



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

VIRGINIA STATE CORPORATION 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: Virginia

Agency Status:

Date of Visit: 09/12/2023 - 10/25/2023

Agency Representative: Mr. Scott Marshall
Program Manager

PHMSA Representative: Clint Stephens
State Liaison

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

Name/Title: Mr. Jehmel T. Hudson, Chairman

Agency: Virginia State Corporation Commission

Address: 1300 East Main Street

City/State/Zip: Richmond, Virginia 23219

Rating:

60105(a): Yes **60106(a):** Yes **Interstate Agent:** Yes

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
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

0
15
10
50
15
10
0

0
15
10
50
15
10
0

TOTALS

100 100

State Rating

100.0

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:

- a. Attachment 1 ? gathering line operators should be 6; municipal units do not correlate with Attachment 3; intrastate transmission units should be (15) do not correlate with Attachment 3; number of LPG operators should be (11).
- b. Attachment 2 ? could not show me the numbers for CY 2022.
- c. Attachment 3 ? need to check numbers listed in Attachment 1.
- d. Attachment 4 ? no issues.
- e. Attachment 5 ? no issues.
- f. Attachment 6 ? no issues.
- g. Attachment 7 ? no issues.
- h. Attachment 8 ? automatic adoption of federal rules.
- i. Attachment 10 ? no issues.

*All accuracy corrections were sent to Carrie and corrected before the end of the program evaluation.

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



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|---|---|---|---|
| 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 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 | | |

Evaluator Notes:

There were no changes from last year. Section 5, of the State Program Procedures, page 20-35, describes all pre-inspection, inspection and post inspection guidelines.

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| 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 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? | | |

Evaluator Notes:

There were no changes from last year. The VA SCC utilizes a risk model which contemplates numerous operator data points, including but not limited to miles of pipe by facility type, material, numbers of services, performance factors including leak rates, outside force, earth movement, critical infrastructure etc. For a full list the risk model and its logic are described in detail Section 5.A "Annual Risk-Based Inspection Schedule" on Page 25-28 of the State's program procedures.

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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 identified b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns c. Procedures regarding closing outstanding probable violations | | |

Evaluator Notes:

State Program Procedures, Section 5.B.5 "Post-Inspection Actives" Pgs. 36, the Division has exception, weekly, and monthly SQL Db canned reports showing open inspections, open investigations, NOI compliance, etc. to assist in the management team tracking the progress of inspection/investigation work production.
Appendix No. 5 of the State Program Procedures details. Enforcement utilizes SharePoint to track when Investigations and finalized and approved by the PM to OGC to process for enforcement.
Additionally, the canned reports show if a Notice of Investigation has been generated within the timeframe for compliance with the 2016 PIPES Act. The state program enforcement procedures are listed in the Program Procedures Appendix No. 6.

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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 |
|---|--|---|---|

- 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:

Section Q- Discusses State Program On-Call Process, Pg. 67. Appendix No. 7, Section VI (E). "DOT-NTSB Memorandum of Understanding ("MOU")", Pg. 105. Appendix No 7, Section VI (A) to (D) details the cooperative investigating efforts, Pg. 103. Section 7, VII, SCC Response to Incidents and Accidents, details follow up actions necessary to obtain additional information if a response is not necessary or unable (manpower) to occur. Pg. 109.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

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

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



PART C - State Qualifications

Points(MAX) Score

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|---|---|---|---|
| 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:

Yes. Each inspector and program manager has fulfilled training requirements. David Bishop and Evan Lewis are new employee as of 2023. James Fisher has not completed DIMP course but does not lead these types of 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 |
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Evaluator Notes:

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

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| 3 | General Comments:
Info Only = No Points | Info Only | Info Only |
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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 | 5 |
| | <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:

Reviewed the following inspection intervals:

Standard: Roanoke Gas Co. (2020), Appalachian Natural Gas (2019), City of Danville (2019), Washington Gas Light Co. (2020), Virginia Natural Gas (2022 & 2019), Columbia Gas of Virginia Inc. (2021), Southwestern Virginia Gas Co. (2022 & 2019), Virginia Natural Gas (2021), Atmos Energy (2022 & 2021), CNX Resources Corp. (2020), Roanoke Gas Co. (LNG ? 2021), Akelius Real Estate Management LLC (discovered 2021), Amurcon Realty Company (2021), Beacon Property Management LLC (2021)

PA: Roanoke Gas Co. (2021), Roanoke Gas Co. (2022 & 2019), City of Danville (2021), Washington Gas Light Co. (2021), Virginia Natural Gas (2021), Columbia Gas of Virginia Inc. (2021), Southwestern Virginia Gas Co. (2022 & 2018), Virginia Natural Gas (2021), Atmos Energy (2022 & 2018), CNX Resources Corp. (2021), Roanoke Gas Co. (LNG ? 2021),

D&A: Roanoke Gas Co. (2021), Appalachian Natural Gas (2022 & 2018), City of Danville (2021), Washington Gas Light Co. (2021), Virginia Natural Gas (2021), Columbia Gas of Virginia Inc. (2021), Southwestern Virginia Gas Co. (2019), Virginia Natural Gas (2021), Atmos Energy (2022 & 2018), CNX Resources Corp. (2021)), Roanoke Gas Co. (LNG ? 2021),

CRM: Virginia Natural Gas (2021), Atmos Energy (2023 & 2018)

OQ: Roanoke Gas Co. (2018), Appalachian Natural Gas (2019), City of Danville (2022 & 2019), Washington Gas Light Co. (2020), Virginia Natural Gas (2019), Columbia Gas of Virginia Inc. (2022-open & 2019), Southwestern Virginia Gas Co. (2022 & 2019), Atmos Energy (2023 & 2018), CNX Resources Corp. (2022 & 2019), Roanoke Gas Co. (LNG ? 2018)

IMP/DIMP: Roanoke Gas Co. (2020), Appalachian Natural Gas (2020), Washington Gas Light Co. (2020), Virginia Natural Gas (2020), Columbia Gas of Virginia Inc. (2020), Southwestern Virginia Gas Co. (2020), Virginia Natural Gas (2021), Atmos Energy (2021)

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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 | 10 |
| | <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:

The VA SCC is using the IA equivalent forms. All applicable portions of inspection forms were completed in their entirety.

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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 |
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Evaluator Notes:

The VA SCC performed OQ HQ inspections as detailed in the 10-year plan. Protocol 9 field inspections during random field inspections to verify knowledge, skills, and abilities of covered employees in accordance with Section F of Pipeline Program Procedures. Completed Form 15s are loaded as PIPES exhibits.

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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 <ul style="list-style-type: none">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 | 2 |
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Evaluator Notes:

The VA SCC performed GT and HL IM program inspections in accordance with Section I of the program's procedures and 10-year plans.

The Program Manager requests annually information from each transmission operator. Amongst other things this request is for all planned IMP activities, ILI launches, integrity digs, direct examinations, planned replacements, and/or repairs. Projected work is tracked by the Program Manager in the shared TIMP@scc.virginia.gov calendar and scheduled to be inspected by qualified Staff.

The Program Manager requests the largest IM applicable operators to provide records and presentations on the IM programs, goals, accomplishments annually per program procedures.

As staff becomes aware of IM activities, conditions, or examinations these are added on an ad hoc basis.

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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 <ul style="list-style-type: none">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? | 2 | 2 |
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Evaluator Notes:

Yes. VA SCC needs to add (g) to their supplemental inspection form. This was completed before the end of the program evaluation.

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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)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

The VA SCC communicates applicable ADBs to each operator during standard inspections per Section 5 of the pipeline safety procedures. ADBs are listed in IA considerations. In addition, when new ADBs are issued they are shared through URS Safety Alert Emails to staff and operators.

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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
Yes = 10 No = 0 Needs Improvement = 1-9 <ol 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 violationsd. Routinely review progress of probable violationse. 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 concernsj. 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) | 10 | 10 |
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Evaluator Notes:

Reviewed 2022 Washington Gas Light Co. and AP Preston Trails inspections. The state did follow compliance procedures from discovery to resolution and adequately document all probable violations.

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| 8 | (Incident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations?
Yes = 10 No = 0 Needs Improvement = 1-9 <ol 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? | 10 | 10 |
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Evaluator Notes:

Reviewed investigation report for Virginia Natural Gas. The incident was investigated thoroughly, documented with

conclusions and recommendation. The investigation was closed on 11/21/22, and enforcement action was sent out on 10/25/23.

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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:

There was no response required from last year's program evaluation.

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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:

The Program conducted a virtual pipeline safety training session on October 21, 2021, due to the COVID-19 pandemic. It was attended by 160 operator representatives, PHMSA, and other stakeholders. Topics included the NTSB report on the Silver Spring, Maryland explosion, PHMSA and State responses, a presentation from the Virginia State Police Fusion center on eco-terrorism targeting pipelines, cyber security, and the anti-pipeline movement, the new Gas Implementation Rule, and other topics.

The Program conducted a NAPSR ER Meeting and Training Session on August 14-18, 2023. The meeting was attended by pipeline operators, contractors, PHMSA, NAPSR, AGA, CISA, and TSA. topics included new regulations, recent incidents, inspections, and more.

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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:

VA SCC reviews NPMS Data of all operators during standard inspections and review of annual reports for mileage changes. In addition, they utilize NPMS data during accident and incident response in coordination with PHMSA AID. There has not been any inconsistencies or major changes to NPMS since the addition of the VNG Southside Connector Project on June 6, 2019.

VA SCC did discover a segment of non-reported interstate pipeline operated by TransCanada providing service to the intrastate power generation facility which operates a short segment of intrastate metering and regulation. This was reported to PHMSA ER who worked with TransCanada to correct.

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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 communicates with stakeholders through its Division Pipeline Safety Newsletter, URS Safety Alerts via e-mail alerts, Operator e-mail news list, state website, executive meetings, operator trainings upon request, and SCC/LDC meeting.

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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:

There were no open SRC Reports at this time.

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

The Program Manager responds to all NAPSR and PHMSA surveys and information requests from PHMSA. Reviewed some email responses during the program evaluation. State was responsive to WMS tasks. No issues.

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

Evaluator Notes:

The State has not issued any waiver/special permits since 1999 with Virginia Natural Gas.

- 16** Were pipeline program files well-organized and accessible? Info Only Info Only
Info Only = No Points

Evaluator Notes:

Yes. Program files were well organized and accessible.

- 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:

Discussed with the VA SCC the accuracy of inspection day information submitted into SICT. The state program has updated the SICT tool prior to the requested due date. The SCIT submittal verifies the State Program has ample staffing to cover the standard inspection needs of its operators.

- 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:

Discussed the following performance metric with the VA SCC:

? Damage Prevention Program ? Gas distribution excavation damages per 1,000 tickets have increased from 2020 ? 2022.

? Leak Management ? Leaks eliminated/repaired per 1,000 miles has decreased from 2021 to 2022; and hazardous leaks eliminated/repaired per 1,000 miles

These trends have been evaluated by the state and found to be areas of improvement from previous data analysis.

- 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:

In 20216 the state placed Operators under Order to require PSMS, including the assessment of PSMS Gap Analysis.

VA SCC staff performed inspections of these PSMS programs in 2017 and 2019. A next round of reviews is tentatively planned in 2024.

VA SCC staff track the PSMS implications of non-compliances during investigations, including toleration of System resources, compliancy, normalization of deviance, and other SMS factors.

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

Evaluator Notes:

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

Total points scored for this section: 50
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 Info Only Info Only comments box below)

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:

a. Construction inspection with Washington Gas Light Company (WGL) at 18000 Marsh Pine Road in Dumfries, VA on September 14, 2023. Work was performed by NPL Construction Contractor. PHMSA representative: Glynn Blanton. VA SCC Representative: David Bishop

b. This is an ongoing construction inspection of service lines being installed in the Dumfries area.

c. Yes, NPL construction crews were present.

Chris Garnett - Operator Representative, Jose Requeno - Operator Representative, Justin Rose - Operator Representative, Marvin Mejia-Santos - Operator Representative & Richard Baylor - Operator Representative.

d. David Bishop has recently completed all TQ courses to meet the Gas Inspector qualifications. He has not been observed before pertaining to the State Program evaluation field review.

- 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:

Yes, it was observed David Bishop was using the VASCC inspection form and recording information about the construction in his field book. Detailed information on the crew members OQ and plastic fusion certifications were recorded. The inspection was thorough and performed in a safe manner.

- 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:

a. Yes, David Bishop reviewed NPL procedures in accordance with work being performed on the new service line being installed.

b. An in-depth review of procedures was conducted when the service line pipe and mechanical fitting was installed. No issues were found.

c. David Bishop checked the calibration of the CGI and fire extinguisher while construction work was being performed. All equipment was up to date.

d. Minor delay was encountered on the installation of the new service line due to mismarks of all underground facilities at the site by Utilquest. A clear order was issued after the facility lines were re-marked in accordance with VA Dig Law. After waiting the required time for notification of the clear order to end, construction work started.

e. Yes, the inspection was of adequate length and performed in a professional manner.

- 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:

Yes, David Bishop has completed all required courses at TQ to meet the Gas Inspector qualification. He conducted the

inspection in a safe and professional method. He clearly demonstrated an excellent knowledge of the pipeline safety regulations during this construction inspection.

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- 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:

Yes, David Bishop conducted an exit interview with NPL crew supervisor at the end of the day. NPL had no comments about the exit interview and was made aware a follow-up with the VA SCC Damage Prevention division in regard to the miss marked facilities would occur in the next week. No items of concerns or violations were found.

- 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. The inspection was performed in a safe and controlled area. All personnel were wearing safety vest, steel toe boots, hard hats and safety glasses.
 - b. The installation of 70 feet of 3/4 inch MDPE pipe manufactured by Drisco Plex on 2/23/2022 to ASTM D2513 at 18000 Marsh Pine Road in Dumfries, VA. NPL crew opened up a trench & installed approximately 70 feet of MDPE service line at a depth of 42 inches. Crew members installed crushed rock in the bottom of the trench prior to installing the service line along with tracer wire. Service line was scraped, marked, cleaned, and stabbed to the riser. Same procedure was followed on tapping tee to the main.
 - c. Excellent field notes were taken and recorded by inspector.
 - d. N/A
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- 7 General Comments: Info Only Info Only
Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section of the state program evaluation review.

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 program reviews the annual DOT reports of operators for accuracy and analyzed data for trends and operator issues during the annual information request, March of each year. When conducting applicable inspections, such as F1, F2, and IM program inspections, division damage data and both internal and operator annual reports are reviewed through PDM or local copies submitted to the State Program.

Annual report data is also supplied as a weighted variable in the Division's risk model.

- | | | | |
|----------|--|---|---|
| 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:

Each pipeline operator is under Commission Order to report all pipeline damages and Disturbances to the State Program under URS-2020-00439. Operators are required to report to the Commission all probable violations of the Damage Prevention Act on the Commission's DPA-1 Incident Report Form.

- | | | | |
|----------|--|---|---|
| 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:

Reviewed the analysis data with the VA SCC in which the data from Part D of the annual report was analyzed in detailed for root causes. That data was depicted in percentage charts, broken down by mismarks, mapping errors, mis-locates, etc.

- | | | | |
|----------|---|---|---|
| 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 VA SCC has collected data and evaluated trends on the number of pipeline damages per 1,000 locates. Based on the state analysis, contractors cause the highest number of pipeline damages. The local one-call provides training to locating contractors that continuously damage pipelines.

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:

Region will complete these questions at the end of the calendar year and forward to Zach Barrett for including any issues in letter to the Chair.

- 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:

Region will complete these questions at the end of the calendar year and forward to Zach Barrett for including any issues in letter to the Chair.

- 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:

Region will complete these questions at the end of the calendar year and forward to Zach Barrett for including any issues in letter to the Chair.

- 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:

Region will complete these questions at the end of the calendar year and forward to Zach Barrett for including any issues in letter to the Chair.

- 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:

Region will complete these questions at the end of the calendar year and forward to Zach Barrett for including any issues in letter to the Chair.

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

Evaluator Notes:

Region will complete these questions at the end of the calendar year and forward to Zach Barrett for including any issues in letter to the Chair.

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