

Form A- Annual Review 8431

UTC Standard Annual Review Inspection Report
 Intrastate Operators
 FORM A: Annual Review

Inspector and Operator Information

Inspection ID 8431	Inspection Link 8431	Inspector - Lead Derek Norwood	Inspector - Assist
Operator City of Enumclaw	Unit City of Enumclaw - Gas Department	Records Location - City & State Enumclaw, WA	
Inspection Start Date 05-04-2022	Inspection Exit Interview Date 05-17-2022	Engineer Submit Date 05-23-2022	

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

This inspection was a review of City of Enumclaw's manual revisions, annual reports, incidents from 2021 and PHMSA advisory bulletins.

Facilities visited and Total AFOD

The inspection was completed at Enumclaw's office. No gas facilities were visited.
 1 AFODs

Summary of Significant Findings
 (DO NOT Discuss Enforcement options)

There are no probable violations or areas of concern as a result of this inspection.

Primary Operator contacts and/or participants

Nick Peelo
 Gas Utility Manager

AJ Haas
 Gas Engineer

Operator executive contact and mailing address for any official correspondence

Mr. Jan Molinaro
 Mayor
 2041 Railroad St
 Enumclaw, WA 98022

Instructions and Ratings Definitions

INSPECTION RESULTS: Annual Review

Satisfactory Responses 20	Satisfactory List 1,5,6,9,10,13,14,15,16,22,23,24,25,26,27,31,32,35,37,	Number of Unanswered Questions 0	Unanswered List
Unsatisfactory Responses 0	Unsatisfactory List		
Area of Concern Responses 0	Area of Concern List		
Not Applicable Responses 18	Not Applicable List 3,4,7,8,12,17,18,19,20,21,28,29,30,39,40,42,43,44		
Yes Responses 2	Yes List 34,36,	No Responses 2	No List 38,41
Not Checked / Evaluated Responses 0	Not Checked / Evaluated List		

**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.

Crew Inspection History

Click Link for Full List of Crew Inspections

Determination crew inspection Date	Inspector	Operator	Unit	Type of Work	Foreman Name	Contractor Name	Comments / Observations for Operator
10-10-2022	Scott Anderson	City of Enumclaw	City of Enumclaw - 7911	Main Extension	Kelly Oles		
02-22-2022	Scott Anderson	City of Enumclaw	City of Enumclaw - 7911	Main Install	Chuck Speece		

Facility Inspection History

Link for Full List of Facility Inspections

Date	Inspection ID	Form A Operator Name	Other Company	Inspector	Type of Inspection	Do you have inspection pictures or file attachments?
04-26-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
04-26-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes

Date	Inspection ID	Form A Operator Name	Other Company	Inspector	Type of Inspection	Do you have inspection pictures or file attachments?
04-26-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
04-26-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
04-26-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
04-26-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
04-26-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
04-26-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
03-16-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
03-16-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
03-16-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
01-11-2023	7911	City of Enumclaw		David Cullom	Pre-Field	No
01-11-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
01-11-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
01-11-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
01-11-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
01-11-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
01-11-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
01-11-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
01-11-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
01-11-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
01-11-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
01-11-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
01-04-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
01-04-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
01-04-2023	7911	City of Enumclaw		David Cullom	Pre-Field	Yes
03-08-2022	7911	City of Enumclaw		Darren Tinnerstet	Facility	Yes
03-08-2022	7911	City of Enumclaw		Darren Tinnerstet	Facility	Yes
03-08-2022	7911	City of Enumclaw		Darren Tinnerstet	Facility	Yes
03-08-2022	7911	City of Enumclaw		Darren Tinnerstet	Facility	Yes

Scheduled Inspection History

Annual Review Inspection History

Year of Inspection	Facility - Operator	Unit Name	Inspection ID	Inspection Type	Inspection Status	Closed Date	Next Inspection Interval	SHAREPOINT
City of Enumclaw (13 Inspection records)								
2023	City of Enumclaw	City of Enumclaw- Natural Gas Department	8596	Standard - Annual Review	Complete	06-13-2023	05-19-2024	Documents
2023	City of Enumclaw	City of Enumclaw- Natural Gas Department	8597	OQ - Operator Qualification	Complete	06-13-2023	05-19-2027	Documents
2023	City of Enumclaw	City of Enumclaw- Natural Gas Department	8598	DIMP - Gas Distribution Integrity Management	Complete	06-13-2023	05-19-2026	Documents
2023	City of Enumclaw	City of Enumclaw- Natural Gas Department	8599	Standard Comprehensive - GD	Complete	06-13-2023	05-19-2026	Documents
2022	City of Enumclaw	City of Enumclaw- Natural Gas Department	8430	OM PPR GAS - Operations & Maintenance, Plans & Procedures Review	Complete	06-02-2022	05-17-2026	Documents
2022	City of Enumclaw	City of Enumclaw- Natural Gas Department	8431	Standard - Annual Review	Complete	06-02-2022	05-17-2023	Documents
2022	City of Enumclaw	City of Enumclaw- Natural Gas Department	8504	Section 114	Complete	06-02-2022	05-17-2023	Documents
2021	City of Enumclaw	City of Enumclaw- Natural Gas Department	8263	PA - Public Awareness	Complete	04-19-2021	04-05-2025	Documents
2021	City of Enumclaw	City of Enumclaw- Natural Gas Department	8264	Standard - Annual Review	Complete	04-19-2021	04-05-2022	Documents
2020	City of Enumclaw	City of Enumclaw- Natural Gas Department	8060	Standard Comprehensive - GD	Complete	08-17-2020	07-23-2023	Documents
2020	City of Enumclaw	City of Enumclaw- Natural Gas Department	8061	DA - Drug & Alcohol	Complete	07-30-2020	07-28-2024	Documents
2020	City of Enumclaw	City of Enumclaw- Natural Gas Department	8062	DIMP - Gas Distribution Integrity Management	Complete	08-17-2020	07-29-2023	Documents
2020	City of Enumclaw	City of Enumclaw- Natural Gas Department	8065	Standard - Annual Review	Complete	07-30-2020	07-22-2021	Documents

GAS System Operations History

Annual Report - Miles of Main

Annual Report GAS Transmission Miles

Year	Operator	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length

Year	Operator	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length
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

YEAR	Total Total Miles	e. Total tool mileage inspected in calendar year using in-line inspection tools
No Report records found		

Annual Report - Leaks

Year	Operator	Cause of Leak Mains Total	Cause of Leak Mains Hazardous Total	Cause of Leak Services Total	Cause of Leak Services Hazardous Total	NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR
2022	City of Enumclaw	0	0	32	0	0
2021	City of Enumclaw	1	0	29	3	0
2020	City of Enumclaw	5	2	28	3	0
2019	City of Enumclaw	0	0	14	8	0
2018	City of Enumclaw	2	1	20	4	0
2017	City of Enumclaw	1	0	17	5	0
2016	City of Enumclaw	1	1	11	4	0
2015	City of Enumclaw	0	0	13	5	0

Annual Report - EFV

Operator	Year	Number of EFV's Installed This Calendar Year on Single Family Residential Services:	Estimated Number of EFV's in the system at the End of The Year:	Total Number of Services with EFV Installed During Year:	Estimated Number of Services with EFV In The System At The End of The Year:	* Total Number of Manual Service Line Shut-off Valves Installed During Year:	* Estimated Number of Services with Manual Service Line Shut-off Valves Installed in the System at End of Year:
City of Enumclaw	2022	48	1387	0			84
City of Enumclaw	2021	96	1339			1	84
City of Enumclaw	2020			232	1243	2	84
City of Enumclaw	2019			181	967	2	79
City of Enumclaw	2018			113	842	0	0
City of Enumclaw	2017	33	729			0	0
City of Enumclaw	2016	68	696				
City of Enumclaw	2015	100	628				
City of Enumclaw	2014	75	528				
City of Enumclaw	2013	28	453				
City of Enumclaw	2012	38	425				
City of Enumclaw	2011	56	387				
City of Enumclaw	2010	68	331				
TOT		610	6903	526	3052	5	331

HL System Operations History

HL Annual Report - Miles of Pipe by Decade

YEAR	Operator	Commodity Group	Part I - Total Miles of Pipe by Decade	Unknown	Pre-20s	1920-1929	1930-1939	1940-1949	1950-1959	1960-196
No Report records found										

HL Annual Report - HL Miles / HCAs

YEAR	Operator	Commodity Group	Total Segment Miles that Could Affect HCAs	High Population	Other Population	Drinking Water	Ecological Resource	Comm Navigable Water	YEAR
No Report records found									
No Report									

ANNUAL REPORT: ACCURACY/TRENDS

Question #1.

Was the Annual Report reviewed for accuracy and trends? If any trends were discovered, please describe.

1. Result

Satisfactory

1. Notes

Access to Complete Distribution Annual Report

Year	Operator	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length
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
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:	Locating Practices Not Sufficient:	One-Call Notification Practices Not Sufficient:	Excavation Practices Not Sufficient:	Other:	Number of Services	Total Leaks - Excavation Damage	Total Main Leaks	Miles of Service MAIN	Number of Leaks per Mile of MAIN
2022	City of Enumclaw	2081	9	0	3	6	0	5072	0	0	119.9	
2021	City of Enumclaw	2434	2	0	0	2	0	5038	0	116.731	78.72	
2020	City of Enumclaw	1905	5	1	1	3	0	4949	4	4	114.9	2.05
2019	City of Enumclaw	2002	8	1	1	5	1	4742				
2018	City of Enumclaw	1519	5	1	0	4	0	4489				
2017	City of Enumclaw	711	5		1	3	1	4321				
2016	City of Enumclaw	639	5	0	0	3	2	4290				
2015	City of Enumclaw	664	5	0	0	3	2	4246				

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 d

Late	no	Totals
SubmitCompanyID - UTCfinalName	Number of Reports	Number of Reports
City of Enumclaw	10	10
Totals (1 groups)	10	10

Question #2.

Review the following damage prevention items:

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

Yes

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

Yes

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

Have process in place and used during event in 2020

Q2.e. Is the operator or its contractor qualified and following procedures for l

Reviewed sampling of OQs for locating pipeline

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 t
0

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

Q2.k. Does the operator follow a process to evaluate causes for damages list
2-G-6(e)

2. Notes

NPMS SUBMISSIONS/CHANGES

Question #3.

For transmission operators, has the operator submitted information to the NPMS database, along with changes made after the original submission? Not Applicable

3. Result

3. Notes

No transmission

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

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
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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 (HL) to determine cause of failure? Is the operator taking appropriate steps to minimize the possibility of recurrence?

5. Result
Satisfactory

5. Notes

Enumclaw had no reportable events in 2021. I reviewed non-reportable report for damage to 1/2" PE service, no concerns. Enumclaw had an issue with an excavator not requesting locates but has since worked to remedy the problem via public outreach. They will be attending the 2022 Enumclaw Street fair to give 811 information.

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
Satisfactory

Q6: Incident Reports

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

6. Notes

No reportable events occurred in 2021, reviewed non-reportable report for damage to 1/2" PE service, no concerns

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	SafetyRelatedConditionChoices	Reportable?	Date & Time of Incident	Company Notified Date	Report Date
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No Incident Notification records found

7. Notes

Question #8.

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

8. Result
Not
Applicable

8. Notes

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

Many revisions in 2021 such as Electrofuse procedure update, OQ task list update, Gas Breaker Calculator for EFV added, Section 114

Question #10.

If changes to the O&M were made, are changes acceptable?

10. Result

Satisfactory

10. Notes

Reviewed a sampling of updates, Full O&M review being performed this year (ID 8430) will review all procedures

Question #11.

Were emergency plans changed during the previous year?

11. Result

Satisfactory

11. Notes

Reviewed but no changes

Question #12.

Were any changes to emergency plans satisfactory?

12. Result

Not Applicable

12. Notes

INTEGRITY MANAGEMENT PROGRAMS

Question #13

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

13. Result

Satisfactory

13. Notes

City of Enumclaw uses SHRIMP, their processes have not changed but the data changes year-to-year, reviewed SHRIMP data

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

Effectiveness evaluation performed every year, reviewed evaluation from 2020

Question #15

Are IMP program changes acceptable?

15. Result

Satisfactory

15. Notes**Question #16**

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

16. Results

Satisfactory

16. Notes

Replacing farm taps where needed and have plan to replace all steel service lines with PE

Question #17

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

17. ResultsNot
Applicable**17. Notes**

Enumclaw has no transmission pipelines

Question #18

What assessment work is planned for the upcoming year?

18. ResultsNot
Applicable**18. Notes****Question #19**

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

19. ResultsNot
Applicable**19. Notes****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 ADB review section)

20. ResultsNot
Applicable**20. Notes****Question #21**

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

21. ResultsNot
Applicable**21. Notes**

Continue to monitor but there have been no indications of defects on PE

Question #22**22. Results**

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

Satisfactory

22. Notes

Replaced two farm taps in 2020 and one in 2021, 3 services replaced due to atmospheric corrosion

Question #23

What DIMP remediation work is anticipated for upcoming year?

23. Results

Satisfactory

23. Notes

Ongoing maintenance and replacement of services as needed

OQ PROGRAM

Question #24

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

24. Results

Satisfactory

24. Notes

No significant changes to the program, updated task list

Question #25

Are the OQ plan updates satisfactory?

25. Results

Satisfactory

25. Notes

Question #26

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

26. Results

Satisfactory

26. Notes

Reviewed a sample of personnel OQs, 6 personnel perform OQ tasks

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. Results

Satisfactory

27. Notes

Review performed October 26, 2021, no changes

Question #28

Are changes to the PA program satisfactory?

28. Results

Not Applicable

28. Notes

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. Results

Not Applicable

29. Notes

Question #30

Are the CRM program changes satisfactory?

30. Results

Not Applicable

30. Notes

SAFETY MANAGEMENT SYSTEM API 1173

Question #31

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

31. Results

Satisfactory

31. Notes

Implemented incident reporting form, looking to get copy API 1173

INSPECTOR ASSESSMENT OF INSPECTION UNITS

Question #32

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

32. Results

Satisfactory

32. Notes

Q32: List of current inspection units

Unit Name	Distribution/Transmission	Intrastate or Interstate?	GAS or LIQUID	UTC Unit ID	UTC Operator ID
City of Enumclaw (1 Unit)					
City of Enumclaw- Natural Gas Department	Distribution	Intrastate	Gas	90	115

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.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 Leak/Damage Recognition ; Q33.M Emergency Preparedness

33. Notes

ADVISORY BULLETIN REVIEW

Question #34

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

34. Results
YES

ADB 2019-01

ADB 2019-01 Flood Mitigation

34. Notes

Focus area on 6-month bridge patrols and special leak surveys would be done following flooding

Question #35

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

ADB 2019-01

ADB 2019-01: Flood Mitigation

35. Notes

Focus area on 6-month bridge patrols and special leak surveys would be done following flooding

Question #36

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

ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

36. Notes

Leak survey following seismic event

O&M Section 2-D-2.6

Question #37

If "YES" to Q36, did the operator take appropriate action according to ADB 2019-02? Discuss suggested actions from ADB with operator's representative and annotate any concerns.

ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

37. Notes

Leak survey following seismic event

O&M Section 2-D-2.6

Question #38

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

ADB 2020-01

ADB 2020-01 Inside Meter Sets

38. Notes**Question #39**

If operator's system has indoor meter sets/regulators, did the operator review ADB 2020-0115? 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 2020-01

ADB 2020-01 Inside Meter Sets

39. Notes**Question #40**

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

ADB 2020-01

ADB 2020-01 Inside Meter Sets

40. Notes**Question #41**

Does the operator have any low pressure systems?

ADB 2020-02

ADB 2020-02 Low Pressure Systems

41. Notes**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 2020-02

ADB 2020-02 Low Pressure Systems

42. Notes**Question #43**

For low pressure construction/maintenance projects, does the operator have a process for review of engineering plans and constructibility 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 2020-02

ADB 2020-02 Low Pressure Systems

43. Notes**Question #44**

35. Results
Satisfactory

36. Results
YES

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

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

ADB 2020-02

ADB 2020-02 Low Pressure Systems

44. Notes

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.