM.RR.MECHANICALFITTINGDIMPIMPL.O, 192.1009 (191.12)**
 Question Text *Were procedure(s) followed for collecting the appropriate information and submitting PHMSA Form F-7100.1-2?*
 Assets Covered **88964 (89)**
 Result Notes **Darin Yusi populates the Form 7100.1 using field data. Darin walked me through his process to collect the information**
78. Question Result, ID, References **Sat, GDIM.QA.RECORDREQUIREMENTSIMPL.R, 192.1011**
 Question Text *Are records retained demonstrating compliance with Subpart P, as specified in its DIMP plan, for 10 years (or since 08/02/2011)?*
 Assets Covered **88964 (89)**
 Result Notes **All previous version of the program and SHRIMP were available. Reviewed a sampling of records from 2011**
79. Question Result, ID, References **Sat, GDIM.QA.RECORDREQTSRETAINIMPL.R, 192.1011**
 Question Text *Were copies of superseded DIMP plans retained for 10 years (or since 08/02/2011)?*
 Assets Covered **88964 (89)**
 Result Notes **All previous version of the program and SHRIMP were available. Reviewed a sampling of records from 2011**
80. Question Result, ID, References **Sat, GDIM.QA.RECORDREQTSDIMPIMPL.R, 192.1011**
 Question Text *Were DIMP procedures followed as applicable to records retention?*
 Assets Covered **88964 (89)**
 Result Notes **All previous version of the program and SHRIMP were available. Reviewed a sampling of records from 2011**
81. Question Result, ID, References **NA, GDIM.PI.PERIODICINSPDEVAPPRVIMPL.R, 192.1013(c)**
 Question Text *Has approval been requested or received from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? [If no, mark Subgroup GDIM.IMPL questions 40-44 "N/A".]*
 Assets Covered **88964 (89)**
 Result Notes **Ellensburg has not requested alternate periodic inspection intervals**

82. Question Result, ID, References **NA, GDIM.PI.PERIODICINSPDEVPERFRMIMPL.R, 192.1013(c)**
 Question Text *Have the periodic inspections been implemented and have they been conducted at the specified (approved) alternate intervals?*
 Assets Covered **88964 (89)**
 Result Notes **Ellensburg has not requested alternate periodic inspection intervals**
83. Question Result, ID, References **NA, GDIM.PI.PERIODICINSPDEVREQTIMPL.R, 192.1013(c)**
 Question Text *Have all conditions been complied with that were required as part of the alternate inspection interval approval?*
 Assets Covered **88964 (89)**
 Result Notes **Ellensburg has not requested alternate periodic inspection intervals**
84. Question Result, ID, References **NA, GDIM.PI.PERIODICINSPDEVPRFMESIMPL.R, 192.1013(c)**
 Question Text *Do performance measure records indicate that deviation inspection resources were assigned to higher risk threat(s) and/or that that decreased inspection intervals contributed to an equal or greater overall level of safety has been achieved since the alternate inspection frequency was implemented?*
 Assets Covered **88964 (89)**
 Result Notes **Ellensburg has not requested alternate periodic inspection intervals**
85. Question Result, ID, References **NA, GDIM.PI.PERIODICINSPDEVACTIONIMPL.R, 192.1013(c)**
 Question Text *If that an equal or greater overall level of safety has not been achieved, has corrective action been taken?*
 Assets Covered **88964 (89)**
 Result Notes **Ellensburg has not requested alternate periodic inspection intervals**

RPT.RR: Regulatory Reporting (Traditional)

86. Question Result, ID, References **NA, GDIM.RR.MECHANICALFITTINGDATAIMPL.R, 192.1009 (191.12)** (also presented in: GDIM.IMPL)
 Question Text *Have accurate records been maintained documenting mechanical fitting failures that resulted in hazardous leaks?*
 Assets Covered **88964 (89)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Report Parameters: Results: all

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.