



STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

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*Sent Via Email*

June 2, 2022

Jim Smith  
General Manager  
Klickitat Public Utilities District  
1313 S. Columbus Ave  
Goldendale, WA 98620

**RE: 2022 Biogas Gas Transmission Standard Comprehensive – Klickitat Public Utilities District – (Insp. No. 8434)**

Dear Mr. Smith:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Standard Comprehensive inspection of Klickitat Public Utilities District (KPUD) from May 9, 2022 to May 10, 2022. This inspection included a records review and inspection of pipeline facilities.

Our inspection indicates four area(s) of concern as noted in the enclosed report, which unless corrected, could potentially lead to future violation of state and/or federal pipeline safety rules.

**Your response needed**

Please review the attached report and respond in writing by July 7, 2022. The response should include how and when you plan to bring the area of concern into full compliance.

**What happens after you respond to this letter?**

The attached report presents staff's decision on the area of concern and does not constitute a finding of probable violation by the staff at this time if the issue is resolved within 45 days of discovery.

If this issue is not resolved within 45 days, this matter may result in the issuance of a notice of probable violation.

If you have any questions or if we may be of any assistance, please contact Scott Anderson at (360) 481-6978. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Respect. Professionalism. Integrity. Accountability.

Sincerely,

Sean C. Mayo  
Pipeline Safety Director

cc: Jonah Humphreys, Plant Superintendent, KPUD  
Kevin Ricks, Renewable Energy Assets Manager, KPUD  
Roy Rogers, Primary Consultant, Cathodic Protection Engineering, Inc,

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**  
**2022 Biogas Pipeline Safety Inspection**  
**Klickitat PUD**

The following areas of concern of Title 49 CFR Part 192.615(b)(2) and WAC 480-93-200(10)(a)(b) were noted as a result of the 2022 inspection of the KPUD. The inspection included a random selection of records, operation and maintenance (O&M), emergency response, inventory, and field inspection of the pipeline facilities.

**AREA OF CONCERN**

**1. 49 CFR §192.615(b)(2) Emergency Plans**

*Each operator shall train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective.*

**Finding(s):**

KPUD could not provide a record that the training had been completed. KPUD O&M manual states the training will be done annually and KPUD staff said the training had been done, but could not provide attendance sheets.

**2. 49 CFR §191.29(b) National Pipeline Mapping System**

*The information required in paragraph (a) of this section must be submitted each year, on or before March 15, representing assets as of December 31 of the previous year. If no changes have occurred since the previous year's submission, the operator must comply with the guidance provided in the NPMS Operator Standards manual available at [www.npms.phmsa.dot.gov](http://www.npms.phmsa.dot.gov) or contact the PHMSA Geographic Information Systems Manager at (202) 366-4595.*

**Finding(s):**

KPUD could not provide a record that the 2019 NPMS submission was completed. 2018, 2020, and 2021 had been submitted. Also, none of the reports were sent in by March 15,

**3. WAC 480-93-200(10)(a) Reporting Requirements**

*Each gas pipeline company must file with the commission the following annual reports no later than March 15 for the preceding calendar year: A copy of every Pipeline and Hazardous Materials Safety Administration (PHMSA) F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, Office of Pipeline Safety.*

**Finding(s):**

KPUD did not submit the 2022, CY 2021 annual report by March 15, the report was submitted on March 30, 2022. Annual reports in the previous years were submitted on time.

**4. WAC 480-93-200(10)(b) Reporting Requirements**

*Each gas pipeline company must file with the commission the following annual reports no later than March 15 for the preceding calendar year: A report detailing all*

*construction defects and material failures resulting in leakage. Each gas pipeline company must categorize the different types of construction defects and material failures anticipated for their system.*

**Finding(s):**

KPUD could not provide a record of the construction defects and material failures report for 2019. 2020-2022 were submitted on time.