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

1200 New Jersey Avenue SE
Washington DC 20590

2022 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

2022 Gas State Program Evaluation -- CY 2022

Gas

State Agency: Maryland
Rating:
Agency Status:
60105(a): Yes **60106(a):** No **Interstate Agent:** No
Date of Visit: 07/10/2023 - 07/14/2023
Agency Representative: Mr. John Clementson Assistant Chief Engineer
PHMSA Representative: Michael Thompson, 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

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 2022 (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		Possible Points	Points Scored
A	Progress Report and Program Documentation Review	0	0
B	Program Inspection Procedures	15	15
C	State Qualifications	10	10
D	Program Performance	50	48
E	Field Inspections	15	15
F	Damage prevention and Annual report analysis	10	10
G	Interstate Agent/Agreement States	0	0
TOTALS		**100**	**98**
State Rating			**98.0**

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 = 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*	Info Only	Info Only

Evaluator Notes:
Reviewed data and information and found no issues.

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 a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspections b. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually) c. OQ Inspections d. Damage Prevention Inspections e. On-Site Operator Training f. Construction Inspections (annual efforts) g. LNG Inspections	5	5

Evaluator Notes:
The Maryland PSC procedures cover all types of inspections in Section IV, V and VI of their manual. The procedures cover Inspection planning, pre-inspection, conducting inspections and post inspection activities/enforcement.

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 a. Length of time since last inspection b. 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?	4	4

Evaluator Notes:
The Maryland PSC procedures cover inspection priorities in Section IV of their manual. The procedures cover.
1. Inspector Input/knowledge obtained from prior inspections.
2. Prior compliance performance of operators
? Both the number and severity of prior non-compliances
? Number, nature, and age of outstanding compliance issues that remain open
3. Data from annual reports1 or other sources indicative of inherent pipeline system risk such as:
a) Prior incident history
b) Prior leak history
c) Mileage and HCA mileage
d) Pipe diameter
e) Age of pipe
f) Coating and Cathodic Protection
g) Type of pipe (especially vintage pipe of problematic design such as LF-ERW pipe, cast iron pipe, etc.)
4. Time since previous inspection
5. Number, nature, and age of outstanding compliance issues that remain open
6. Pipeline system expansion (e.g., new construction, acquisitions, etc.)

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 a. Procedures to notify an operator (company officer) when a noncompliance is identified b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns	3	3

c. Procedures regarding closing outstanding probable violations

Evaluator Notes:

The Maryland PSC procedures cover notification of an operator when a noncompliance is found in Section VI of their manual. Procedures for tracking probable violations and closing out PVs is in Section VI, C and D.

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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? 3 3

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

a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports

b. 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:

The Maryland PSC procedures cover Investigation of Incidents in Section VII of their manual.

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5 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

NONE

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 a. Completion of Required OQ Training before conducting inspection as lead b. Completion of Required DIMP/IMP Training before conducting inspection as lead c. Completion of Required LNG Training before conducting inspection as lead d. Root Cause Training by at least one inspector/program manager e. Note any outside training completed f. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1)	5	5

Evaluator Notes:
Reviewed the training records on TQ's Blackboard and found that almost all of the inspectors have completed the training to lead most types of inspections. The program manager has completed tthe required training.

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 program manager demonstrated adequate knowledge of the pipeline safety program and regulations.

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

Evaluator Notes:
NONE

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

PART D - Program Performance

		Points(MAX)	Score
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 a. Standard (General Code Compliance) b. Public Awareness Effectiveness Reviews c. Drug and Alcohol d. Control Room Management e. Part 193 LNG Inspections f. 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)	5	5

Evaluator Notes:
Reviewed inspections for all operators on Random Operators list and found no issues.

		Points(MAX)	Score
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 a. Standard (General Code Compliance) b. Public Awareness Effectiveness Reviews c. Drug and Alcohol d. Control Room Management e. Part 193 LNG Inspections f. Construction g. OQ (see Question 3 for additional requirements) h. IMP/DIMP (see Question 4 for additional requirements)	10	10

Evaluator Notes:
Reviewed all inspection reports and forms for each type of inspection for all operators on the Random Operator List. All applicable portions of the form were filled out and showed an adequate review of procedures, records and field activities.

		Points(MAX)	Score
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:
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.

		Points(MAX)	Score
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:

A. The state is not annually reviewing the implementation plans for their largest operators on an annual basis.
B. Yes
C. Yes

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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 — 2 — 2

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;
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.

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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

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:
Reviewed compliance activities generated from the inspections reviewed on the Random Operators List as well as any started in 2022 and found the process to be satisfactory.

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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

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:
The state had two incidents during 2022. Reviewed and found 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 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
Yes, the letter went out to the state on 6/1/2022 and the state responded on 7/29/2022

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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 Info Only
Info Only = No Points

Evaluator Notes:
Yes, the state held a seminar on 11/9-10/2022. TQ had a represe4ntative there and presented information.

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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 Info Only
Info Only = No Points

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). 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
Yes, the state meets with its largest operators four times per year as an advisory committee. They continue to improve their public web site.

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

Evaluator Notes:

The state had NO SRCs in 2022

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14 Was the State responsive to: 1 1

Yes = 1 No = 0 Needs Improvement = .5

a. Surveys or information requests from NAPSR or PHMSA; and

b. PHMSA Work Management system tasks?

Evaluator Notes:

Yes, the state did respond to NAPSR surveys and complete PHMSA WMS assignments.

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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. 1 0

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The state has two active waivers at this time,

1. Washington Natural Gas - 2/1997
2. Columbia Gas - 7/1997

Neither of the waivers have been reviewed or verified to insure the conditions of them have been met.

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16 Were pipeline program files well-organized and accessible? Info Only Info Only

Info Only = No Points

Evaluator Notes:

Yes, the program files were well organized and accessible.

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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:

Yes, Discussed the accuracy of the SICT numbers with the state.

Gas SICT for 2022 was 364 day7s. The state completed and reported 674 Days on their progress report with 299 being construction inspections.

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

Info Only = No Points

Evaluator Notes:

Maryland

State Program Metrics: 2022

Damage Prevention: The numbers have increased from 2021 at 0.8 to 0.9 in 2022. What's up and what are you going to do to fix it?

Inspection days per 1000 mile of gas pipe: The number of days has increase from 13.86 in 2020 to 11.67 in 2021.

Inspection Days per MMO/LPG Unit: The number of days has moved up from 1.25 in 2020 to 1.50 in 2021.

Inspection days per 1000 mile of HL pipe: Since 2018 the inspection days for HL pipelines has gone up from 4.83 days to 8.7 days in 2020.

Inspector Qualifications: The Gas pipeline inspector qualifications have increased in all categories from 2020 to 2021. The HL pipeline inspector qualifications are only fully scored in 2021. No idea what happened to the numbers for additional training and 5-year retention in 2019 and 2020.

Gas Distribution system leaks: Leak repairs per 100 miles of pipe have had a steady downward trend from 2019 to 2022.

Gas pipeline enforcement program evaluation:
An increase in the score from 92 in 2019 to 100 in 2020. The score for the HL program has been a steady 100 from 2014 to 2020.

Incident evaluation Program: Numbers have been at 100% for both programs since 2014 to 2020.

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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 = No Points — Info Only | Info Only

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.

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20 General Comments: Info Only = No Points — Info Only | Info Only

Evaluator Notes:
D4A - A. The state is not annually reviewing the implementation plans for their largest operators on an annual basis. A loss of 1 point.
D15. The state has two active waivers at this time,
1. Washington Natural Gas - 2/1997
2. Columbia Gas - 7/1997
Neither of the waivers have been reviewed or verified to insure the conditions of them have been met. A loss of 1 point

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Total points scored for this section: 48
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 = No Points a. What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc) b. When was the unit inspected last? c. Was pipeline operator or representative present during inspection? d. Effort should be made to observe newest state inspector with least experience	Info Only	Info Only

Evaluator Notes:
Inspected Baltimore Gas and Electric
A. Construction
B. On going
C. Yes, pipeline operator was present.
D. Observed Kobby Anyinam

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) Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:
Yes, the inspector used their construction inspection form as a guide.

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

Evaluator Notes:
A. Yes, the inspectors questions concerning procedures were adequate.
B. NA
C. The inspector observed trenching, pot holing, boring and plastic pipe installation.
D. NONE
E. The inspection was of appropriate length.

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

Evaluator Notes:
Yes, the inspector the inspector did have 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) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:
Yes, the inspector went over what was observed during the inspection, with no issues being identified.

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:

A. No unsafe acts were observed during the inspection.

B. The inspector observed trenching, pot holing, boring and plastic pipe installation.

C. None at this time.

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7 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

NONE

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's Annual Reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues. The state showed a spreadsheet with data taken from the annual reports with root causes identified for pipeline damages.

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:
On an annual basis the state requests root cause data from the Operators with the purpose of analyzing the data to determine trends on a yearly basis. Tha analyzed data is used to formalize discussions with the Operators to discuss the Operator's plans for reducing their excavation damages. As part of the annual request for data, the state also asks for the names of excavators that are the worst offenders with regard to excavation damage.

3	Has the state reviewed the operator's annual report pertaining to Part D - Excavation Damage? Yes = 4 No = 0 Needs Improvement = 1-3 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's Annual Reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues. 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 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 and evaluated trends on the number of pipeline damages per 1,000 locate tickets. It has been determined from an analysis of the data that "Locating Practices not Sufficient" (39%) was the leading cause for excavation damage in Maryland for the Operators. The Maryland Underground Facilities Damage Prevention Authority offers training once a month to the excavation community on the current Damage Prevention law. The training is also offered in Spanish. The state has evaluated the reasons for the excavation damages using a spreadsheet with operator reported data.

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5 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

NONE

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 = No Points	Info Only	Info Only

Evaluator Notes:
MD PSC is not an interstate agent and does not have a 60106 agreement with PHMSA.

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 = No Points	Info Only	Info Only

Evaluator Notes:
MD PSC is not an interstate agent and does not have a 60106 agreement with PHMSA.

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 = No Points	Info Only	Info Only

Evaluator Notes:
MD PSC is not an interstate agent and does not have a 60106 agreement with PHMSA.

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 = No Points	Info Only	Info Only

Evaluator Notes:
MD PSC is not an interstate agent and does not have a 60106 agreement with PHMSA.

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

Evaluator Notes:
MD PSC is not an interstate agent and does not have a 60106 agreement with PHMSA.

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

Evaluator Notes:

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