



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

1200 New Jersey Avenue SE  
Washington DC 20590

# 2010 Natural Gas State Program Evaluation

for

Washington Utilities and Transportation Commission

## Document Legend

### PART:

- O -- Representative Date and Title Information
- A -- General Program Qualifications
- B -- Inspections and Compliance - Procedures/Records/Performance
- C -- Interstate Agent States
- D -- Incident Investigations
- E -- Damage Prevention Initiatives
- F -- Field Inspection
- G -- PHMSA Initiatives - Strategic Plan
- H -- Miscellaneous
- I -- Program Initiatives



2010 Natural Gas State Program Evaluation -- CY 2010  
Natural Gas

**State Agency:** Washington

**Agency Status:**

**Date of Visit:** 06/27/2011 - 07/01/2011

**Agency Representative:** David Lykken, Pipeline Safety Director  
Steven King, Director Safety & Consumer Protection  
Joe Subsits, Chief Engineer  
Jim Fernald, Operations Manager

**PHMSA Representative:** Glynn Blanton, DOT/PHMSA State Programs

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

**Name/Title:** Jeffrey D. Goltz, Chairman  
**Agency:** Washington Utilities and Transportation Commission  
**Address:** 1300 S. Evergreen Park Drive SW, PO Box 47250  
**City/State/Zip:** Olympia, WA 98504-7250

**Rating:**

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

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**INSTRUCTIONS:**

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2010 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. 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 space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual certification/agreement attachments provide the basis for determining the state's pipeline safety grant allocation.

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**Field Inspection (PART F):**

The field inspection form used will allow different areas of emphasis to be considered for each question. Question 13 is provided for scoring field observation areas. In completing PART F, the PHMSA representative should include a written summary which thoroughly documents the inspection.

**Scoring Summary**

**PARTS**

**Possible Points    Points Scored**

A	General Program Qualifications	24	21
B	Inspections and Compliance - Procedures/Records/Performance	24.5	24.5
C	Interstate Agent States	7	7
D	Incident Investigations	7	7
E	Damage Prevention Initiatives	9	9
F	Field Inspection	9	9
G	PHMSA Initiatives - Strategic Plan	10	10
H	Miscellaneous	3	3
I	Program Initiatives	9	9

**TOTALS**

**102.5                      99.5**

**State Rating** ..... **97.1**

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## PART A - General Program Qualifications

Points(MAX) Score

- |          |  |                                     |   |
|----------|--|-------------------------------------|---|
| <b>1</b> | Did the state submit complete and accurate information on the attachments to its most current 60105(a) Certification/60106 (a) Agreement? (NOTE: PHMSA Representative to verify certification/agreement attachments by reviewing appropriate state documentation. Score a deficiency in any one area as "needs improvement". Attachment numbers appear in parenthesis) Previous Question A.1, Items a-h worth 1 point each<br>Yes = 8 No = 0 Needs Minor Improvement = 3-7 Needs Major Improvement = 2 | 8                                   | 8 |
| <hr/>    |  |                                     |   |
| a.       | State Jurisdiction and agent status over gas facilities (1)  | <input checked="" type="checkbox"/> |   |
| b.       | Total state inspection activity (2)  | <input checked="" type="checkbox"/> |   |
| c.       | Gas facilities subject to state safety jurisdiction (3)  | <input checked="" type="checkbox"/> |   |
| d.       | Gas pipeline incidents (4)   | <input checked="" type="checkbox"/> |   |
| e.       | State compliance actions (5)   | <input checked="" type="checkbox"/> |   |
| f.       | State record maintenance and reporting (6)   | <input checked="" type="checkbox"/> |   |
| g.       | State employees directly involved in the gas pipeline safety program (7)   | <input checked="" type="checkbox"/> |   |
| h.       | State compliance with Federal requirements (8)   | <input checked="" type="checkbox"/> |   |

### SLR Notes:

Information reviewed in 2011 Natural Gas Certification attachments 1, 2 & 3 are correct with inspection units and activities. All incident reports, attachment 4, were submitted with good details of the incidents and information on cause code was entered correctly. List of records maintained by the agency on their inspection program was reviewed and found to be complete. Training requirements for pipeline safety staff in attachment 7 was found to be correct and meets the requirements of the federal guidelines.

A review of Joe Subsits and Kuang Chu category classifications in the certification document with David Lykken confirmed each individual is a registered Engineer and has a minimum of three years experience in pipeline safety and successfully completed the T&Q courses. This meets the requirements as described in the guidelines manual located on page 14 in Section 4-1, Categories and Qualifications for State Agency Inspectors.

Discussed moving Jim Fernald, Operations Manager, into the Clerical and Administrative Support section on the 2012 Certification filing due to his duties and responsibilities are similar to those position and do avoid having to meet the training requirements listed in the guidelines for states participating in the pipeline safety program.

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|----------|---|---|---|
| <b>2</b> | Did the state have an adequate mechanism to receive operator reporting of incidents to ensure state compliance with 60105(a) Certification/60106(a) Agreement requirements (fatality, injury requiring hospitalization, property damage exceeding \$50,000 - Mechanism should include receiving "after hours" reports)? (Chapter 6) Previous Question A.2<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

### SLR Notes:

Yes, incident reporting is required under WUTC's rule 480-93-200, section 1. The telephone number is 888-321-9146.

- |          |   |   |   |
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| <b>3</b> | Has the state held a pipeline safety TQ seminar(s) in the last 3 years? (NOTE: Indicate date of last seminar or if state requested seminar, but T&Q could not provide, indicate date of state request for seminar. Seminars must be held at least once every 3 calendar years.) (Chapter 8.5) Previous Question A.4<br>Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

### SLR Notes:

Yes. Last seminar was held in June 17-18, 2009. The next scheduled seminar will be held with Idaho PSC in the fall, the week of November 5th 2012.

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|----------|--|---|---|
| <b>4</b> | Were pipeline safety program files well-organized and accessible?(NOTE: This also includes electronic files) (Chapter 5) Previous Question A.5<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

### SLR Notes:

Yes. The files were well organized and accessible by file folders located in the office. In 2012, WUTC will be going to a electronic database that will be accessible by all pipeline safety personnel.

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|----------|---|---|---|
| <b>5</b> | Did state records and discussions with the state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? (Chapter 4.1, Chapter 8.1) Previous Question A.6<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

### SLR Notes:

Yes, David Lykken has a good working knowledge of the pipeline safety program. He started his career with the WUTC in 2000 and has over 11 years of experience in pipeline safety serving as Chief Engineer for 6 years.

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|----------|---|---|----|
| <b>6</b> | Did the state respond in writing within 60 days to the requested items in the Chairman's letter following the Region's last program evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8 | 1 | NA |
|----------|---|---|----|

Yes = 1 No = 0

**SLR Notes:**

No response was necessary due to no items of concern were found or noted.

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|-------------------------------|--|---|----|
| <b>7</b>                      | What actions, if necessary, did the State initiate as a result of issues raised in the Chairperson's letter from the previous year? Did actions correct or address deficiencies from previous year's evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8/A.9 | 1 | NA |
| <small>Yes = 1 No = 0</small> |  |   |    |

**SLR Notes:**

No response was required.

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## Personnel and Qualifications

- |                               |  |   |   |
|-------------------------------|--|---|---|
| <b>8</b>                      | Has each inspector fulfilled the 3 year TQ training requirement? If No, has the state been granted a waiver regarding TQ courses by the Associate Administrator for Pipeline Safety? (NOTE: If the State has new inspectors who have not attended all TQ courses, but are in a program which will achieve the completion of all applicable courses within 3 years of taking first course (5 years to successfully complete), or if a waiver has been granted by the applicable Region Director for the state, please answer yes.) (Chapter 4.4) Previous Question A.10 | 3 | 0 |
| <small>Yes = 3 No = 0</small> |  |   |   |

**SLR Notes:**

No, Stephanie Zuchlke has not completed all the required training. PL3257, Enforcement course, was not completed in calendar year 2010. Loss of three points due to not completing the course in the required three year period.

David Cullom, Pipeline Safety Engineer, was transferred into the division at middle year and has experience in pipeline safety dealing with the GIS system. He attended the PL1250 course in December, 2010.

- |   |  |           |           |
|---|--|-----------|-----------|
| <b>9</b>  | Brief Description of Non-TQ training Activities: | Info Only | Info Only |
| <small>Info Only = No Points</small>  |  |           |           |
| For State Personnel:<br>State personnel: On October 26-27, 2010 House Fire Explosion Investigation Training was conducted in-house with all engineers attended the course. The course was presented by Sammy Russo. Additionally, on November 16, 2010, all engineers attend the Incident Investigation/Root Cause Analysis Training conducted by Baker Engineering & Risk Consultants, Inc. at their location.   |  |           |           |
| For Operators:<br>Two damage prevention training seminars were conducted in Vancouver and Spokane, WA. Representatives from the operators and contractor communities were in attendance. Approximately, sixty-six individuals attended the training meetings. Operator Qualification "Train the Evaluator" course was conducted by APGA Security & Integrity Foundation organization on November 19, 2010 in Olympia, WA. Several industry representatives and one WUTC member participated in the class. |  |           |           |
| For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:<br>WUTC continues to participate in the Citizens Committee on Pipeline Safety meetings providing education on pipeline safety regulations and initiatives from PHMSA.  |  |           |           |

**SLR Notes:**

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- |                               |   |   |   |
|-------------------------------|---|---|---|
| <b>10</b>                     | Did the lead inspectors complete all required T&Q OQ courses and Computer Based Training (CBT) before conducting OQ Inspections? (Chapter 4.4.1) Previous Question A.12 | 1 | 1 |
| <small>Yes = 1 No = 0</small> |   |   |   |

**SLR Notes:**

Yes, all lead engineers have completed the required T&Q courses and computer based training before conducting OQ inspections. David Cullom, Pipeline Safety Engineer, is scheduled to attend the OQ training and complete the WBT course in 2012.

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- |                               |  |   |   |
|-------------------------------|--|---|---|
| <b>11</b>                     | Did the lead inspectors complete all required TQ Integrity Management (IMP) Courses/Seminars and CBT before conducting IMP Inspections? (Chapter 4.4.1) Previous Question A.13 | 1 | 1 |
| <small>Yes = 1 No = 0</small> |  |   |   |

**SLR Notes:**

Yes, Joe Subsits, Scott Rukke, Chu Kuang are the lead engineers and have completed all required courses.

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- |                               |   |   |   |
|-------------------------------|---|---|---|
| <b>12</b>                     | Was the ratio acceptable of Total inspection Person-days to Total Person-days charged to the program by state inspectors? (Region Director may modify points for just cause) (Chapter 4.3) Previous Question B.12 | 5 | 5 |
| <small>Yes = 5 No = 0</small> |   |   |   |

A. Total Inspection Person Days (Attachment 2):

636.23

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):

220 X 6.32 = 1390.40

Ratio: A / B

636.23 / 1390.40 = 0.46

If Ratio  $\geq$  0.38 Then Points = 5, If Ratio  $<$  0.38 Then Points = 0

Points = 5

**SLR Notes:**

A= 636.23 total inspection person days: B (220 x 6.36 = 1390.4) A/B= 0.46. This amount meets the larger amount and an award of five points is charged in this category.

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<b>13</b>	Have there been modifications or proposed changes to inspector-staffing levels? (If yes, describe) Previous      Info Only      Info Only
	Question B.13
	Info Only = No Points

**SLR Notes:**

Yes, David Cullom, Pipeline Safety Engineer, was transferred into the division at the end of 2010.

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<b>14</b>	Part-A General Comments/Regional Observations	Info Only      Info Only
	Info Only = No Points	

**SLR Notes:**

Question 8: No, Stephanie Zuchlke has not completed all the required training. PL3257, Enforcement course, was not completed in calendar year 2010. Loss of three points due to not completing the course in the required three year period.

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Total points scored for this section: 21  
Total possible points for this section: 24



## PART B - Inspections and Compliance - Procedures/Records/ Performance

Points(MAX) Score

### Inspection Procedures

<b>1</b>	Does the State have a written inspection plan to complete the following? (all types of operators including LNG) (Chapter 5.1) Previous Question B.1 + Chapter 5 Changes + Incorporate LNG Yes = 6.5 No = 0 Needs Improvement = 50% Deduction	6.5	6.5
a	Standard Inspections (Including LNG) (Max points = 2)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Needs Improvement <input type="radio"/>
b	IMP Inspections (Including DIMP) (Max points = .5)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Needs Improvement <input type="radio"/>
c	OQ Inspections (Max points = .5)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Needs Improvement <input type="radio"/>
d	Damage Prevention (Max points = .5)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Needs Improvement <input type="radio"/>
e	On-Site Operator Training (Max points = .5)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Needs Improvement <input type="radio"/>
f	Construction Inspections (Max points = .5)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Needs Improvement <input type="radio"/>
g	Incident/Accident Investigations (Max points = 1)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Needs Improvement <input type="radio"/>
h	Compliance Follow-up (Max points = 1)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Needs Improvement <input type="radio"/>

#### SLR Notes:

WUTC added Section 26, Compliance Follow-up Inspection and Section 31, Damage Prevention to their WUTC Pipeline Safety Section Policy & Procedures Manual on June, 2010 to address the items listed in the Program Manager letter that needs improvement. Listed below are additional information of the location of the items listed in section a thru h above.

- a: Yes, WUTC Pipeline Safety Section Policy & Procedures Manual, Section 14, 15 & 16 address this item.
- b: Yes, WUTC Pipeline Safety Section Policy & Procedures Manual, Section 22
- c: Yes, WUTC Pipeline Safety Section Policy & Procedures Manual, Section 17
- d: Yes, WUTC Pipeline Safety Section Policy & Procedures Manual, Section 31
- e: Yes, WUTC Pipeline Safety Section Policy & Procedures Manual, Section 27
- f: Yes, WUTC Pipeline Safety Section Policy & Procedures Manual, Section 21
- g: Yes, WUTC Pipeline Safety Section Policy & Procedures Manual, Section 20
- h: Yes, WUTC Pipeline Safety Section Policy & Procedures Manual, Section 26

<b>2</b>	Did the written Procedures for selecting operators adequately address key concerns? (Chapter 5.1) Previous Question B.2, items a-d are worth .5 point each Yes = 2 No = 0 Needs Improvement = 50% Deduction	2	2
a	Length of time since last inspection	Yes <input checked="" type="radio"/> No <input type="radio"/>	Needs Improvement <input type="radio"/>
b	History of Operator/unit and/or location (including leakage , incident and compliance history)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Needs Improvement <input type="radio"/>
c	Type of activity being undertaken by operator (construction etc)	Yes <input checked="" type="radio"/> No <input type="radio"/>	Needs Improvement <input type="radio"/>
d	For large operators, rotation of locations inspected	Yes <input checked="" type="radio"/> No <input type="radio"/>	Needs Improvement <input type="radio"/>

#### SLR Notes:

Yes, WUTC Pipeline Safety Section Policy & Procedures Manual and data base program includes these items. Each inspection visit is determined by a risk ranking method developed by Joe Subsits and reviewed by each staff member. WUTC inspects all operators on their risk ranking model or within three years from the last inspection performed.

### Inspection Performance

<b>3</b>	Did the state inspect all types of operators and inspection units in accordance with time intervals established in its written procedures? (Chapter 5.1) Previous Question B.3 Yes = 2 No = 0	2	2
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#### SLR Notes:

Yes, They are also reviewing potential master meter operators that will be included in their pipeline safety program in the future. In 2010, they surveyed more than thirty potential operators and ten have been included in their potential list in the future.

<b>4</b>	Did the state inspection form cover all applicable code requirements addressed on the Federal Inspection forms? (Chapter 5.1 (3)) Previous Question B.4 Yes = 1 No = 0	1	1
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#### SLR Notes:

Yes. I reviewed their inspection forms and found all items in the federal inspection document match their WUTC forms.

<b>5</b>	Did state complete all applicable portions of inspection forms? (Chapter 5.1 (3)) Previous Question B.5	1	1
	Yes = 1 No = 0		

**SLR Notes:**

Yes, WUTC has included their commission rules with the federal regulations on their inspection forms. All forms were found to be complete and being used by all staff members.

<b>6</b>	Did the state initiate appropriate follow-up actions to Safety Related Condition Reports? (Chapter 6.3) Previous Question B.6	.5	NA
	Yes = .5 No = 0		

**SLR Notes:**

No safety reports were submitted or filed in 2010.

<b>7</b>	Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Previous Question B.7	.5	.5
	Yes = .5 No = 0		

**SLR Notes:**

Yes, WUTC has this item in their standard inspection form but all cast iron pipelines have been removed in the State of Washington.

<b>8</b>	Did the state review 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) (NTSB) Previous Question B.8	.5	.5
	Yes = .5 No = 0		

**SLR Notes:**

Yes, the WUTC has this item in their standard inspection form but all cast iron pipeline has been removed from the State of Washington.

<b>9</b>	Did the state review 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? (NTSB) Previous Question B.9	.5	.5
	Yes = .5 No = 0		

**SLR Notes:**

Yes, WUTC has a state rule WAC 480-93-186 Leak Evaluation that address this requirement and it is included in their inspection form.

<b>10</b>	Did the state review 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? (NTSB) Previous Question B.10	1	1
	Yes = 1 No = 0		

**SLR Notes:**

Yes, this is covered in their standard inspection form.

## Compliance - 60105(a) States

<b>11</b>	Did the state adequately document sufficient information on probable violations? (Chapter 5.2) Previous Question B.14	1	1
	Yes = 1 No = 0 Needs Improvement = .5		

**SLR Notes:**

Yes, a review of probable violation against Cardinal Pacific FG Company on March 29, 2010 was reviewed. The documentation was followed in accordance with their written procedures.

<b>12</b>	Does the state have written procedures to identify the steps to be taken from the discovery to the resolution of a probable violation as specified in the "Guidelines for State Participating in the Pipeline Safety Program"? (Chapter 5.1) Previous Question D(1).1	1	1
	Yes = 1 No = 0 Needs Improvement = .5		

**SLR Notes:**

Yes, this information is completed and described in WUTC Pipeline Safety Policy and Procedure Manual Section 34.

<b>13</b>	Does the state have written procedures to notify an operator when a noncompliance is identified as specified in the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(4)) Previous Question D(1).2	1	1
	Yes = 1 No = 0 Needs Improvement = .5		

SLR Notes:

Yes, this information is completed and described in WUTC Pipeline Safety Policy and Procedure Manual Section 34, pages 49 thru 65.

- |           |  |   |   |
|-----------|--|---|---|
| <b>14</b> | Does the state have a written procedure for routinely reviewing the progress of compliance actions to prevent delays or breakdowns of the enforcement process, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(5)) Previous Question D(1).3<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

SLR Notes:

Yes, this is accomplished by the WUTC "Project Tracking System".

- |           |  |   |   |
|-----------|--|---|---|
| <b>15</b> | Has the State issued compliance actions for all probable violations discovered? (Note : PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation) Previous Question D(1).4<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|

SLR Notes:

Yes, WUTC issues compliance action in the form of either accepting the operator's response to their compliance letter or may offer a proposed settlement before going to a formal complaint.

- |           |  |   |   |
|-----------|--|---|---|
| <b>16</b> | Did the state follow its written procedures for reviewing compliance actions and follow-up to determine that prompt corrective actions were taken by operators, within the time frames established by the procedures and compliance correspondence, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? Previous Question D(1).5<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

SLR Notes:

Yes, WUTC Pipeline Safety Policy and Procedures identifies this item in Section 26. This revision was conducted and effective on June 22, 2010.

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|-----------|---|---|---|
| <b>17</b> | If compliance could not be established by other means, did state pipeline safety program staff request formal action, such as a "Show Cause Hearing" to correct pipeline safety violations? (check each states enforcement procedures) Previous Question D(1).6<br>No = 0 Yes = 1 | 1 | 1 |
|-----------|---|---|---|

SLR Notes:

Yes, WUTC has the authority through the Commission's rules and regulations.

- |           |  |   |   |
|-----------|--|---|---|
| <b>18</b> | Did the state adequately document the resolution of probable violations? (Chapter 5.1 (6)) Previous Question D(1).7<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

SLR Notes:

Yes, a review of the file on Cardinal FG Company pertaining to probable violations cited on March 29-31, 2010 and settlement offered by the company indicate the agency is adequately documenting all violations.

- |           |  |    |    |
|-----------|--|----|----|
| <b>19</b> | Were compliance actions sent to a company officer? (manager or board member if municipal/government system) (Chapter 5.1(4)) Previous Question D(1).8<br>Yes = .5 No = 0 | .5 | .5 |
|-----------|--|----|----|

SLR Notes:

Yes, a review of letters and other correspondence to the operators indicate all information is being sent to the company officer or manager of the distribution system.

- |           |   |   |   |
|-----------|---|---|---|
| <b>20</b> | Did the compliance proceedings give reasonable due process to all parties? (check each states enforcement procedures) Previous Question D(1).9<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

SLR Notes:

Yes, this information is described in WUTC's Pipeline Safety Policy & Procedures, Section 34. Safety & Consumer Protection Division Compliance & Enforcement Manual.

## Compliance - 60106(a) States

- |           |   |   |    |
|-----------|---|---|----|
| <b>21</b> | Did the state use the current federal inspection form(s)? Previous Question D(2).1<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|-----------|---|---|----|

SLR Notes:



22	Are results adequately documented demonstrating inspection units were reviewed in accordance with state inspection plan? Previous Question D(2).2 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

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23	Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) Previous Question D(2).3 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

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24	Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question D(2).4 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

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25	Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(2).5 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

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26	Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? Previous Question D(2).6 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

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27	Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken) Info Only = No Points	Info Only	Info Only
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SLR Notes:

Yes, program manager is familiar with state process and the issue of repeated violations.

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28	Part B: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only
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SLR Notes:

No issues or areas of concern.

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Total points scored for this section: 24.5  
Total possible points for this section: 24.5

## PART C - Interstate Agent States

Points(MAX)    Score

- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | Did the state use the current federal inspection form(s)? Previous Question D(3).1<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

**SLR Notes:**

Yes, they are using the federal inspection forms. A review of the inspection performed on Williams Gas Pipeline on January 4, 2010 indicated this requirement is being met.

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? Previous Question D(3).2<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**SLR Notes:**

Yes, information is well documented and demonstrated the inspection units were reviewed in accordance with PHMSA directed inspection plan.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? Previous Question D(3).3<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

**SLR Notes:**

Yes, WUTC submits within thirty days to PHMSA all required documentation on the inspections performed.

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) Previous Question D(3).4<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

**SLR Notes:**

Yes, a review of the documentation pertaining to TransCanada Transmission Northwest inspection performed on August 23-27, 2010 was forwarded to PHMSA Western Region on November 10, 2010 regarding three probable violations.

- |          |  |   |   |
|----------|--|---|---|
| <b>5</b> | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question D(3).5<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**SLR Notes:**

No imminent safety concerns were reported in 2010.

- |          |  |   |   |
|----------|--|---|---|
| <b>6</b> | Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(3).6<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

**SLR Notes:**

Yes, information reviewed in their files indicates WUTC is providing the information to PHMSA within thirty days.

- |          |  |   |   |
|----------|--|---|---|
| <b>7</b> | Did the state initially submit documentation to support compliance action by PHMSA on probable violations? Previous Question D(3).7<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**SLR Notes:**

Yes, a review of the TransCanada Transmission Northwest inspection documentation supports all federal reporting forms and information is being provided.

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>8</b> | Part C: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

**SLR Notes:**

No issues or areas of concern in this section.

Total points scored for this section: 7  
Total possible points for this section: 7

## PART D - Incident Investigations

Points(MAX) Score

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Are state personnel following the procedures for Federal/State cooperation in case of an incident? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6.1) Previous Question E.1<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

### SLR Notes:

Yes, reviews of the five incidents reported in 2010 indicate they are following their written procedures pertaining to working with PHMSA on accidents and incidents.

- |          |   |    |    |
|----------|---|----|----|
| <b>2</b> | Are state personnel familiar with the jurisdictional authority and Memorandum of Understanding between NTSB and PHMSA? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6 ? Appendix D) Previous Question E.2<br>Yes = .5 No = 0 | .5 | .5 |
|----------|---|----|----|

### SLR Notes:

Yes, they are familiar with the Memorandum of Understanding between NTSB and PHMSA.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | Did the state keep adequate records of incident notifications received? Previous Question E.3<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

### SLR Notes:

Yes, all incident reports are recorded and maintained by WUTC. In 2010, WUTC had 106 state reportable incidents which must be reported by the operators in compliance with WAC Rule 480-93-200. "Reporting Requirements".

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | If an onsite investigation of an incident was not made, did the state obtain sufficient information by other means to determine the facts and support the decision not to go on-site? Previous Question E.4<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

### SLR Notes:

Yes, onsite investigations were conducted on the Northwest Pipeline Corp on September 3, 2010, Northwest Natural on October 30, 2010 and Cascade Natural Gas Corporation on November 11, 2010.

- |          |   |                                      |  |
|----------|---|--------------------------------------|--|
| <b>5</b> | Were investigations thorough and conclusions and recommendations documented in an acceptable manner? Previous Question E.5, comprehensive question worth 2 points total<br>Yes = 2 No = 0 Needs Improvement = 1 | 2                                    | 2  |
| a.       | Observations and Document Review  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b.       | Contributing Factors  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| c.       | Recommendations to prevent recurrences where appropriate  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

### SLR Notes:

Information reviewed in the files and folders indicate the investigations were thorough and conclusive with the findings of facts.

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Did the state initiate enforcement action for violations found during any incident investigation(s)? Previous Question E.6 Variation<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

### SLR Notes:

No enforcement action was required by WUTC on the incident investigations conducted in 2010.

- |          |  |    |     |
|----------|--|----|-----|
| <b>7</b> | Did the state assist region office by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate annual report data from operators concerning incidents/accidents and investigate discrepancies) (Chapter 6) Previous Question E.7/E.8<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

### SLR Notes:

WUTC has been responding to the PHMSA Western Region office within ten days of an accident or information pertaining to the DOT Form 7100.

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>8</b> | Part D: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

### SLR Notes:

No issues or areas of concern.

---

Total points scored for this section: 7  
Total possible points for this section: 7



## PART E - Damage Prevention Initiatives

Points(MAX) Score

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Has the state reviewed 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? Previous Question B.11<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

### SLR Notes:

Yes. A review of WUTC Form "V" Intra Gas ? Procedure and Plan Review, section 297 shows this item is included and meets this requirement.

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | Did the state inspector check to assure the pipeline operator is following its written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? New 2008<br>Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

### SLR Notes:

Yes, this requirement is located on WUTC inspection form C.

- |          |   |   |   |
|----------|---|---|---|
| <b>3</b> | Did the state encourage and promote the adoption of the Common Ground Alliance Best Practices document to its regulated companies as a means of reducing damages to all underground facilities? Previous Question A.7<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

### SLR Notes:

Yes. at their excavator trainer meetings on October 5, 2010 in Vancouver, WA and October 13, 2010 they shared information about the Common Ground Alliance Best Practices documents to the excavators in attendance. WUTC continues to support these practices at the Northwest Common Ground regional meetings.

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | 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? New 2008<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

### SLR Notes:

Yes, WUTC has a State Damage Prevention Statistics Mandatory Reporting form requirement for those operators under their jurisdiction to report damages. They have implemented the Virtual DIRT program , a volunteer participation for only pipeline operators to report the number of pipeline damages per 1,000 locate request in 2009. In January 1, 2013, the new damage prevention law will require all underground operators and excavators to report all damages via the Virtual Dirt Program to WUTC.

- |          |  |   |   |
|----------|--|---|---|
| <b>5</b> | Did the state review operators' records of accidents and failures due to excavation damage to ensure causes of failure are addressed to minimize the possibility of recurrence as required by 192.617?<br>Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

### SLR Notes:

Yes, this item is reviewed by staff members on their inspection visits and available on the federal standard inspection form. This review is found on WUTC's Form C Intrastate Gas Distribution, Section 36-40.

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>6</b> | Part E: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

### SLR Notes:

No issues of concern were noted in this section.

Total points scored for this section: 9  
Total possible points for this section: 9

## PART F - Field Inspection

Points(MAX) Score

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>1</b> | Operator, Inspector, Location, Date and PHMSA Representative | Info Only | Info Only |
|          | Info Only = No Points  |           |           |

Name of Operator Inspected:

Georgia Pacific Consumer Products

Name of State Inspector(s) Observed:

Stephanie Zuehlke, Pipeline Safety Engineer

Location of Inspection:

Camas, WA

Date of Inspection:

July 11-12, 2011

Name of PHMSA Representative:

Glynn Blanton, PHMSA State Programs

### SLR Notes:

Stephanie Zuehlke, Pipeline Safety Engineer, was observed two days performing a standard inspection of Georgia Pacific Consumer Products in Camas, WA. The last inspection performed on this operator was in 2008 by Patti Johnson, WUTC Engineer.

On July 11 & 12, 2011 the following individuals were present during the inspection and represented the operator: Steve Ringquist, Reliability Leader, Ron Kramer, HR Manager, Patrick Terry, Sr. Staff Engineer and Roy Rogers, Cathodic Protection, Inc.

- |          |   |   |   |
|----------|---|---|---|
| <b>2</b> | Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? New 2008 | 1 | 1 |
|          | Yes = 1 No = 0  |   |   |

### SLR Notes:

Yes, Steve Ringquest, Georgia Pacific Consumer Products Supervisor and Roy Rogers, a consultant for Georgia Pacific Customer Products, were contacted prior to the inspection visit and provided a copy of WUTC Standard Report for Intrastate Gas Transmission Pipelines Form D that would be used during the inspection.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | Did the inspector use an acceptable inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) Previous Question F.2 | 2 | 2 |
|          | Yes = 2 No = 0   |   |   |

### SLR Notes:

Yes, Stephanie Zuehlke used WUTC Standard Inspection Report for Intrastate Gas Transmission Pipelines Form D. She completed each section of the form as information and response was provided by the operator.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Did the inspector thoroughly document results of the inspection? Previous Question F.3 | 2 | 2 |
|          | Yes = 2 No = 0   |   |   |

### SLR Notes:

Yes, Stephanie Zuehlke documented each response and information provided to her on the standard inspection form. She asked for copies of operator's records when an area of concern was found or noted during the inspection.

- |          |   |   |    |
|----------|---|---|----|
| <b>5</b> | Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps, pyrometer, soap spray, CGI, etc.) New 2008 | 1 | NA |
|          | Yes = 1 No = 0  |   |    |

### SLR Notes:

This was a standard inspection office records review inspection. No outside field inspection was performed on July 11 & 12, 2011.

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>6</b> | What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc) New 2008 | Info Only | Info Only |
|          | Info Only = No Points   |           |           |

### SLR Notes:

WUTC inspector conducted a Standard Inspection Report for Intrastate Gas Transmission Pipelines using Form D - Records Review and Field Inspection.

- |          |  |   |                          |
|----------|--|---|--------------------------|
| <b>7</b> | Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) New 2008, comprehensive question worth 2 points total | 2 | NA                       |
|          | Yes = 2 No = 0 Needs Improvement = 1   |   |                          |
|          | a. Procedures  |   | <input type="checkbox"/> |

- |    |                             |                          |
|----|-----------------------------|--------------------------|
| b. | Records                     | <input type="checkbox"/> |
| c. | Field Activities/Facilities | <input type="checkbox"/> |
| d. | Other (Please Comment)      | <input type="checkbox"/> |

**SLR Notes:**

No field inspection was performed on July 11 7 12, 2011.

- |          |   |   |   |
|----------|---|---|---|
| <b>8</b> | Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Liaison will document reasons if unacceptable) Previous Question F.8 | 2 | 2 |
|          | Yes = 2 No = 0  |   |   |

**SLR Notes:**

Yes, Stephanie Zuehlke demonstrated excellent knowledge of the pipeline safety regulations and WUTC rules and regulations to the operator. She provided additional information on the justification of the rules and regulations when the operator requested clarification on the meaning of the rule(s).

- |          |  |   |   |
|----------|--|---|---|
| <b>9</b> | Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) Previous Question F.10 | 1 | 1 |
|          | Yes = 1 No = 0   |   |   |

**SLR Notes:**

Yes, each day at the end of the inspection review she provided a re-cap of the items found to be in non-compliance or area of concern to the Georgia Pacific company representatives. These items were noted on the inspection form each of the two days during my observation.

- |           |  |   |   |
|-----------|--|---|---|
| <b>10</b> | During the exit interview, did the inspector identify probable violations found during the inspections? Previous Question F.11 | 1 | 1 |
|           | Yes = 1 No = 0   |   |   |

**SLR Notes:**

Yes, Stephanie Zuehlke reviewed with the operator representatives the areas of concern or probable violations prior to leaving each day. She answered all questions pertaining to probable violations or areas of concerns with the citing of the regulations or WUTC rules. When asked about notification of these violations, she provided an estimated time when an official notification via certified letter would be sent to the operator from David Lyyken.

- |           |  |           |           |
|-----------|--|-----------|-----------|
| <b>11</b> | What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) | Info Only | Info Only |
|           | Info Only = No Points  |           |           |

**SLR Notes:**

This was a standard records review and no field inspection was observed during July 12 & 13, 2011.

- |           |   |           |           |
|-----------|---|-----------|-----------|
| <b>12</b> | Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) | Info Only | Info Only |
|           | Info Only = No Points   |           |           |

**SLR Notes:**

This observer noted the excellent notes and documentation performed by this Engineer in the performance of her duties and responsibilities during this inspection.

- |           |   |                          |           |
|-----------|---|--------------------------|-----------|
| <b>13</b> | Field Observation Areas Observed (check all that apply) | Info Only                | Info Only |
|           | Info Only = No Points                                   |                          |           |
|           | a. Abandonment  | <input type="checkbox"/> |           |
|           | b. Abnormal Operations                                  | <input type="checkbox"/> |           |
|           | c. Break-Out Tanks                                      | <input type="checkbox"/> |           |
|           | d. Compressor or Pump Stations                          | <input type="checkbox"/> |           |
|           | e. Change in Class Location                             | <input type="checkbox"/> |           |
|           | f. Casings  | <input type="checkbox"/> |           |
|           | g. Cathodic Protection                                  | <input type="checkbox"/> |           |
|           | h. Cast-iron Replacement                                | <input type="checkbox"/> |           |
|           | i. Damage Prevention                                    | <input type="checkbox"/> |           |
|           | j. Deactivation   | <input type="checkbox"/> |           |
|           | k. Emergency Procedures                                 | <input type="checkbox"/> |           |
|           | l. Inspection of Right-of-Way                           | <input type="checkbox"/> |           |
|           | m. Line Markers   | <input type="checkbox"/> |           |
|           | n. Liaison with Public Officials                        | <input type="checkbox"/> |           |

o.	Leak Surveys	<input type="checkbox"/>
p.	MOP	<input type="checkbox"/>
q.	MAOP	<input type="checkbox"/>
r.	Moving Pipe	<input type="checkbox"/>
s.	New Construction	<input type="checkbox"/>
t.	Navigable Waterway Crossings	<input type="checkbox"/>
u.	Odorization	<input type="checkbox"/>
v.	Overpressure Safety Devices	<input type="checkbox"/>
w.	Plastic Pipe Installation	<input type="checkbox"/>
x.	Public Education	<input type="checkbox"/>
y.	Purging	<input type="checkbox"/>
z.	Prevention of Accidental Ignition	<input type="checkbox"/>
A.	Repairs	<input type="checkbox"/>
B.	Signs	<input type="checkbox"/>
C.	Tapping	<input type="checkbox"/>
D.	Valve Maintenance	<input type="checkbox"/>
E.	Vault Maintenance	<input type="checkbox"/>
F.	Welding	<input type="checkbox"/>
G.	OQ - Operator Qualification	<input type="checkbox"/>
H.	Compliance Follow-up	<input type="checkbox"/>
I.	Atmospheric Corrosion	<input type="checkbox"/>
J.	Other	<input type="checkbox"/>

SLR Notes:

This was a standard office records review and no field inspection was observed during this site review.

**14** Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

Stephanian Zuehlke performed her duties and responsibilities in a very professional manner. She answered all questions from the operator in areas of concern pertaining to compliance with the MFSS and WUTC rules and regulations.

Total points scored for this section: 9  
Total possible points for this section: 9





## PART G - PHMSA Initiatives - Strategic Plan

Points(MAX) Score

### Risk base Inspections - Targeting High Risk Areas

- |          |   |     |     |
|----------|---|-----|-----|
| <b>1</b> | Does state have process to identify high risk inspection units?<br>Yes = 1.5 No = 0 | 1.5 | 1.5 |
|----------|---|-----|-----|

Risk Factors (criteria) to consider may include:

Miles of HCA's, Geographic area, Population Density

Length of time since last inspection

History of Individual Operator units (leakage, incident and compliance history, etc.)

Threats - (Excavation Damage, Corrosion, Natural Forces, Other Outside Forces, Material or Welds, Equipment, Operations, Other)

#### SLR Notes:

Yes, WUTC continues to maintain a GIS mapping system on the location of all pipelines in Washington State that is used in establishing their inspection reviews. WUTC assigns a risk ranking factor on each operator based on their previous inspection of the system, length of time from previously inspected and other risk factors contained in their procedures. Each operator is inspected not to excess three years or based on the risk rating established.

- |          |  |    |     |
|----------|--|----|-----|
| <b>2</b> | Are inspection units broken down appropriately? (see definitions in Guidelines)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

#### SLR Notes:

Yes, a review of their work plan indicated all units are broken down correctly and meet the suggested definition in the Guidelines for States Participating in the Pipeline Safety Program.

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>3</b> | Consideration of operators DIMP Plan? (if available and pending rulemaking)<br>Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

#### SLR Notes:

WUTC staff members are on the waiting list to attend the DIMP training in Sacramento, CA on August 23-24, 2011.

- |          |  |    |     |
|----------|--|----|-----|
| <b>4</b> | Does state inspection process target high risk areas?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

#### SLR Notes:

Yes, they review high risk areas each year in their inspection program as mentioned in their WUTC's Safety Policy and Procedures Manual.

### Use of Data to Help Drive Program Priority and Inspections

- |          |  |    |     |
|----------|--|----|-----|
| <b>5</b> | Does state use data to analyze effectiveness of damage prevention efforts in the state? (DIRT or other data, etc)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

#### SLR Notes:

Yes, this is accomplished by using their Virtual Dirt data base program. In 2013, the reporting of all damages to underground facilities will be required to be reported to WUTC by all operators and contractors due to the passage of Washington's New Underground Utility Damage Prevention Act.

- |          |   |    |     |
|----------|---|----|-----|
| <b>6</b> | Has state reviewed data on Operator Annual reports for accuracy?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

#### SLR Notes:

Yes, this is reviewed annually by staff members and prior to performing a standard inspection.

- |          |  |    |     |
|----------|--|----|-----|
| <b>7</b> | Has state analyzed annual report data for trends and operator issues?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

#### SLR Notes:

Yes, staff members perform an analysis on the annual reports for trends and operator issues prior to performing a standard inspection.

- |          |   |    |     |
|----------|---|----|-----|
| <b>8</b> | Has state reviewed data on Incident/Accident reports for accuracy?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

#### SLR Notes:

Yes, this information is reviewed and available in their data base and inspection report spreadsheet.

- 
- |                                |   |    |     |
|--------------------------------|---|----|-----|
| <b>9</b>                       | Does state do evaluation of effectiveness of program based on data? (i.e. performance measures, trends, etc.) | .5 | 0.5 |
| <small>Yes = .5 No = 0</small> |   |    |     |

**SLR Notes:**

Yes, they have the GMAP, General Management Accountability and Performance, to measure their goals and initiatives that are submitted to the WUTC Chairman and Governor annually. GMAP is the tool that helps Washington state agencies measure and improve their performance.

---

- |                                |  |    |     |
|--------------------------------|--|----|-----|
| <b>10</b>                      | Did the State input all operator qualification inspection results into web based database provided by PHMSA in a timely manner upon completion of OQ inspections? Previous Question B.15 | .5 | 0.5 |
| <small>Yes = .5 No = 0</small> |  |    |     |

**SLR Notes:**

Yes, I reviewed the OQ data base web site with Joe Subsits, Chief Pipeline Safety Engineer, and confirmed the information has been entered after each inspection was performed by a WUTC staff member. This information and requirement to enter OQ data is listed on all standard inspection forms, page 3 of 26.

---

- |                                |  |    |     |
|--------------------------------|--|----|-----|
| <b>11</b>                      | Did the State submit their replies into the Integrity Management Database (IMDB) in response to the Operators notifications for their integrity management program? Previous Question B.16 | .5 | 0.5 |
| <small>Yes = .5 No = 0</small> |  |    |     |

**SLR Notes:**

Yes, I reviewed the IMDB web site with Joe Subsits, Chief Pipeline Safety Engineer, and confirmed four inspections were performed and information has been entered after each inspection performed by a WUTC staff member. This item and requirement is listed on all standard inspection forms.

---

- |                                |   |    |     |
|--------------------------------|---|----|-----|
| <b>12</b>                      | Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17 | .5 | 0.5 |
| <small>Yes = .5 No = 0</small> |   |    |     |

**SLR Notes:**

Yes, I reviewed the IMP Data Base site and downloaded Cascade Natural Gas inspection performed on April 26, 2010 to confirm the Federal Protocol form was being used. All information was entered into the form with detailed data.

---

- |                                |   |    |     |
|--------------------------------|---|----|-----|
| <b>13</b>                      | Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns? Previous Question B.18 | .5 | 0.5 |
| <small>Yes = .5 No = 0</small> |   |    |     |

**SLR Notes:**

Yes, this is an annual reporting requirement by WUTC to all gas operators. Each operator is required to submit a description of possible defective material(s) found in any type of pipe or component used in their system. This is WAC rule 480-93-200 7(c).

---

- |                                |  |    |     |
|--------------------------------|--|----|-----|
| <b>14</b>                      | Has state confirmed transmission operators have submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submission? | .5 | 0.5 |
| <small>Yes = .5 No = 0</small> |  |    |     |

**SLR Notes:**

Yes, this information is included in WUTC Form C page 3 of 26. On February 9, 2010, WUTC has sent a notice to each operator about updates on reporting and submitting information into the National Pipeline Mapping System database.

---

## Accident/Incident Investigation Learning and Sharing Lessons Learned

- |                                |   |    |     |
|--------------------------------|---|----|-----|
| <b>15</b>                      | Has state shared lessons learned from incidents/accidents? (i.e. NAPSR meetings and communications) | .5 | 0.5 |
| <small>Yes = .5 No = 0</small> |   |    |     |

**SLR Notes:**

Yes, information is shared and discussed with NAPSR members informatively during the NAPSR Western Region meeting. A legislative fact sheet was sent to their State House and Senate members about their pipeline safety program.

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- |                                |   |    |     |
|--------------------------------|---|----|-----|
| <b>16</b>                      | Does the State support data gathering efforts concerning accidents? (Frequency/Consequence/etc) | .5 | 0.5 |
| <small>Yes = .5 No = 0</small> |   |    |     |

**SLR Notes:**

Yes, they response to PHMSA and other individual asking for information in this area. In 2013, they will be collecting additional information on damages occurring to all underground facilities in their state with the Virtual Dirt Program.

---

- |                                      |  |           |           |
|--------------------------------------|--|-----------|-----------|
| <b>17</b>                            | Does state have incident/accident criteria for conducting root cause analysis? | Info Only | Info Only |
| <small>Info Only = No Points</small> |  |           |           |

**SLR Notes:**

Yes, Joe Subsits, Scott Rukko and Al Jones have completed the root cause course at T&Q. Other WUTC staff engineers are scheduled to attend the T&Q course in 2011.

---

<b>18</b>	Does state conduct root cause analysis on incidents/accidents in state?	Info Only	Info Only
	Info Only = No Points		

SLR Notes:

Yes, they conduct a root cause analysis after each incident or accident that occurs in their state.

---

<b>19</b>	Has state participated on root cause analysis training? (can also be on wait list)	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes, Al Jones attended the PL3600 Root Cause in February 13, 2009 and Joe Subsits and Scott Rukke attended the course on April 5, 2010 in Denver, CO.

---

## Transparency - Communication with Stakeholders

<b>20</b>	Other than pipeline safety seminar does State communicate with stakeholders? (Communicate program data, pub awareness, etc.)	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes, WUTC has a web server available to all operators, general public or individuals who want to subscribe and receive or review information about their pipeline safety program. Additionally, information on their inspection history and map viewer, location of the pipeline facilities in Washington State, is available on the WUTC website.

---

<b>21</b>	Does state share enforcement data with public? (Website, newsletters, docket access, etc.)	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes, enforcement data about their inspection activities is available on WUTC's web site.

---

<b>22</b>	Part G: General Comments/Regional Observations	Info Only	Info Only
	Info Only = No Points		

SLR Notes:

No issues of concerns were found in this section of the review.

---

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



## PART H - Miscellaneous

Points(MAX) Score

- |          |   |    |     |
|----------|---|----|-----|
| <b>1</b> | What were the major accomplishments for the year being evaluated? (Describe the accomplishments, NAPSR Activities and Participation, etc.)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

### SLR Notes:

Passage of the Washington's new Underground Utility Damage Prevention Act. Governor issued a proclamation on March 25, 2010 proclaiming April, 2010 as the "Safe Digging Month" for the State of Washington. After receiving a grant from PHMSA, WUTC developed and implemented a Damage Prevention Communication Plan in an effort to reduce incidents and improve damage prevention in Washington. This was a media initiative by WUTC via radio and TV to reach the general public about safe digging practices and 811 messages. Damaged Prevention booth manned at annual Governors Industrial Safety and Health Conference. Promoted WUTC Consumer Affairs Hotline for excavators to report issues with timeliness or inaccurate locates.

- |          |  |    |     |
|----------|--|----|-----|
| <b>2</b> | What legislative or program initiatives are taking place/planned in the state, past, present, and future? (Describe initiatives (i.e. damage prevention, jurisdiction/authority, compliance/administrative, etc.)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

### SLR Notes:

WUTC was successful in getting a change in Washington's State Underground Utility Damage Prevention Act. The new law change is effect on January 1, 2013. The law requires damages to underground utilities to be reported to WUTC, establishes a Damage Prevention Account fund and enforcement procedures for WUTC to address violations involving WUTC and non-WUTC regulated entities or facilities. In 2011, WUTC will be hiring one additional engineer to add to their existing natural gas and hazardous liquid programs. This individual will work primary in the natural gas program.

- |          |  |    |     |
|----------|--|----|-----|
| <b>3</b> | Any Risk Reduction Accomplishments/Projects? (i.e. Cast iron replacement projects, bare steel, third-party damage reductions, etc.)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

### SLR Notes:

Yes, all cast iron has been removed in the State of Washington by the operators. PSE is under WUTC order on a bare steel replacement program and required to remove all material by 2014. As of December, 2009, they have 27 miles of bare pipeline to be removed in their system.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Did the state participate in/respond to surveys or information requests from NAPSR or PHMSA?<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

### SLR Notes:

Yes, they response to all PHMSA and NAPSR surveys in a timely matter. WUTC was surveyed by Federal General Accounting Office recently on the issues pertaining to jurisdictional facilities in their state and what practices are states using to help ensure the safety of PHMSA unregulated gathering pipelines.

- |          |   |    |     |
|----------|---|----|-----|
| <b>5</b> | Sharing Best Practices with Other States - (General Program)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

### SLR Notes:

WTUC staff and program manager continue to share information on reports, documents, and best practices on performing inspections with other state agencies. David Lykken has provided information to his neighboring state agencies, Oregon and Idaho, about their inspections and areas of concerns on the operators who operates in each state. This has been valuable information to each state agency in maintaining fair, balance and consistent enforcement.

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>6</b> | Part H: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

### SLR Notes:

No issues of concerns and issues in this section of the review.

Total points scored for this section: 3  
Total possible points for this section: 3

## PART I - Program Initiatives

Points(MAX) Score

### Drug and Alcohol Testing (49 CFR Part 199)

- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | Has the state verified that operators have drug and alcohol testing programs?<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

Yes, WUTC has performed and verified the operator's drug and alcohol testing since 2000. In calendar year 2010, they performed seven inspections and this item is reviewed during the standard inspection visit.

- |          |  |    |     |
|----------|--|----|-----|
| <b>2</b> | Is the state verifying that operators are conducting the drug and alcohol tests required by the operators program (random, post-incident, etc.)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes, they perform and check this item during the standard inspection performed on all operators.

- |          |   |    |     |
|----------|---|----|-----|
| <b>3</b> | Is the state verifying that any positive tests are responded to in accordance with the operator's program?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Yes, the operators are required to report this item to their agency as a reporting requirement. This requirement is found in WUTC rule WAC 480-93-200 (10). WUTC staff members also verify this item during the standard inspection review.

### Qualification of Pipeline Personnel (49 CFR Part 192 Subpart N)

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | Has the state verified that operators have a written qualification program?<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

Yes, they verified this information on their initial inspections which include construction and other types of inspections. Staff reviews the operator's abnormal operating procedures and other relative information on the OQ program.

- |          |  |    |     |
|----------|--|----|-----|
| <b>5</b> | Has the state reviewed operator qualification programs for compliance with PHMSA rules and protocols?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes, this information is verified and WUTC insures the operator's qualification program complies with PHMSA rules and protocols thru their inspection visits.

- |          |  |    |     |
|----------|--|----|-----|
| <b>6</b> | Is the state verifying that persons who perform covered tasks for the operator are qualified in accordance with the operator's program?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes, this required is checked during the standard inspection visit and is listed on their inspection form.

- |          |  |    |     |
|----------|--|----|-----|
| <b>7</b> | Is the state verifying that persons who perform covered task for the operator are requalified at the intervals specified in the operator's program?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes, during construction and field inspection visits they review the individual's covered task card to insure the person has been re-qualified at the intervals described in the operator's program. This review item is listed in their standard inspection form.

### Gas Transmission Pipeline Integrity Management (49 CFR Part 192 Subpart O)

- |          |  |   |   |
|----------|--|---|---|
| <b>8</b> | Has the state verified that all operators with transmission pipelines have either adopted an integrity management program (IMP), or have properly determined that one is not required?<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes, this information was verified by staff members by the use of the GIS mapping system. All HCA's are reviewed during inspection visits to insure the gas transmission pipeline operators have an IMP program in place

- |          |  |    |     |
|----------|--|----|-----|
| <b>9</b> | Has the state verified that in determining whether a plan is required, the operator correctly calculated the potential impact radii and properly applied the definition of a high consequence area?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

**SLR Notes:**

Yes, this was initially reviewed during the first visit with the operator. During the standard inspection visits the operator's calculations on the potential impact radii and definition of high consequence areas are reviewed and checked.

- |           |  |    |     |
|-----------|--|----|-----|
| <b>10</b> | Has the state reviewed operator IMPs for compliance with Subpart O? (In accordance with State Inspection plan)<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|-----------|--|----|-----|

**SLR Notes:**

Yes, all operators who have HCA or transmission line have been reviewed. WUTC is scheduling to perform a joint IMP inspection on Cascade Natural Gas with the State of Oregon pipeline safety personnel in 2011.

- |           |   |    |     |
|-----------|---|----|-----|
| <b>11</b> | Is the state monitoring operator progress on the inspections, tests and remedial actions required by the operator's IMP, including that they are being done in the manner and schedule called for in its IMP?<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|-----------|---|----|-----|

**SLR Notes:**

Yes, this is verified with the supplement form WTUC uses in their standard inspection visits.

- |           |   |    |     |
|-----------|---|----|-----|
| <b>12</b> | Is the state verifying that operators are periodically examining their transmission line routes for the appearance of new HCAs?<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|-----------|---|----|-----|

**SLR Notes:**

Yes, this information is checked in the field verification and GIS updates.

## Public Awareness (49 CFR Section 192.616)

- |           |   |    |     |
|-----------|---|----|-----|
| <b>13</b> | Has the state verified that each operator has developed a continuing public awareness program? (due date was 6/20/06 for most operators, 6/20/07 for certain very small operators, 6/13/08 for master meters)<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|-----------|---|----|-----|

**SLR Notes:**

Yes, these items are checked on WUTC's Records & Field Inspection Form C Intrastate Gas Distribution, Section 118 thru 125.

- |           |   |    |     |
|-----------|---|----|-----|
| <b>14</b> | Has the state reviewed the content of these programs for compliance with 192.616 (by participating in the Clearinghouse or by other means)?<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|-----------|---|----|-----|

**SLR Notes:**

Yes, these items are checked on WUTC's Records & Field Inspection Form C Intrastate Gas Distribution, Section 118 thru 125.

- |           |   |    |     |
|-----------|---|----|-----|
| <b>15</b> | Is the state verifying that operators are conducting the public awareness activities called for in its program?<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|-----------|---|----|-----|

**SLR Notes:**

Yes, this item is checked on WUTC's Records & Field Inspection Form C Intrastate Gas Distribution, Section 118 thru 125. WUTC staff is verifying the effectiveness of this program by contacting public representatives.

- |           |  |           |           |
|-----------|--|-----------|-----------|
| <b>16</b> | Is the state verifying that operators have evaluated their Public Awareness programs for effectiveness as described in RP1162?<br><small>Info Only = No Points</small> | Info Only | Info Only |
|-----------|--|-----------|-----------|

**SLR Notes:**

Yes, this item is on their check list inspection form.

- |           |  |           |           |
|-----------|--|-----------|-----------|
| <b>17</b> | Part I: General Comments/Regional Observations<br><small>Info Only = No Points</small> | Info Only | Info Only |
|-----------|--|-----------|-----------|

**SLR Notes:**

No issues or areas of concern in this section of the evaluation.

Total points scored for this section: 9  
Total possible points for this section: 9