



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue SE
Washington DC 20590

2021 Gas State Program Evaluation

for

MARYLAND PUBLIC SERVICE COMMISSION

Document Legend

PART:

- O -- Representative, Dates and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- State Qualifications
- D -- Program Performance
- E -- Field Inspections
- F -- Damage prevention and Annual report analysis
- G -- Interstate Agent/Agreement States



2021 Gas State Program Evaluation -- CY 2021

Gas

State Agency: Maryland

Agency Status:

Date of Visit: 04/25/2022 - 05/19/2022

Agency Representative: Mr. John Clementson
Assistant Chief Engineer

PHMSA Representative: Clint Stephens
State Liaison

Commission Chairman to whom follow up letter is to be sent:

Name/Title: Mr. Jason M. Stanek, Chairman
Agency: Maryland Public Service Commission
Address: 6 St. Paul Street, 16th Floor
City/State/Zip: Baltimore, Maryland 21201

Rating:

60105(a): Yes **60106(a):** No **Interstate Agent:** No

INSTRUCTIONS:

Complete this evaluation in accordance with the Evaluator Guidance for conducting state pipeline safety program evaluations. The evaluation should generally reflect state program performance during CY 2021 (not the status of performance at the time of the evaluation). A deficiency in any one part of a multiple-part question should be scored as "Needs Improvement." Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the appropriate notes/comments section. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and they OBJECTIVELY reflect the state's program performance for the question being evaluated. Increasing emphasis is being placed on how the state pipeline safety programs conduct and execute their pipeline safety responsibilities (their performance). This evaluation, together with selected factors reported in the state's annual progress report attachments, provide the basis for determining the state's pipeline safety grant allocation.

Scoring Summary

PARTS

A Progress Report and Program Documentation Review
B Program Inspection Procedures
C State Qualifications
D Program Performance
E Field Inspections
F Damage prevention and Annual report analysis
G Interstate Agent/Agreement States

Possible Points Points Scored

0 0
15 15
10 10
50 45
15 15
10 10
0 0

TOTALS

100 95

State Rating **95.0**

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- 1 Were the following Progress Report Items accurate? (*items not scored on progress report) Info Only Info Only
- Info Only = No Points
- a. Stats On Operators Data - Progress Report Attachment 1
 - b. State Inspection Activity Data - Progress Report Attachment 2
 - c. List of Operators Data - Progress Report Attachment 3*
 - d. Incidents/Accidents Data - Progress Report Attachment 4*
 - e. Stats of Compliance Actions Data - Progress Report Attachment 5*
 - f. List of Records Kept Data - Progress Report Attachment 6 *
 - g. Staff and TQ Training Data - Progress Report Attachment 7
 - h. Compliance with Federal Regulations Data - Progress Report Attachment 8
 - i. Performance and Damage Prevention Question Data - Progress Report Attachment 10*

Evaluator Notes:

- 1a. Data in Attachment 1 of Progress Report seems accurate.
- 1b. Data in Attachment 2 of Progress Report seems accurate.
- 1c. Data in Attachment 3 of Progress Report seems accurate.
- 1d. Data in Attachment 4 of Progress Report was verified in PDM. No issues.
- 1e. Data in Attachment 5 of Progress Report seems accurate.
- 1f. Information in Attachment 6 of Progress Report seems accurate.
- 1g. Information in Attachment 7 of Progress Report seems accurate.
- 1h. Information in Attachment 8 of Progress Report is accurate. State has automatic adoption.
- 1i. Information in Attachment 10 of Progress Report is accurate.

Total points scored for this section: 0
Total possible points for this section: 0



PART B - Program Inspection Procedures

Points(MAX) Score

- | | | | |
|---|---|---|---|
| 1 | Do written procedures address pre-inspection, inspection and post inspection activities for each of the following inspection types: Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none">a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspectionsb. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually)c. OQ Inspectionsd. Damage Prevention Inspectionse. On-Site Operator Trainingf. Construction Inspections (annual efforts)g. LNG Inspections | | |

Evaluator Notes:

Inspection procedures are contained in Part V. ? "Conducting Inspections", pages 10 ? 17; and Part VI. ? "Post Inspection Activities/Enforcement", pages 17 ? 19 of the MDPSC SOP.

- | | | | |
|---|---|---|---|
| 2 | Do written procedures address inspection priorities of each operator, and if necessary each unit, based on the following elements and time frames established in its procedures? Chapter 5.1
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| | <ul style="list-style-type: none">a. Length of time since last inspectionb. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)c. Type of activity being undertaken by operators (i.e. construction)d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.)e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors)f. Are inspection units broken down appropriately? | | |

Evaluator Notes:

Procedures are contained in Part IV. ? "Inspection Planning", section B (Inspection Priorities), pages 8 ? 9 of the MDPSC SOP.

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|---|---|---|---|
| 3 | (Compliance Procedures) Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
| | <ul style="list-style-type: none">a. Procedures to notify an operator (company officer) when a noncompliance is identifiedb. Procedures to routinely review progress of compliance actions to prevent delays or breakdownsc. Procedures regarding closing outstanding probable violations | | |

Evaluator Notes:

Procedures are contained in Part VI. ? "Post Inspection Activities/Enforcement", pages 17 ? 19 of the MDPSC SOP.

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|---|--|---|---|
| 4 | (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident?
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
| | <ul style="list-style-type: none">a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reportsb. If onsite investigation was not made, do procedures require on-call staff to obtain sufficient information to determine the facts to support the decision not to go on-site. | | |

Evaluator Notes:

Procedures are contained in Part VII. ? "Investigation of Incidents", pages 20 ? 24 of the MDPSC SOP.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues identified in Part B of the program evaluation.

Total points scored for this section: 15

Total possible points for this section: 15



PART C - State Qualifications

Points(MAX) Score

- | | | | |
|---|---|---|---|
| 1 | Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.3
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none">a. Completion of Required OQ Training before conducting inspection as leadb. Completion of Required DIMP/IMP Training before conducting inspection as leadc. Completion of Required LNG Training before conducting inspection as leadd. Root Cause Training by at least one inspector/program managere. Note any outside training completedf. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1) | | |

Evaluator Notes:

Based on training records in TQ Blackboard, the inspectors and program manager have fulfilled training requirements to lead most inspections.

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| 2 | Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations?
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|---|--|---|---|

Evaluator Notes:

The state pipeline safety program manager has adequate knowledge of PHMSA program and regulations.

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| 3 | General Comments:
Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

There were no issues identified in Part C of the program evaluation.

Total points scored for this section: 10
Total possible points for this section: 10



PART D - Program Performance**Points(MAX) Score**

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|----------|---|----------|----------|
| 1 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 3 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. Construction (did state achieve 20% of total inspection person-days?)g. OQ (see Question 3 for additional requirements)h. IMP/DIMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Standard: SHARPGAS INC DBA SHARP ENERGY (4/1/21 & 9/18/19); COLUMBIA GAS OF MARYLAND, LLC (6/29/21 & 2/4/20); UGI UTILITIES, INC (12/29/21 & 11/12/18); Peninsula Oil Propane dba Superior Plus Energy Services (6/4/21 & 11/8/19); Poores Propane (1/6/22 & 6/15/20); Baltimore Gas and Electric Co. - Transmission (10/6/21 & 2/25/20); Baltimore Gas and Electric Co. ? LNG (3/31/21 & 12/20/18); Annapolis Roads Apts. (9/1/21 & 1/9/20); Arden Pointe Apts. (5/5/21 & 10/30/19); Baltimore City H/A (1/25/21 & 3/21/19); Bradford Apts. (4/20/21 & 10/2/19); Brighton West Apts ? 5 (2/3/22 & 8/28/20); Chesapeake Glen Apts. (3/23/22 & 9/29/20); Olney Towne Houses (8/11/21 & 2/19/20); Rockland Run Condominiums (12/11/20 & 4/2/19); Yorkewood Apts. (1/29/21 & 8/1/19)

Public Awareness: SHARPGAS INC DBA SHARP ENERGY (3/25/21 & 2/15/18); COLUMBIA GAS OF MARYLAND, LLC (11/20/19); UGI UTILITIES, INC (12/29/21 & 11/15/18); Peninsula Oil Propane dba Superior Plus Energy Services (6/4/21 & 11/8/19); Poores Propane (1/6/22 & 6/15/20); Baltimore Gas and Electric Co. - Transmission (8/17/21 & 3/12/18)

Drug & Alcohol: COLUMBIA GAS OF MARYLAND, LLC (6/1/20); UGI UTILITIES, INC (12/29/21 & 11/15/18); Baltimore Gas and Electric Co. ? Transmission (4/14/22 & 11/28/18)

Construction: COLUMBIA GAS OF MARYLAND, LLC (12/23/21 & 12/16/21); UGI UTILITIES, INC (5/13/22)

OQ: SHARPGAS INC DBA SHARP ENERGY (5/18/20); COLUMBIA GAS OF MARYLAND, LLC (11/22/19); UGI UTILITIES, INC (10/31/19); Poores Propane (4/13/21 & 2/16/18); Baltimore Gas and Electric Co. (12/13/21 & 10/22/18); Annapolis Roads Apts. (5/19/20 & 10/12/16); Arden Pointe Apts. (8/17/19 & 7/13/16); Baltimore City H/A (8/15/19 & 8/4/16); Baltimore City H/A (12/12/18 & 8/4/16); Bradford Apts. (2/14/20 & 2/14/17); Brighton West Apts ? 5 (5/24/19 & 6/15/16); Chesapeake Glen Apts. (9/17/19 & 9/1/16); Olney Towne Houses (5/25/21 & 12/1/17); Rockland Run Condominiums (4/2/19 & 8/7/16); Yorkewood Apts.

DIMP: SHARPGAS INC DBA SHARP ENERGY (5/14/21 & 4/12/18); COLUMBIA GAS OF MARYLAND, LLC (7/20/21 & 11/3/17) did not meet 3 yr interval in SOP; UGI UTILITIES, INC (2/15/21 & 11/14/18) 2021 inspection not complete - did not meet 3 yr interval in SOP; Peninsula Oil Propane dba Superior Plus Energy Services (9/19/19); Poores Propane (5/19/21 & 5/2/18); Baltimore Gas and Electric Co. ? Transmission (12/27/21 & 10/10/17) did not meet 3 yr interval SOP; Annapolis Roads Apts. (6/8/20 & 10/12/16); Arden Pointe Apts. (1/2/19 & 12/3/15); Baltimore City H/A (12/12/18); Bradford Apts. ? no DIMP inspection record; Brighton West Apts ? 5 (5/24/19 & 6/15/16); Chesapeake Glen Apts. (9/25/19 & 9/1/16); Olney Towne Houses (12/17/18 & 10/19/15);

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|----------|---|-----------|----------|
| 2 | Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1. Do inspection records indicate that adequate reviews of procedures, records and field activities, including notes and the appropriate level of inspection person-days for each inspection, were performed?
Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 8 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. Constructiong. OQ (see Question 3 for additional requirements)h. IMP/DIMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Reviewed inspection reports:

Standard - SHARPGAS INC DBA SHARP ENERGY (4/1/21), COLUMBIA GAS OF MARYLAND, LLC (6/29/21), UGI UTILITIES, INC (12/29/21), Baltimore Gas and Electric Co. - Transmission (10/6/21) ? inspection form not filled out completely, Baltimore Gas and Electric Co. ? LNG (3/31/21) ? no documentation for selected N/A's, Bradford Apts. (4/20/21), Yorkewood Apts. (1/29/21) ? inspection form not filled out completely;
Public Awareness - UGI UTILITIES, INC (1/20/22); Drug & Alcohol - UGI UTILITIES, INC (1/31/22), Construction - COLUMBIA GAS OF MARYLAND, LLC (12/16/21 & 12/23/21),
OQ - Poores Propane (5/4/21), Baltimore Gas and Electric Co. (12/13/21), Olney Towne Houses (6/1/21);
DIMP - SHARPGAS INC DBA SHARP ENERGY (4/1/21), COLUMBIA GAS OF MARYLAND, LLC (7/23/21), Poores Propane (7/31/21), Baltimore Gas and Electric Co. ? Transmission (01/26/22) - no documentation for selected N/A's.

Note: MDPSC needs to consider utilizing the end date of an inspection by which to start its inspection intervals.

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| 3 | Is state verifying monitoring (Protocol 9/Form15) of operators OQ programs? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals established in the operator's plan. 49 CFR 192 Part N
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Reviewed inspection reports: OQ - Poores Propane (5/4/21), Baltimore Gas and Electric Co. (12/13/21), Olney Towne Houses (6/1/21). The state is verifying operators OQ programs, such as plan updates and confirming persons performing covered tasks are properly qualified and requalified at intervals established in the operator's plan.

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| 4 | Is state verifying operator's integrity management Programs (IMP and DIMP)? This should include a review of plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operator's plan(s). 49 CFR 192 Subparts O and P
Yes = 2 No = 0 Needs Improvement = 1
a. Are the implementation plans of the state's large/largest operators(s) being reviewed annually to ensure they are completing full cycle of the IMP process?
b. Are states verifying with operators any plastic pipe and components that have shown a record of defects/leaks and mitigating those through DIMP plan?
c. Are the states verifying operators are including low pressure distribution systems in their threat analysis? | 2 | 1 |
|---|---|---|---|

Evaluator Notes:

Reviewed inspection reports: DIMP - SHARPGAS INC DBA SHARP ENERGY (4/1/21), COLUMBIA GAS OF MARYLAND, LLC (7/23/21), Poores Propane (7/31/21), Baltimore Gas and Electric Co. ? Transmission (01/26/22), and Bradford Apts. ? no DIMP inspection record.

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| 5 | Did the state review the following (these items are NTSB recommendations to PHMSA that have been deemed acceptable response based on PHMSA reviewing these items during the evaluation process): Chapter 5.1
Yes = 2 No = 0 Needs Improvement = 1
a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken;
b. Operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance);
c. Operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21;
d. Operator records of previous accidents and failures including reported third-party damage and leak response to ensure appropriate operator response as required by 192.617; | 2 | 2 |
|---|--|---|---|

- e. Directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies;
- f. Operator procedures for considering low pressure distribution systems in threat analysis?
- g. Operator compliance with state and federal regulations for regulators located inside buildings?

Evaluator Notes:

The state has included the NTSB recommendations in the records inspection of all operators following 5/17/21.

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|---|---|---|---|
| 6 | Did the State verify Operators took appropriate action regarding advisory bulletins issued since the last evaluation? (Advisory Bulletins Current Year) | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

Evaluator Notes:

The state has included the ADB's in the records inspection of all operators following 5/17/21.

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|---|--|----|----|
| 7 | (Compliance Activities) Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1 | 10 | 10 |
| | Yes = 10 No = 0 Needs Improvement = 1-9 | | |
| | <ul style="list-style-type: none"> a. Were compliance actions sent to company officer or manager/board member if municipal/government system? b. Were probable violations documented properly? c. Resolve probable violations d. Routinely review progress of probable violations e. Did state issue compliance actions for all probable violations discovered? f. Can state demonstrate fining authority for pipeline safety violations? g. Does Program Manager review, approve and monitor all compliance actions? (note: Program Manager or Senior Official should sign any NOPV or related enforcement action) h. Did state compliance actions give reasonable due process to all parties? Including "show cause" hearing, if necessary. i. Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns j. Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. (Incident investigations do not need to meet 30/90-day requirement) | | |

Evaluator Notes:

The state did not have any probable violations recorded from the random list of operators in CY 2021.

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|---|--|----|----|
| 8 | (Incident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations? | 10 | 10 |
| | Yes = 10 No = 0 Needs Improvement = 1-9 | | |
| | <ul style="list-style-type: none"> a. Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? b. Did state keep adequate records of Incident/Accident notifications received? c. If onsite investigation was not made, did the state obtain sufficient information from the operator and/or by means to determine the facts to support the decision not to go on site? d. Were onsite observations documented? e. Were contributing factors documented? f. Were recommendations to prevent recurrences, where appropriate, documented? g. Did state initiate compliance action for any violations found during any incident/accident investigation? h. Did state assist Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? | | |

- i. Does state share any lessons learned from incidents/accidents?

Evaluator Notes:

Reviewed incident reports: WGL (4/14/21) ? State did not make recommendation to prevent recurrence, BG&E (5/14/21) ? operator was sent a NOPV which a response is not due, WGL (5/25/21) - operator was sent a NOPV and accepted responsibility, WGL (11/3/21) ? the state made recommendation to prevent recurrence, WGL (12/16/21) ? no issue. The federally reportable incidents were investigated, thoroughly documented, with conclusions and recommendations. No issues.

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|----------|---|---|---|
| 9 | Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Chair letter sent 8/12/21, response received 9/22/21. No issues.

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|-----------|---|-----------|-----------|
| 10 | Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

Last pipeline seminar was held in CY 2019. Scheduled for November 9-10, 2022.

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| 11 | Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission?
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

This question has been added to all records inspections as of 5/17/21.

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| 12 | Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public).
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

The state meets four times a year Gas Operators Advisory Committee (GOACT) meeting in which discussion entails new regulations, damage prevention, new ADB's, etc. The PSC has webpage that shows pipeline safety office description, forms, and gas and liquid operators.

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| 13 | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.7
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

State has no open SRC reports.

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|-----------|---|---|---|
| 14 | Was the State responsive to:
Yes = 1 No = 0 Needs Improvement = .5
a. Surveys or information requests from NAPS or PHMSA; and
b. PHMSA Work Management system tasks? | 1 | 1 |
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Evaluator Notes:

State completes monkey surveys for PHMSA and/or NAPS. MDPSC has responded to WMS tasks.

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| 15 | If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate.
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

MDPSC has no waivers/special permits.

16 Were pipeline program files well-organized and accessible?

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Yes. Pipeline files were well-organized and accessible through the pipeline EN database.

17 Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT). Has the state updated SICT data?

3

3

Yes = 3 No = 0 Needs Improvement = 1-2

Evaluator Notes:

CY 2021 SICT calculation (Gas 396); Attachment 2 (Gas 604). Data was updated in CY 2021. No issues.

18 Discussion on State Program Performance Metrics found on Stakeholder Communication site.\ <http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805>

Info Only = No Points

Evaluator Notes:

Discussed with state Leak Management performance metrics ? From 2019 to 2021 a decrease in gas distribution total leaks eliminated/repairs repaired per 1,000 miles; from 2020 to 2021 an increase in hazardous leaks eliminated/repaired per 1,000 miles; and from 2019 to 2021 a decrease in leaks scheduled for repair at end of year per 1,000 miles. No issues.

19 Did the state encourage and promote operator implementation of Pipeline Safety Management Systems (PSMS), or API RP 1173? This holistic approach to improving pipeline safety includes the identification, prevention and remediation of safety hazards.

Info Only Info Only

Info Only = No Points

a. <https://pipelinesms.org/>

b. Reference AGA recommendation to members May 20, 2019

Evaluator Notes:

The state did discuss with operators during the GOACT meeting PSMS and their plans to implement a program soon. The larger operators in the state are utilizing PSMS in their safety programs.

20 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The following issues were identified in Part D of the program evaluation:

(1) The State did inspect all types of operators and inspection units in accordance with time intervals established in written procedures; (2) the State did not complete all applicable portions of inspection forms; and (3) the state is not verifying all operator's integrity management Programs (IMP and DIMP).

Total points scored for this section: 45
Total possible points for this section: 50

PART E - Field Inspections

Points(MAX) Score

- 1 Operator, Inspector, Location, Date and PHMSA Representative (enter specifics into the comments box below) Info Only Info Only

Info Only = No Points

- What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc)
- When was the unit inspected last?
- Was pipeline operator or representative present during inspection?
- Effort should be made to observe newest state inspector with least experience

Evaluator Notes:

Operators: Columbia Gas of Maryland and Washington Gas

Inspectors: Carlos Acosta (L), R.K Amroliwala (L), and Barbara Weber

Locations: Hagerstown, MD and Upper Malboro, MD

Dates: April 27, 2022 and April 28, 2022

PHMSA Rep: Clint Stephens

On 4/27/22, the inspectors performed a regulator station inspection. On 4/28/22, the inspectors performed a construction inspection. The pipeline operator representative was present during the inspection.

- 2 Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) 2 2
- Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

The inspectors used a regulator station inspection report checklist and a plastic pipeline construction inspection checklist. The checklist was used as a guide for the inspection.

- 3 Did the inspector adequately review the following during the inspection 10 10
- Yes = 10 No = 0 Needs Improvement = 1-9
- Procedures (were the inspector's questions of the operator adequate to determine compliance?)
 - Records (did the inspector adequately review trends and ask in-depth questions?)
 - Field Activities/Facilities (did inspector ensure that procedures were being followed, including ensuring that properly calibrated equipment was used and OQ's were acceptable?)
 - Other (please comment)
 - Was the inspection of adequate length to properly perform the inspection?

Evaluator Notes:

During the regulator station inspection the inspector observed the testing of critical valve; checking inlet/outlet operating pressures; over pressure protection set points; test equipment calibration records; and company personnel OQ records. During the construction inspection the inspector observed plastic pipe butt/electrofusion process and procedures, and personnel OQ records. The inspection was not complete at the time of the field evaluation.

- 4 From your observation did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) 2 2
- Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

From my observation the inspector had adequate knowledge of the pipeline safety program and regulations.

- 5 Did the inspector conduct an exit interview, including identifying probable violations? (If inspection is not totally completed the interview should be based on areas covered during time of field evaluation) 1 1
- Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The inspections were not complete at the time of the evaluation, however the inspector did communicate with the operator any issues identified the day of the inspection.

-
- 6** Was inspection performed in a safe, positive, and constructive manner ? Info Only Info Only
Info Only = No Points
- a. No unsafe acts should be performed during inspection by the state inspector
 - b. What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)
 - c. Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)
 - d. Other

Evaluator Notes:

The inspectors worked in safe manner during the inspection. The inspectors observed the testing of critical valve; checking inlet/outlet operating pressures; over pressure protection set points; test equipment calibration records; and company personnel OQ records. During the construction inspection the inspector observed plastic pipe butt/electrofusion process and procedures, and personnel OQ records. The inspection was not complete at the time of the field evaluation.

- 7** General Comments: Info Only Info Only
Info Only = No Points

Evaluator Notes:

There were no issues identified in Part E of the program evaluation.

Total points scored for this section: 15
Total possible points for this section: 15



PART F - Damage prevention and Annual report analysis**Points(MAX) Score**

- | | | | |
|---|--|---|---|
| 1 | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues.
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

The state has reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issued. The state showed a spreadsheet with data taken from the annual reports with root causes identified for pipeline damages.

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- | | | | |
|---|--|---|---|
| 2 | Has the state verified that the operators analyze excavation damages for the purpose of determining root causes and minimizing the possibility of a recurrence? (192.617)
Has the state verified that the operators have appropriately identified excavators who have repeatedly violated one-call laws and damaged their facilities. Have the operators taken steps to mitigate that risks? (192.1007)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Based on an incident for Washington Gas Light CO. it was determined the contractor struck a 22" transmission line due to operator mismarking the pipeline. It was recommended that the operator pull the locator for retraining. The operator was assessed a civil penalty. Recommend the state should discuss with operator excavators who have repeatedly violated one-call laws and damaged their facilities. This discussion should be documented by the state.

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- | | | | |
|---|---|---|---|
| 3 | Has the state reviewed the operator's annual report pertaining to Part D - Excavation Damage?
Yes = 4 No = 0 Needs Improvement = 1-3 <ol style="list-style-type: none">a. Is the information complete and accurate with root cause numbers?b. Has the state evaluated the causes for the damages listed under "One-Call Notification Practices Not Sufficient" (Part D.1.a.)?c. Has the state evaluated the causes for the damages listed under "Locating Practices Not Sufficient" (Part D.1.b)? For each operator, does the state review the following?d. Is the operator or its locating contractor(s) qualified and following written procedures for locating and marking facilities?e. Is the operator appropriately requalifying locators to address performance deficiencies?f. What is the number of damages resulting from mismarks?g. What is the number of damages resulting from not locating within time requirements (no-shows)?h. Is the operator appropriately addressing discovered mapping errors resulting in excavation damages?i. Are mapping corrections timely and according to written procedures?j. Has the state evaluated the causes for the damages listed under "Excavation Practices Not Sufficient" (Part D.1.c.)? | 4 | 4 |
|---|---|---|---|

Evaluator Notes:

The state has reviewed Operator Annual reports pertaining to Part D and analyzed data for trends and operator issued. The state showed a spreadsheet with data taken from the annual reports with root causes identified for pipeline damages.

-
- | | | | |
|---|---|---|---|
| 4 | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests?
Yes = 2 No = 0 Needs Improvement = 1 <ol style="list-style-type: none">a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages? | 2 | 2 |
|---|---|---|---|

- c. Has the state evaluated which of the following best describes the reason for the excavation damages; i.e., operator or contractor not following written procedures, failure to maintain marks, failure to support exposed facilities, failure to use hand tools were required, failure to test-hole (pot hole), improper backfilling practices, failure to maintain clearance or insufficient excavation practices.
- d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?

Evaluator Notes:

The state has collected data and evaluated trends on the number of pipeline damages per 1,000 locate tickets. It has been determined from analysis of the data that third party damage is causing the highest number of damages to the pipeline. The Maryland Underground Facilities Damage Prevention Authority offers training once a month to the excavators on reviewing Damage Prevention law. This training is also offered in Spanish. The state has evaluated the reasons for the excavation damages?included in spreadsheet with operator annual report data.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues identified in Part F of the program evaluation.

Total points scored for this section: 10
Total possible points for this section: 10



PART G - Interstate Agent/Agreement States

Points(MAX) Score

- 1 Were all inspections of interstate pipelines conducted using the Inspection Assistant program for documenting inspections? Info Only Info Only
Info Only = No Points

Evaluator Notes:

Maryland PSC is not an interstate agent.

- 2 If inspections were conducted independent of a PHMSA team inspection was notice of all identified probable violations provided to PHMSA within 60 days? Info Only Info Only
Info Only = No Points

Evaluator Notes:

Maryland PSC is not an interstate agent.

- 3 If inspections were conducted independent of a PHMSA team inspection was PHMSA immediately notified of conditions which may pose an immediate safety hazard to the public or environment? Info Only Info Only
Info Only = No Points

Evaluator Notes:

Maryland PSC is not an interstate agent.

- 4 If inspections were conducted independent of a PHMSA team inspection did the state coordinate with PHMSA if inspections not were not included in the PHMSA Inspection Work Plan? Info Only Info Only
Info Only = No Points

Evaluator Notes:

Maryland PSC is not an interstate agent.

- 5 Did the state take direction from and cooperate with PHMSA for all incident investigations conducted on interstate pipelines? Info Only Info Only
Info Only = No Points

Evaluator Notes:

Maryland PSC is not an interstate agent.

- 6 General Comments: Info Only Info Only
Info Only = No Points

Evaluator Notes:

Maryland PSC is not an interstate agent.

Total points scored for this section: 0
Total possible points for this section: 0