



May 13, 2019

re: Response to 2019 Biogas Standard Inspection - Klickitat PUD - (Insp. No. 7819)

Sean Mayo
Pipeline Safety Director
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
Olympia WA, 98504-7250

Dear Mr. Mayo:

Please find attached the Klickitat Public Utilities District response to the 2019 Biogas Standard Inspection - Klickitat PUD - (Insp. No. 7819)

Should you have any questions please do not hesitate to contact us directly.

Sincerely,

A handwritten signature in blue ink, appearing to be 'Jim Smith', with a large, stylized flourish extending to the right.

Jim Smith
General Manager
Klickitat Public Utilities District, Goldendale WA

cc Cosentino Consulting Inc.
Pipeline facility files

Response to 2019 Biogas Standard Inspection - Klickitat PUD - (Insp. No. 7819)

1. **49 CFR 192.615(c) Emergency plans**

(c) Each operator shall establish and maintain liaison with appropriate fire, police, and other public officials to:

- (1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency;*
- (2) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency;*
- (3) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and*
- (4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.*

Finding(s):

Operator did not have documentation supporting any liaison with appropriate fire, police, or other public officials.

Response:

KPUD has offered to liaison with the appropriate fire, police, or other public officials. This effort is documented on O&M form F-36 and is presented as Attachment 1 to this response.

2. **49 CFR 192.614(c)(1) Damage prevention program**

(c) The damage prevention program required by paragraph (a) of this section must, at a minimum:

- (1) Include the identity, on a current basis, of persons who normally engage in excavation activities in the area in which the pipeline is located*

Finding(s):

Operator did not have a written damage prevention program. Operator did not identify persons who normally engage in excavation in the area of the pipeline.

Response:

KPUD had an established, written damage prevention program at the time of the audit as outlined in section 5 of the pipeline O&M manual which was submitted to the Commission prior to commencing operations. The entirety of O&M section 5 is presented as Attachment 4

The requirement to establish excavator lists is satisfied by membership and participation with a one call program including outreach efforts and excavator education. KPUD is a long-time active member of the regional one call program for its electric operations.

KPUD has added its pipeline assets to the regional one call program as demonstrated by Attachment 2 which verifies the addition of the pipeline assets to the program.

KPUD has added its pipeline assets to the National Pipeline Mapping System as demonstrated by Attachment 3

3. **49 CFR 192.614(c)(3) Damage prevention program**
(3) Provide a means of receiving and recording notification of planned excavation activities.

Finding(s):

Operator did not have a written damage prevention program. Operator did not have a means of receiving and recording notifications of planned excavations.

Response:

KPUD had an established, written damage prevention program at the time of the audit as outlined in section 5 of the pipeline O&M manual which was submitted to the Commission prior to commencing operations. The entirety of O&M section 5 is presented as Attachment 4

At the time of inspection KPUD had not uploaded the pipeline GIS files of its pipeline assets to the one call system or NPMS. The upload has been completed and the pipeline assets are now part of KPUD's listed assets.

Confirmation the upload of the pipeline GIS files to the one call system and NPMS has been accomplished is presented as Attachment 2 to this response.

4. **49 CFR 192.614(c) Damage prevention program**
(c) The damage prevention program required by paragraph (a) of this section must, at a minimum:

- (1) Include the identity, on a current basis, of persons who normally engage in excavation activities in the area in which the pipeline is located.*
- (2) Provides for notification of the public in the vicinity, of the pipeline end actual notification of the persons identified in paragraph (c)(1) of this section of the following as often as needed to make them aware of the damage prevention program:*
- (i) The program's existence and purpose; and*
- (ii) How to learn the location of underground pipelines before excavation activities are begun.*
- (3) Provide a means of receiving and recording notification of planned excavation activities.*
- (4) If the operator has buried pipelines in the area of excavation activity, provide for actual notification of persons who give notice of their intent to excavate of the type of temporary marking to be provided and how to identify the markings.*
- (5) Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.*
- (6) Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:*
- (i) The inspection must be done as frequently as necessary during and after the activities to verify the integrity of the pipeline; and*
- (ii) In the case of blasting, any inspection must include leakage surveys.*
- (d) A damage prevention program under this section is not required for the following pipelines:*

Finding(s):

Operator did not have a written damage prevention program. Operator did not present a Damage prevention program that covered the minimum requirements listed in 49CFR192.614(c)

Response:

KPUD had an established, written damage prevention program at the time of the audit as outlined in section 5 of the pipeline O&M manual which was submitted to the Commission prior to commencing operations. The entirety of O&M section 5 is presented as Attachment 4

Each of the items required in a damage prevention program is contained in section 5 of the O&M manual which is presented as Attachment 3

5. 49 CFR 192.615(c) Emergency plans

(c) Each operator shall establish and maintain liaison with appropriate fire, police, and other public officials to:

- (1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency;*
- (4) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency;*
- (5) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and*
- (4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.*

Finding(s):

Operator did not have documentation supporting any liaison with appropriate fire, police, or other public officials.

Response:

KPUD has offered to liaison with the appropriate fire, police, or other public officials. This effort is documented on O&M form F-36 and is presented as Attachment 1 to this response.

6. 49 CFR §192.616(0) Public Awareness

(g) The program must be conducted in English and in other languages commonly understood by a significant number and concentration of the non-English speaking population in the operator's area.

Finding(s):

Operator did not provide records showing a program that provided materials written in other languages commonly understood.

Response:


KPUD had an established, written continuing public education program at the time of the audit as outlined in section 5.3 of the pipeline O&M manual which was submitted to the Commission prior to commencing operations. The entirety of O&M section 5 is presented as Attachment 4

The specific requirement that the program must be conducted in English and in other commonly understood languages is contained in section 5.3.2

For reference, according to the latest US Census, 80.1% of the Klickitat county population speak English.

At the time of the audit no records were available for review since the pipeline had just entered service.

ATTACHMENT 1
Liaison with Public Officials

	Date Issued April 13, 2018	Page No. 1 of 1	Reference 49 CFR 192.615(C)
ISSUED	Revision # 0	Subject: FORM F-36 Documenting First Responder Liaison Efforts	

DOCUMENTATION OF FIRST RESPONDER LAISON EFFORTS

These agencies are to be visited once per calendar year.

Date of Visit	KPUD Employee	Agency Visited	Was a Person of Authority Visited?	Was First Responder Booklet Delivered?
5-8-19 (Email)	Doug Senn	Klickitat County Sheriff	yes Mike Kallio	yes
1-24-19	Jeff Link	Fire District	yes Justin Bentley Fire Chief	yes
5-9-19	Kevin Ricles	Washington State Police (Goldendale Office)	no Patty	yes

ATTACHMENT 2
Verification of Pipeline GIS Upload to One Call System

Doug Senn

From: DBA- Utility Notification Center <ordatabase@occinc.com>
Sent: Tuesday, May 7, 2019 8:26 AM
To: Doug Senn
Cc: ordatabase@occinc.com
Subject: KLKPU03- KLICKITAT CO P.U.D.

Hi Doug,

This email is to confirm that KLICKITAT CO P.U.D., District Code KLKPU03, has online coverage in Klickitat county.

Thanks,

--

Cris Jesse
Database Administrator
Utility Notification Center
Tel #: (877) 668-4001
Fax #: (877) 695-2466
Email: ordatabase@occinc.com
305 NE 102nd Ave, Suite 300
Portland, OR 97220

Doug Senn

From: julieh <julieh@occinc.com>
Sent: Wednesday, November 21, 2018 2:55 PM
To: Doug Senn
Cc: ordatabase@occinc.com
Subject: Klickitat County PUD

Categories: Red Category

Hi Doug,

We show that Klickitat Pud is registered in the State of Washington.
These are the district codes I find and the counties they have coverage in:

KLCPUD01 - KLICKITAT COUNTY PUD #1 (BENTON)

KLKPUD01 - KLICKITAT CO P.U.D. (KLICKITAT, SKAMANIA, YAKIMA)

KLKPUD02 - KLICKITAT CO P.U.D. (KLICKITAT, YAKIMA)

KLKWWW01 - KLICKITAT CO P.U.D. (KLICKITAT)

To request access to iMap to view/edit/approve your coverage areas online for free, please send us an email with the following information for each person you'd like to request access for:

- district code(s)
- person's name
- person's phone #
- person's email address

Please let us know if you need anything further. Thanks.

--

Julie Hernandez
Database Administrator
Utility Notification Center
Tel #: (877) 668-4001
Fax #: (877) 695-2466
Email: ordatabase@occinc.com
305 NE 102nd Ave, Suite 300
Portland, OR 97220

ATTACHMENT 3
Verification of NPMS GIS Upload

From: Doug Senn <DSenn@klickpud.com>
Sent: Friday, May 10, 2019 1:30 PM
To: bob@cosentinoconsulting.com
Cc: Kevin Ricks
Subject: FW: OPID 39809 NPMS OSAVE Data Report - Passed
Attachments: SLFGSCANNER19050820040.pdf; SLFGSCANNER19050820010.pdf

Here is NPMS proof of submission, attached you will find the rest need to complete the compliance list and submission to UTC. Let me know ASAP if there is anything missing so we can get it taken care of on time. I will consider this issue closed if not hear from you. I am also under the impression that you will submit docs for us.

thanks

From: npms@dot.gov [mailto:npms@dot.gov]
Sent: Friday, May 10, 2019 1:17 PM
To: Doug Senn <DSenn@klickpud.com>; Doug Senn <DSenn@klickpud.com>
Subject: OPID 39809 NPMS OSAVE Data Report - Passed

OSAVE NOTIFICATION

Report Findings for Uploaded Data.

Session Details:

Session ID: 9372
Operator: KCLICKITAT PUBLIC UTILITY DISTRICT (39809)
Submission Type: Upload Geospatial and Attribute Data
Submission Intent: Replacement
Submission Format: SHP
Incorporated Attributes: Yes
Submitted By: dsenn@klickpud.com
Submitted Date: 05/10/2019 04:17:11 PM

Phase 1 (Automated) QC Details:


RNG_Pipeline_CL.shp: No issues were found in the data.

Phase 1 (Automated) Evaluation Outcome:

Phase 1 QC validation completed. No errors were found. The submission has been placed in the queue for NPMS staff to continue with additional QC and processing workflows. If NPMS staff identify any errors in subsequent QC and processing phases, they will notify the technical and primary contact to seek corrections or clarification. If this submission is acceptable, the technical and primary contacts will receive a receipt for your records to indicate that the NPMS submission requirement was met for this OPID this year. As well, both contacts will be notified once the new submission is available in NPMS web map viewers.

Until your submission has passed through all QC and processing workflows without errors, you have not met the NPMS submission requirement (49 CFR 191.29 or 49 CFR 195.61) for this calendar year.

ATTACHMENT 4
O&M Section 5, Damage Prevention Program

	Date Issued April 13, 2018	Page No. 1 of 6	Reference PHMSA Part 192.605
ISSUED	Revision # 0	Subject: OPERATIONS AND MAINTENANCE MANUAL	

5 DAMAGE PREVENTION PROGRAM


5.1 Scope

This section establishes the Company policy to improve Operational safety by increasing the Public's awareness of the Pipeline and their general knowledge of Pipeline safety issues.

5.2 Preventing Third-party Damage

[§192.614(a) & (c)]

- .1 The Company participates in the One Call program in it's operating area to reduce the chances of damage to the Pipeline from Excavation or other activity that could impart physical forces and damage.
- .2 At minimum, the program includes:
 - a. Establishing the identity of persons or companies that typically engage in Excavation activities in the vicinity of the Pipeline. The listing of persons or companies shall be updated annually.
 - b. Annual contact of excavators through mailing or some other means, with information concerning the existence and purpose of the damage prevention program. Also included will be information concerning the need to contact the local One-call system prior to excavating.
 - c. Notification of the public in the vicinity of the Pipeline as to the presence of the Pipeline in their area, hazards associated with unintended releases, and how to recognize and respond to an Emergency.
 - d. The receiving and recording of notifications of planned Excavation activities. Records of notification and inspection shall be retained in accordance with the requirements of Section 1.11.3 of this manual
 - e. Refer to Procedure P-1 for marking instructions prior to commencement of Excavating activity.
 - f. Requirements for a Company representative to witness and inspect Excavating activities that are within 10-feet of the buried Pipeline. Results of inspection shall be recorded and retained with notification record.

	Date Issued April 13, 2018	Page No. 2 of 6	Reference PHMSA Part 192.605
ISSUED	Revision # 0	Subject: OPERATIONS AND MAINTENANCE MANUAL	

5.3 Continuing Public Education


[§192.616]

- .1 The purpose of continuing education is to enable the public, appropriate government organizations, and persons engaged in excavation related activities to recognize a gas Pipeline emergency for the purpose of reporting it to the Company or the appropriate Emergency Services provider.
- .2 The Pipeline Manager or his designee shall establish and maintain a continuing public education program in conformance to §192.616 and American Petroleum Institute Recommended Practice 1162. The program must be conducted in English and in other languages commonly understood by a significant number and concentration of the non-English speaking population in the Operating area.
- .3 The Company will submit its continuing public education program to PHMSA/OPS as required.
- .4 The program shall target the public, appropriate government organizations, schools (if any in proximity) and persons engaged in Excavation activities.
- .5 The following will be the minimum information communicated through this program:
 - a. Requirement for use of the One-call program prior to Excavation.
 - b. Facts about the Gas transported.
 - c. Hazards associated with high pressure, natural gas and unintended release.
 - d. Recognition of unintended release from Pipeline Facilities.
 - e. How to identify a Pipeline marker.
 - f. Importance of recognizing and reporting an Emergency.
 - g. How to report an Emergency to the Company and Emergency Services.
 - h. What action should be taken in an Emergency or if a leak is detected.

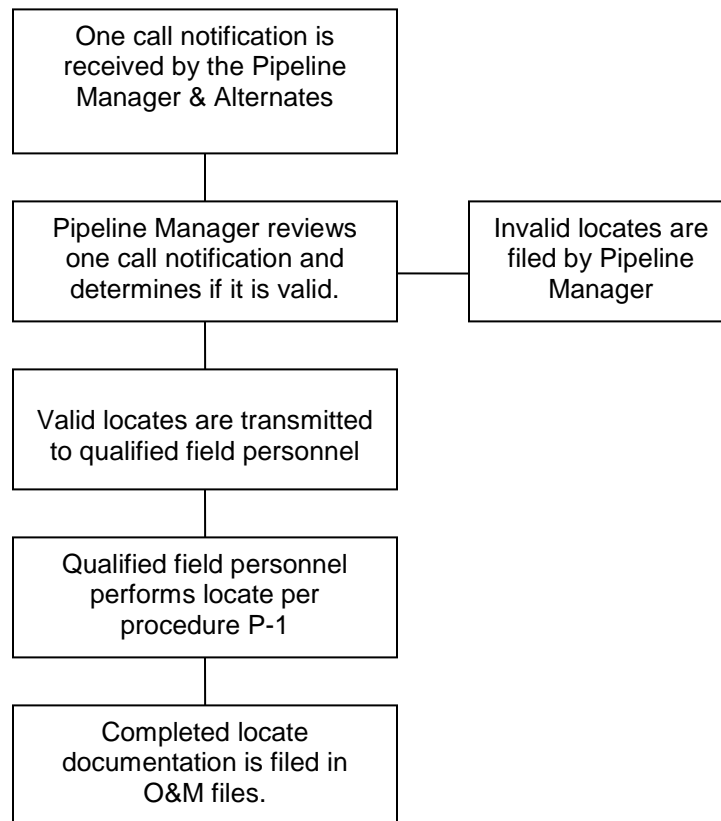
5.4 One-Call Program

[§192.614 (b)]


- .1 The Company is a member of the One-call Program where it operates.
- .2 The Pipeline Manager shall maintain the company as a member and participant in these One-call Programs.
- .3 The Company will respond to all excavation notices and will install temporary markers to indicate the location of the Pipeline if potential conflict exists.

	Date Issued April 13, 2018	Page No. 3 of 6	Reference PHMSA Part 192.605
ISSUED	Revision # 0	Subject: OPERATIONS AND MAINTENANCE MANUAL	

.4 The process is as follows;



- .5 If a situation arises that may endanger the Pipeline, such as an uncooperative Excavator, the Employee shall:
- a. Inform the Excavator of the unsafe condition and the Company's responsibility to safeguard the Public and the Environment.
 - b. Explain the Company's policy regarding construction near the Pipeline.
- .6 If the Excavator continues to endanger the Pipeline, the Employee shall notify the Pipeline Manager who will contact the appropriate local Fire Department and/or Law Enforcement, and explain the potential hazard, and request the project be terminated until the unsafe condition is corrected.
- .7 The Company will inspect the pipeline if it is determined that it could have been damaged during the excavation.

	Date Issued April 13, 2018	Page No. 4 of 6	Reference PHMSA Part 192.605
ISSUED	Revision # 0	Subject: OPERATIONS AND MAINTENANCE MANUAL	

5.5 Pipeline Signage

[§192.707]
[WAC 480-93-124]

When the Pipeline was installed, continuous warning tape was buried in the ditch approximately 1.5 - 2.5 feet above the pipe to warn anyone excavating over the Pipeline.


- .1 Signage and markers will be installed in sufficient numbers to provide indication of the Pipeline in a given area. At minimum signage for buried pipe shall be located at the following locations;
 - a. At each crossing of a public road or
 - b. At both sides of railroad crossings.
 - c. At each crossing of a high pressure oil, gas, or natural gas liquids pipeline.
 - d. At both sides of a canal, ditch, creek, or other waterway.
 - e. At each above-ground structure of the Pipeline.
 - f. At both sides of bridge or overhead crossings.
 - g. At distances no greater than 1,320 feet apart.

- .2 The Company will install signage at all above ground pipe accessible to the public.

- .3 The Company warning signage is designed accordance with §192.707(d) including the following information:
 - a. WARNING
 - b. Type of Pipeline (Gas, Natural Gas)
 - c. Name of Operator
 - c. Emergency telephone numbers
 - d. Excavation warning

- .4 The lettering on the signs must be at least 1" tall with 1/4" stroke. The lettering and background of must be of high contrast.

- .5 Location of installed pipeline markers is recorded on form F- 34.

	Date Issued April 13, 2018	Page No. 5 of 6	Reference PHMSA Part 192.605
ISSUED	Revision # 0	Subject: OPERATIONS AND MAINTENANCE MANUAL	

- .6 Signage and markers shall be inspected annually during a scheduled surveillance or patrols. Procedure P-37
- .7 Signs or markers that are reported as missing or damaged must be replaced within 45 days of their discovery.

5.6 Pipeline Locating and Marking


[\$192.614(c)(5)]

- .1 The Pipeline Manager is responsible for the locating and marking of underground facilities.
- .2 The Pipeline Manager will use the pipe locating and marking Procedure P-1 located in Appendix H of this manual which contains the following minimum requirements.
 - a. Specifying appropriate tools for accurately locating and marking the Pipeline.
 - b. Instructions that only horizontal location information be marked. Under no circumstances shall depth information be given when using pipe locators.
 - c. Procedures for determining depth of the Pipeline.
 - d. Standards for type of markers and ground markings to be installed, including color and style of markings and specific company identification. Standards shall conform to the most stringent requirements of State On-call Programs applicable to the Pipeline.
- .3 The pipeline will be inspected if it could have been damaged during the excavation.

5.7 Pipe Excavating Procedure

[\$192.614(c)(5) & (6)]

- .1 The Pipeline Manager is responsible for the conducting or overseeing Excavation associated with the Pipeline.
- .2 The Pipeline Manager will use the Excavation Procedure P-2 located in Appendix H of this manual which contains the following minimum requirements.
 - a. Procedures for locating the line with the appropriate locating equipment;
 - b. Procedures for appropriately marking the Pipeline.
 - c. Identification of other utilities or substructures in the work area prior to excavation.

	Date Issued April 13, 2018	Page No. 6 of 6	Reference PHMSA Part 192.605
ISSUED	Revision # 0	Subject: OPERATIONS AND MAINTENANCE MANUAL	

- d. Full-time inspection by a Qualified person during Excavation within ten feet of the Pipeline, foreign line crossings, and other significant surface Operations near or over the Pipeline. The Pipeline Manager may waive this requirement as appropriate.
 - e. Requirement for a leak survey after nearby blasting Operations.
- .3 The pipeline will be inspected if it could have been damaged during the excavation.

5.8 Excavated Trench Safety

[§192.605(b)(9)]

1. In accordance with 49CFR 192.605(b)(9), whenever a trench is excavated to perform maintenance or emergency operations on the Pipeline, the Pipeline Manager shall take adequate precautions to protect personnel from the hazards of unsafe accumulations of vapor or gas, including, but not necessarily limited to, the following items:
 - a) Placement of one or more LEL gas detectors with an alarm in the trench or on the personnel working in the trench.
 - b) Measurement of the percent gas level present in the trench before work commences, at appropriate intervals during the work and after each work break.
 - c) Having present at the work site, if necessary, the following emergency rescue equipment:
 - I. Breathing apparatus.
 - II. Rescue harness.
 - III. Rescue line.