



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

Washington Utilities and Transportation 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: Washington

Agency Status:

Date of Visit: 06/27/2023 - 10/19/2023

Agency Representative: Mr. Scott Rukke
Director, Pipeline Safety

PHMSA Representative: Clint Stephens
State Liaison

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

Name/Title: Mr. David W. Danner, Chairman
Agency: Washington Utilities and Transportation Commission
Address: 621 Woodland Square Loop SE
City/State/Zip: Lacey, WA 98503

Rating:

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

There were no issues with accuracy in the 2022 Gas Progress Report.

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



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

Yes. Section 14 - General and Specialized Insp Procedures; Section 15 & 16 - Pre-Inspection and Post-inspection activities; Sections - 22 (IMP) and 36 (DIMP); Section 17 ? OQ; Section 31 - Damage Prevention Enforcement; Section 27 - Training and Outreach Policy; Section 21 - Design, Testing & Construction Inspections; Section 13 - LNG inspection frequency (not to exceed 3 yrs.); and Section 33 - CRM inspections.

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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:

Procedures are located in Sections 13 and 13.1.

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

Yes. Sections 15 - Standard Intra Inspections & Correspondence, Section 25 - Compliance Enforcement Tracking Policy, Section 26 - Follow-up Inspection Policy, Section 34 - Compliance and Enforcement Policy, and Section 37 - Civil Penalty Consideration Factor Policy.

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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 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:

Yes. Section 10 - On-Call and Telephonic Notification, Section 20 - Response to Pipeline Incidents, Section 24 - Investigations Policy, Section 24 Appendix B - Level of Investigation Matrix, and Section Appendix A ? PHMSA Investigation Form.

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:

New employees: Tom Green and Jason Hoxit hired in 2023. Darren Tinnerstet qualified to lead Gas/HL inspections. Did not take ECDA course (not IM qual). All staff have completed OQ, DIMP, IMP, LNG training to lead inspections. Inspectors and program manager have taken Root Cause training. No issues.

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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:

State program manager indicated 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:

Yes. Reviewed following inspection intervals:

Standard: Puget Sound Energy, Ellensburg Gas Dept., Cascade Natural Gas, Avista Corp, Northwest Natural Gas, City of Enumclaw, Ferndale Pipeline System, LAMB WESTON/BSW, NOURYON PULP AND PERFORMANCE CHEMICALS LLC, SOLVAY CHEMICALS, INC., INLAND EMPIRE PAPER CO., AUGAN RNG PROJECT LLC (new operator - initial inspection 10/11/22) Puget Sound Energy (LNG), NW Natural (LNG); Ferrelgas (new as of 2019 - LPG), Puget Sound Energy (LPG), Snug Harbor Resort (LPG), Sunshine Propane (LPG), The New Roche Harbor Resort (Snug Harbor), Mount Vernon Terrace Apartments;

PAP: Puget Sound Energy, Ellensburg Gas Dept., Cascade Natural Gas, Avista Corp., Northwest Natural Gas, City of Enumclaw, Ferndale Pipeline System, LAMB WESTON/BSW, NOURYON PULP AND PERFORMANCE CHEMICALS LLC, SOLVAY CHEMICALS, INC., INLAND EMPIRE PAPER CO., Puget Sound Energy (LNG), NW Natural (LNG)

D&A: Puget Sound Energy, Ellensburg Gas Dept., Cascade Natural Gas, Avista Corp., Northwest Natural Gas, City of Enumclaw, Ferndale Pipeline System, LAMB WESTON/BSW, NOURYON PULP AND PERFORMANCE CHEMICALS LLC, SOLVAY CHEMICALS, INC., INLAND EMPIRE PAPER CO.

CRM: Ferndale Pipeline System ? still pending waiting on PHMSA to close-out

OQ: Puget Sound Energy, Ellensburg Gas Dept., Cascade Natural Gas, Northwest Natural Gas, Northwest Natural Gas, Ferndale Pipeline System, LAMB WESTON/BSW, NOURYON PULP AND PERFORMANCE CHEMICALS LLC, SOLVAY CHEMICALS, INC., INLAND EMPIRE PAPER CO., AUGAN RNG PROJECT LLC (new operator - initial inspection 10/11/22), Mount Vernon Terrace Apartments.

DIMP/IMP: Puget Sound Energy, Ellensburg Gas Dept., Cascade Natural Gas, Northwest Natural Gas, City of Enumclaw, Ferndale Pipeline System, LAMB WESTON/BSW ? no HCA based on annual report, NOURYON PULP AND PERFORMANCE CHEMICALS LLC. - no HCA based on annual report, SOLVAY CHEMICALS, INC. - no HCA based on annual report, INLAND EMPIRE PAPER CO. - no HCA based on annual report, AUGAN RNG PROJECT LLC

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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:

Yes. Reviewed the following inspection reports:

Standard: Puget Sound Energy (HQ, Pierce Co. - Form C 8448 King Co. East, Kittias); City of Ellensburg (annual review 8429); Cascade NG (Walla Walla, Yakima, HQ ? annual review 8422); Avista Corp. (HQ annual review, Spokane);

Northwest Natural (HQ annual review); City of Enumclaw (annual review); Ferndale P/L System (annual review); Augean RNG, Puget Sound Energy (LPG ? 2021); Sunshine Propane; The New Roche Harbor Resort; Valley View Motel (2021) Section 114: Puget Sound Energy; City of Ellensburg; Cascade NG ? OK; Avista Corp (HQ) ? Lead inspector Paulo Pinto; Northwest Natural (HQ); City of Enumclaw; Ferndale P/L System; Lamb Weston/BSW; Nouryon Pulp; Solvay Chemicals; Inland Empire; Augean RNG, Ferrell Gas; Snug Harbor Resort (LPG) ? is it applicable; Sunshine Propane; The New Roche Harbor Resort ? is it applicable; Mount Vernon Terrace Apts (MM)
O&M: Puget Sound Energy; City of Ellensburg; City of Enumclaw; Solvay Chemicals ? Blank inspection form - OK
PA: Cascade NG (HQ); Lamb Weston/BSW ? did not see response from operator - ok; Solvay Chemicals; Inland Empire
LNG: Puget Sound Energy, Northwest Natural (2021)
Construction: Cascade NG (Yakima, Sunnyside)

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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:

There were no OQ program inspections performed based on the list of random operators. No issues.

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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 | 2 |
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Evaluator Notes:

Yes. DIMP/IMP plans being reviewed during the annual reviews (Form A) with each operator.

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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;
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 |
|---|---|---|---|

Evaluator Notes:

- a. & b. There is no CI in the state of WA.
 - c. Form C
 - d. annual review Form A
 - e. Form V
 - f. No low-pressure systems in state of WA.
 - g. Form A
- There are no issues.

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 ADBs are discussed with operators during the annual reviews and is documented in Form A.

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	10	10
	<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 had no issues with following procedures from discovery to resolution, and adequately documenting all probable violations, including further course of action to gain compliance. Requested state follow-up with PHMSA on the CRM inspection for Ferndale.

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

The incident that occurred with Puget Sound Energy on September 15, 2022, is still open. WA UTC met with operator last week. Hoping to have response from operator within the next couple of weeks. Requested response from Carrie on including interstate operator incident reports in Attachment 4 of the Progress Report ? continue doing - OK.

- 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:

Letter sent on June 24, 2022; response received on July 29, 2022. No issues.

- 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:

WA UTC had their last seminar on June 16, 2018. Need to follow-up with scheduling seminar with possibly another State or have operator meeting in 2024.

- 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:

The state is confirming with transmission operators that they have submitted information into NPMS during the annual reviews ? Form A.

- 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:

The WA UTC web site provides information and links to other external resources including Call Before You Dig, State and Federal Pipeline Safety Rules, Pipeline News, completed inspection reports, forms and compliance letters, Failure Investigation reports, enforcement action information, and the Citizens Committee on Pipeline Safety.

- 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:

There were no open SRC Reports in PDM.

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

Evaluator Notes:

The state is responsive to surveys or information requests from NAPSRS or PHMSA. The WA UTC has completed tasks in WMS.

- 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:

There are four waivers on PHMSA website. They were discussed with the PM. There is a 2016 waiver for Puget Sound Energy that is still in effect.

16	Were pipeline program files well-organized and accessible? Info Only = No Points	Info Only	Info Only
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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? Yes = 3 No = 0 Needs Improvement = 1-2	3	3
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Evaluator Notes:

The WA UTC has discussed with Rex Evans about adjusting SICT numbers to coincide with loss of staff and new staff not qualified to lead inspections.

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	Info Only	Info Only
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Evaluator Notes:

Discussed performance metrics with WA UTC. No negative trends.

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 a. https://pipelinesms.org/ b. Reference AGA recommendation to members May 20, 2019	Info Only	Info Only
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Evaluator Notes:

This is discussed with the operators during the annual reviews and documented on Form A.

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

Operator: J.R. Simplot Co.
Inspector: Anthony Dorrough
Location: Moses Lake, WA
Date: 6/28-29/2023
PHMSA Rep: Clint Stephens

The inspector performed a standard comprehensive inspection. The pipeline operator 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 inspector used IA (Inspection Assistant) as a guide during 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:

The inspector reviewed O&M procedures and records. The inspector observed the operation of valves and leak check (CGI). The inspection was of adequate length.

- 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 inspector conducted an exit interview, suggesting the operator improve its patrol record keeping.

- 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 inspection was performed in a safe, positive, and constructive manner. The inspector observed the operation of valves, pipe-to-soil reading, and a leak check with a combustible gas indicator.

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

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|---|--|---|---|
| 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 is reviewing operator annual reports, along with incident/accident report data in the annual review ? Form A. This information is reviewed for accuracy and analyzed for trends and operator issues.

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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 |
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Evaluator Notes:

The state has verified that the operator has analyzed excavation damages root causes and minimizing the possibility of recurrence through its information gathering in the annual review with operators and documented in Form A.

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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 the operator's annual report pertaining to Part D ? Excavation Damage where this information is gathered and analyzed in the annual review with operators and documented on Form A.

- | | | | |
|---|---|---|---|
| 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?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? | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Yes. The WA UTC has collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests with this information being gathered and documented on Form A. The state has pipe charts depicting data analysis of root causes. The state provides training to excavators on annual basis. There is mandatory reporting through DIRT.

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