



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

1200 New Jersey Avenue SE  
Washington DC 20590

## 2014 Gas State Program Evaluation

for

VIRGINIA STATE CORPORATION COMMISSION

### Document Legend

#### PART:

- O -- Representative Date and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- Program Performance
- D -- Compliance Activities
- E -- Incident Investigations
- F -- Damage Prevention
- G -- Field Inspections
- H -- Interstate Agent State (If Applicable)
- I -- 60106 Agreement State (If Applicable)



# 2014 Gas State Program Evaluation -- CY 2014

Gas

**State Agency:** Virginia

**Agency Status:**

**Date of Visit:** 05/11/2015 - 05/29/2015

**Agency Representative:** Massoud Tahamtani, Director of Utility & Railroad Safety

Shane Ayers, Program Manager

Drew Eaken, Senior Utilities Engineer

James Fisher, Senior Utilities Engineer

Bradley Chamberlain, Associate Safety Inspector

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

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

**Name/Title:** Mark C. Christie, Chairman

**Agency:** Virginia State Corporation Commission

**Address:** Tyler Building, P.O. Box 1197

**City/State/Zip:** Richmond, Virginia 232218

**Rating:**

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

**Interstate Agent:** Yes

## 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 2014 (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 progress report attachments provide the basis for determining the state's pipeline safety grant allocation.

## Field Inspection (PART G):

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 G, the PHMSA representative should include a written summary which thoroughly documents the inspection.

## Scoring Summary

### PARTS

### Possible Points Points Scored

A	Progress Report and Program Documentation Review
B	Program Inspection Procedures
C	Program Performance
D	Compliance Activities
E	Incident Investigations
F	Damage Prevention
G	Field Inspections
H	Interstate Agent State (If Applicable)
I	60106 Agreement State (If Applicable)

10	10
13	13
44	44
15	15
11	11
8	8
12	12
0	0
5	5

### TOTALS

**118 118**

**State Rating .....**

**100.0**

## PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

**Evaluator Notes:**

Reviewed Attachment 1 and found it correct. A review of VSCC office records indicated all inspection units match records listed in the 2014 Progress Report. No areas of concerns were found or noted. In CY2015, VSCC will be implementing a spreadsheet showing all inspection units performed and total number of days.

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | Review of Inspection Days for accuracy - Progress Report Attachment 2<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

A review of the 2014 VSCC Progress Report found the number of inspection days is based on time sheets by each inspector. Verified the Protocol 9 inspections were uploaded into the PHMSA Operator Qualification database and found no issues were found or noted.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

The number of operators and inspection units on Attachment 3 matched the office records maintained by Virginia State Corporation Commission. No issues and information is correct.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

Two incidents occurred in CY2014, Columbia Gas of Virginia and Washington Gas Light Company. Reviewed the investigation reports and found information was very informative. Columbia Gas of Virginia was issued six probable violations and a fine of \$224,000. Washington Gas Light Company incident was found to be due to a leak on the customer fuel line side and not jurisdictional to VSCC. No areas of concern.

- |          |  |   |   |
|----------|--|---|---|
| <b>5</b> | Accuracy verification of Compliance Activities - Progress Report Attachment 5<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

A review of Attachment 5, Stats on Compliance Actions, found the number of compliance actions, violations found and corrected were reported correctly. Civil penalty assessed and collected during CY2014 was \$741,000 against the following operators. Virginia Gas URS-2013-00567 \$398,000; Washington Gas Light Company URS-2014-00001 \$125,000; Roanoke Gas Company URS-2014-00002 \$36,000; Columbia Gas of Virginia URS-2014-00003 \$43,000; Virginia Gas URS-2014-00004 \$98,000; Washington Gas Light Company URS-2014-00096 \$34,000; Roanoke Gas Company URS-2014-00375 \$7,000. No issues of concern.

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Were pipeline program files well-organized and accessible? - Progress Report Attachment 6<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

**Evaluator Notes:**

Reviewed office file folders and found accessible and well-organized. Each file contained the inspection report and letter to the operator pertaining to the inspection. Records listed on Attachment 6 match documents maintained in office. No areas of concern.

- |          |  |   |   |
|----------|--|---|---|
| <b>7</b> | Was employee listing and completed training accurate and complete? - Progress Report Attachment 7<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Yes, a detailed review of employees listed on Attachment 7 was conducted and compared to the SABA training transcript. Several new employees in the Damage Prevention Section will be reallocated into the Pipeline Safety Section in CY2015-2016.

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<b>8</b>	Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8	1	1
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

VSCC has automatic adoption of federal regulations. No issues.

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<b>9</b>	List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10	1	1
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A review of Attachment 10 found planned and past performances were provided. No issues of concern.

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<b>10</b>	General Comments:	Info Only	Info Only
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Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section of the review.

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



## PART B - Program Inspection Procedures

Points(MAX) Score

- |   |  |   |   |
|---|--|---|---|
| 1 | Standard Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 2 | 2 |
|---|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

Yes, this is listed in VSCC Pipeline Safety Program Procedures on page 14, IV.2. Conducting Inspections. The procedures contain established frequencies and include a risk based method to schedule inspections. All gas operators are inspected each year and 10% of their facilities are reviewed. However, the LNG inspection is performed very three years due to the operator not using the facility. No areas of concern.

- |   |  |   |   |
|---|--|---|---|
| 2 | IMP and DIMP Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

Yes, this is listed in VSCC Pipeline Safety Program Procedures on page 9 & 13. Transmission IMP inspections are performed once every four years and field audits as necessary. DIMP inspections are performed on a three year interval. No areas of concern.

- |   |  |   |   |
|---|--|---|---|
| 3 | OQ Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

Yes, OQ inspections are performed during the standard inspection and field checks. It was suggested a separate OQ Inspection description be included in the manual. Additionally, pre-inspection and post inspection activities should be included. No concerns or loss of points occurred.

- |   |   |   |   |
|---|---|---|---|
| 4 | Damage Prevention Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|---|---|---|

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

Yes, this is listed in VSCC Pipeline Safety Program Procedures page 13. During standard inspections, the VSCC inspector will check the operator's state location ticket and field check the marking of the facilities. It was suggested a separate Damage Prevention pre and post inspection activities be listed in their procedures. No loss of points or areas of concerns were found.

- |   |  |   |   |
|---|--|---|---|
| 5 | Any operator training conducted should be outlined and appropriately documented as needed. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

Operator training is provided by staff members at the VSCC Pipeline Safety Seminar and Safety Stand Down Day. No issues.

- |   |  |   |   |
|---|--|---|---|
| 6 | Construction Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

Yes, this is listed in VSCC Pipeline Safety Program Procedures on pages 8 & 9. Operators are required to file with VSCC the

construction project daily or larger projects over \$100,000 within ten days prior to the start of the construction. No issues. It was suggested a separate construction pre and post inspection activities be listed in their procedures. No areas of concern.

- 7 Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? 6 6  
Yes = 6 No = 0 Needs Improvement = 1-5
- |  |                                      |                          |   |
|--|--------------------------------------|--------------------------|---|
| a. Length of time since last inspection (Within five year interval)  | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)   | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. Type of activity being undertaken by operators (i.e. construction)  | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc)  | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| 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) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f. Are inspection units broken down appropriately?   | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

- A. Yes, this is listed in VSCC Pipeline Safety Program Procedures on page 9.
- B. Yes, this is listed as previous year's inspection records on page 10 & 11.
- C. Yes, this is identified on page 10.
- D. Yes, this is listed on page 12.
- E. Yes, this is listed on page 10 & 11.
- F. Yes.

8 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section of the review.

Total points scored for this section: 13  
Total possible points for this section: 13



## PART C - Program Performance

Points(MAX) Score

- 1 Was ratio of Total Inspection person-days to total person days acceptable? (Director of State Programs may modify with just cause) Chapter 4.3 5 5  
Yes = 5 No = 0
- A. Total Inspection Person Days (Attachment 2):  
1156.11
- B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
220 X 9.80 = 2156.73
- Ratio: A / B  
1156.11 / 2156.73 = 0.54
- If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0  
Points = 5

### Evaluator Notes:

A.Total Inspection Person Days (Attachment 2)= 1156.11

B.Total Inspection Person Days Charged to the program(220\*Number of Inspection person years(Attachment 7)=2156.73282

Formula:- Ratio = A/B = 1156.11/2156.73282 = 0.54

Rule:- (If Ratio >=.38 then points = 5 else Points = 0.)

Thus Point Award is 5

- 2 Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines Appendix C for requirements) Chapter 4.4 5 5  
Yes = 5 No = 0 Needs Improvement = 1-4
- a. Completion of Required OQ Training before conducting inspection as lead? Yes ☒ No ☐ Needs Improvement ☐
- b. Completion of Required DIMP\*/IMP Training before conducting inspection as lead? \*Effective Evaluation CY2013 Yes ☒ No ☐ Needs Improvement ☐
- c. Root Cause Training by at least one inspector/program manager Yes ☒ No ☐ Needs Improvement ☐
- d. Note any outside training completed Yes ☒ No ☐ Needs Improvement ☐
- e. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector. Yes ☒ No ☐ Needs Improvement ☐

### Evaluator Notes:

A review of TQ transcript records indicate inspectors have completed Web Based Training Courses and OQ before attending classes in CY2014. Drew Eaken is the lead on DIMP and Jim Fisher is the lead inspector for IMP. Four inspectors have completed the Root Cause course. VSCC continues to provide in-house training to all new inspectors prior to attending TQ. No issues.

- 3 Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1 2 2  
Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

Yes, Massoud Tahamtani, Director,has extensive knowledge of Virginia's rules and regulations and the pipeline safety regulations. No issues.

- 4 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 2 NA  
Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

No response was required in the letter send to Chairman James Dimitri dated June 26 2014.

- 5 Did State hold PHMSA TQ Seminar in Past 3 Years? Chapter 8.5 2 2  
Yes = 2 No = 0

Evaluator Notes:

Yes, VSCC held a TQ seminar on September 30 - October 2, 2014 in Virginia Beach, VA at the Hilton Hotel. The total number of attendees was 315. No issues.

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- |          |  |   |   |
|----------|--|---|---|
| <b>6</b> | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1<br>Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|----------|--|---|---|

Evaluator Notes:

Yes, a review of inspection reports, files and VSCC PIPES data base confirm all operators were inspected in accordance to VSCC written procedures. In this regard, all distribution systems are inspected annually, LNG facilities every three years and twenty percent of the master meters are inspected annually. No issues.

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- |          |  |   |   |
|----------|--|---|---|
| <b>7</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

Yes, VSCC inspectors use the federal inspection forms to perform all inspections. The form and information is uploaded into the PIPES data base as an attachment. No issues.

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- |          |   |   |   |
|----------|---|---|---|
| <b>8</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) Chapter 5.1<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Yes, VSCC includes this question along with four others on NTSB in each of the inspections performed on their operators. A review of the inspections performed on Columbia Gas of Virginia and Southwest Virginia Gas Company City indicate this item was reviewed with the operator. No issues.

- 
- |          |  |   |   |
|----------|--|---|---|
| <b>9</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) Chapter 5.1<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Yes, VSCC includes this question along with four others on NTSB in each of the inspections performed on their operators. A review of the inspections performed on Columbia Gas of Virginia and Southwest Virginia Gas Company City indicate this item was reviewed with the operator. No issues.

- 
- |           |   |   |   |
|-----------|---|---|---|
| <b>10</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) Chapter 5.1<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes, VSCC includes this question along with four others on NTSB in each of the inspections performed on their operators. A review of the inspections performed on Columbia Gas of Virginia and Southwest Virginia Gas Company City indicate this item was reviewed with the operator. No issues.

- 
- |           |  |   |   |
|-----------|--|---|---|
| <b>11</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? Chapter 5.1<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

Yes, a review of inspection reports performed on operators indicated this item was reviewed. No areas



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

Evaluator Notes:

Yes. VSCC staff members continue to review the operator's annual reports and record the results in PIPES data base. This information is used in the risk ranking inspection model for inspections to be performed each year.

- 13 Did state input all applicable OQ, IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, a review of the OQDB web site indicated four OQ inspection results were unloaded into the federal database in a timely manner. All OQ inspections were performed on Columbia Gas of Virginia. A review of PHMSA IMP Data base found final results of the four IMP inspections performed on the following companies Columbia Gas of Virginia 10/28/2013, Virginia Gas 07/11/2013, Roanoke Gas Company 11/20/2013, Washington Gas Light Company 09/17/2013 was correctly entered in CY2014. No issues.

- 14 Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission? 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, this item is listed on the federal form 1- Transmission Line Inspection on page 3. No issues of concern.

- 15 Is the state verifying operators are conducting drug and alcohol tests as required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, during VSCC field inspections they verify the operator is conducting this requirement. They use PHMSA Federal form 13 and include a copy of the company's USDOT Drug & Alcohol Testing MIS Data Collection document. A review of an inspection of City of Richmond on 11-05-14 confirm this item was performed.

- 16 Is state verifying operators OQ programs are up to date? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals determined in the operators plan. 49 CFR 192 Part N 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, this is performed by the inspector during field or office inspections.

- 17 Is state verifying operator's gas transmission integrity management programs (IMP) are up to date? This should include a previous review of IMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart 0 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, this is checked on Gas Integrity Management Protocols and discussed with the operator during the inspection. Additionally, any updated information on the operator's plan is logged into their network drive at VSCC.

- 18 Is state verifying operator's gas distribution integrity management Programs (DIMP)? This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart P DIMP ? First round of program inspections should be complete by December 2014 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, eight gas distribution integrity management inspections were performed in CY2014. During the inspection all DIMP plans were reviewed and monitored. Additionally, any updated information found or provided about the DIMP plan by the operator was logged into VSCC network drive for future reference.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>19</b> | Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. 49 CFR 192.616 (I13-16) PAPEI Effectiveness Inspections should have been completed by December 2013<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

Yes, VSCC inspectors verified and completed all public awareness inspections before the due date of December, 2013. No issues.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>20</b> | 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).<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

Yes, this is accomplished by quarterly meetings with company officials, notices on alert issues via the Virginia Gas Operators Association and VSCC website.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>21</b> | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

One safety related condition report was reported in CY2014. The SRC was on Danville Utilities pertaining to a 12 coated steel pipe over the Dan River carried by the Aiken Bridge. The pipeline was replaced and back in service on July 1, 2014.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>22</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?<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes, this is addressed in the DIMP plan and reviewed in leak records submitted by the operator.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>23</b> | Did the state participate in/respond to surveys or information requests from NAPSRS or PHMSA?<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

Yes, a review of email correspondence confirm Robert Clarillos, NAPSRS Administrative Manager, requested information about cast iron from VSCC on August 26, 2014. VSCC provided the requested information.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>24</b> | 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.(New Question for CY2013, no points until CY2015 evaluation conducted in CY2016)<br>Info Only = No Points | 0 | 0 |
|-----------|--|---|---|

Evaluator Notes:

A review of special permits and waivers found two were issued by VSCC. It was determined the waiver issued on December 17, 1993 Case no. PUE930068 has expired as of April 1, 1995. Advised Program Manager to provided a letter to John Gale, PHMSA Compliance officer, requesting the waiver document be removed from PHMSA Website.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>25</b> | Did the state attend the National NAPSRS Board of Directors Meeting in CY being evaluated? (New Question for CY2014, no points first year)<br>Info Only = No Points | 0 | 0 |
|-----------|---|---|---|

Evaluator Notes:

Yes, Massoud Tahamtani attended the 2014 NAPSRS Board of Director's meeting in Springfield, IL.

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26	Discussion on State Program Performance Metrics found on Stakeholder Communication site. (question will be rolled up and included as part of Question C12 on future evaluations) <a href="http://primis.phmsa.dot.gov/comm/states.htm">http://primis.phmsa.dot.gov/comm/states.htm</a> Info Only = No Points	0	0
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Evaluator Notes:

Yes, discussed with VSCC staff information about the website and information on performance metrics to improve their program. No issues.

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

Evaluator Notes:

No loss of points occurred in this section of the review.

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Total points scored for this section: 44  
Total possible points for this section: 44



## PART D - Compliance Activities

Points(MAX) Score

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1<br>Yes = 4 No = 0 Needs Improvement = 1-3 | 4   | 4                                       |
| a.       | Procedures to notify an operator (company officer) when a noncompliance is identified  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b.       | Procedures to routinely review progress of compliance actions to prevent delays or breakdowns  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

### Evaluator Notes:

- a. This is located in VSCC Pipeline Safety Procedure Appendix 7, PIPELINE SAFETY ENFORCEMENT PROCEDURES FOR JURISDICTIONAL OPERATORS, page 35-36. Notification is sent to company compliance representative or officer as described on page 36.
- b. Procedures to routinely review compliance action is listed on page 17, Follow-up Inspection. "Follow up reviews to determine compliance with the Commission's Orders is performed by the Office Manager to ensure operators' perform the required tasks detailed as part of remedial measures in the Orders".

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | 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<br>Yes = 4 No = 0 Needs Improvement = 1-3 | 4   | 4                                       |
| a.       | Were compliance actions sent to company officer or manager/board member if municipal/government system?  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b.       | Were probable violations documented?   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c.       | Were probable violations resolved?   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d.       | Was the progress of probable violations routinely reviewed?  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

### Evaluator Notes:

- a. A review of compliance action documents found a letter sent to Dan Cote, Vice President with Columbia Gas of Virginia dated January 16, 2014. Other reviews of compliance action documents confirm all letters are being sent to the company officer or manager. No issues.
- b. Yes, a check of files found probable violations were documented correctly for several operators cited during CY2014. In this regard, a review of the inspection reports for Columbia Gas of Virginia Case number URS-2014-0003 demonstrated violations were documented.
- c. Yes, probable violations were resolved by company action to pay the civil penalty of \$43,000 dated 02-12-14.
- d. Yes, this is routinely reviewed during monthly staff meetings.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | Did the state issue compliance actions for all probable violations discovered?<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

### Evaluator Notes:

Yes, a review of VSCC files and progress report indicated 63 probable violations were cited against operators for non-compliance. This information was recorded on attachment 5 of the progress report. No issues.

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary.<br>Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

### Evaluator Notes:

Yes, this process is described in VSCC Pipeline Safety Procedures Manual, pages 38 & 39. In addition, this item is mentioned in the letter to the operator. No issues.

- |          |   |   |   |
|----------|---|---|---|
| <b>5</b> | 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)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

### Evaluator Notes:

Yes, Program Manager and staff members are familiar with imposing civil penalties. CY2014, VSCC assessed and collected \$741,000.00 from four operators.

---

6	Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations? Yes = 1 No = 0 Needs Improvement = .5	1	1
---	---	---	---

Evaluator Notes:

Yes, CY2014, VSCC assessed and collected \$741,000.00 from four operators.

---

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

Evaluator Notes:

No loss of points occurred in this section of the review.

---

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



## PART E - Incident Investigations

Points(MAX) Score

- 1 Does the state have written procedures to address state actions in the event of an incident/accident? 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

This item is listed and located on page 43, of VA SCC Pipeline Safety Procedure Manual, Incident Investigation Procedures.  
No issues.

- 2 Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? And did state keep adequate records of Incident/Accident notifications received? Chapter 6 2 2  
Yes = 2 No = 0 Needs Improvement = 1

- a. Acknowledgement of MOU between NTSB and PHMSA (Appendix D) Yes ☒ No ☐ Needs Improvement ☐  
b. Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E) Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

a & b: This item is listed and located on pages 44-45, of VSCC Pipeline Safety Procedure Manual, On-Site Investigation.

- 3 If onsite investigation was not made, did state obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

This item is listed and located on page 44, of VSCC Pipeline Safety Procedure Manual which state, On-Site Investigation.

- 4 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? 3 3  
Yes = 3 No = 0 Needs Improvement = 1-2
- a. Observations and document review Yes ☒ No ☐ Needs Improvement ☐  
b. Contributing Factors Yes ☒ No ☐ Needs Improvement ☐  
c. Recommendations to prevent recurrences when appropriate Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

Yes, a review of the two incidents that occurred in CY2014, Columbia Gas of Virginia and Washington Gas Company, clearly support observations and contributing factors were well documented. Additionally, Columbia Gas of Virginia was cited for probable violations and assessed a civil penalty.

- 5 Did the state initiate compliance action for violations found during any incident/accident investigation? 1 1  
Yes = 1 No = 0

Evaluator Notes:

Yes, Columbia Gas of Virginia was cited for probable violations and assessed a civil penalty in the amount of \$224,000.

- 6 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 report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, PHMSA Eastern Region is notified of all information and reports pertaining to incidents including final reports.

- 7 Does state share lessons learned from incidents/accidents? (sharing information, such as: at NAPSR Region meetings, state seminars, etc) 1 1

Yes = 1 No = 0

Evaluator Notes:

Yes, this is discussed at the TQ Seminars, monthly Damage Prevention Advisory Committee meetings and NAPSR Eastern Region Meeting.

---

**8** General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section of the review.

---

Total points scored for this section: 11  
Total possible points for this section: 11



## PART F - Damage Prevention

Points(MAX) Score

- |   |  |   |   |
|---|--|---|---|
| 1 | 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? NTSB<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, VSCC includes this question along with four others on NTSB in each of the inspections performed on their operators. A review of several inspections performed in CY2014 found this document was checked and reviewed with the operator. No issues.

- |   |   |   |   |
|---|---|---|---|
| 2 | 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?<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Yes, VSCC uses the Standard Inspection Form 2 which includes a question on this item on page 5 of 30. A check on this item found the inspection performed on Atmos Energy Corporation dated May 12, 2014 and Roanoke Gas Company, dated December 8, 2014 confirmed this item was checked. No issues.

- |   |  |   |   |
|---|--|---|---|
| 3 | Did the state encourage and promote practices for reducing damages to all underground facilities to its regulated companies? (i.e. such as promoting/adopting the CGA Best Practices encouraging adoption of the 9 Elements, etc.)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, VSCC has adopted the CGA Best Practices and continues to provide information to all stakeholders about marking their facilities, hand digging and directional drilling.

- |   |  |   |   |
|---|--|---|---|
| 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? (This can include DIRT and other data shared and reviewed by the pipeline safety program)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, VSCC continues to maintain a database on the number of pipeline damages that are reported by the operator to their agency. In CY 2014 the gas damages per 1,000 gas tickets was 1.35. This is slight increased from the previous year due to locators' failure to locate facilities pertaining to renewal replacements of mains and sewer lines.

- |   |  |           |           |
|---|--|-----------|-----------|
| 5 | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

No loss of points occurred in this section of the review.

Total points scored for this section: 8  
Total possible points for this section: 8



## PART G - Field Inspections

Points(MAX) Score

- 1 Operator, Inspector, Location, Date and PHMSA Representative Info OnlyInfo Only  
Info Only = No Points

Name of Operator Inspected:

City of Richmond Department of Public Utilities/Columbia Gas of Virginia

Name of State Inspector(s) Observed:

Drew Eaken, Senior Utilities Engineer, Shane Ayers, Program Manager & Bradley Chamberlain, Associate Safety Inspector

Location of Inspection:

Richmond, VA and surrounding areas

Date of Inspection:

May 26 & 27, 2015

Name of PHMSA Representative:

Glynn Blanton, PHMSA State Programs

### Evaluator Notes:

Field inspections consisted of several cast iron replacement and new service line installation construction projects by City of Richmond.

The following six locations were visited on May 26th: 1) Fairmount Avenue & N. 23 St., Installation of a new 4 " PE high density pipe by Henkel & McCoy (H&M). James, Ashlock, H&M crew foreman 2.) Jeff Davis Highway & Congress Road. Construction was performed on Congress Road pertaining to installation of new 2" PE3408. Doug Howard, Wilbros T&D Services. 3.) 5207 Forest Hill Avenue. This project involved the installation of a new service line to replace the existing cast iron. Contact person was, Mike Luck Wilbros T&D Services. 4.) 5116 King William Road. This was a new service line installation. Contact person was, William Newman, Wilbros T&D Services 5.) 4907 Turner Ridge Court. Lot 11. Installation of new service line could not be performed due to an apparent mismark of the utilities in the subdivision. City construction crews requested a remark of the area. Contact person was, Joseph Holmes, Wilbros T&D Services foreman. 6.) Raintree Drive. Construction and tie in of a 20 foot section of main in the middle of the street. Contact person was Leonard Bey, H&M foreman. No violations were found but the mismark of utilities at the Turner Ridge Court is a state damage prevention violation.

The second day field inspection was a review of two new construction projects for Columbia Gas of Virginia. The locations of the projects were: 1.) Walnut Cove in Magnolia Green subdivision lot 61, 16831 White Daisey Loop, Moseley, VA. This writer observed David Nealey performing a fusion on PE D2513 service line. 2.) 13341 Olde Stonegate Road, lot 2 in Midlothian, VA. This writer observed installation of new service line, 1" CTS, D2513 PE pipe dated 12-15-14 along driveway to new home. Miller Pipeline Company was performing the work. No violations were found or noted.

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

### Evaluator Notes:

Yes, City of Richmond & Columbia Gas of Virginia were notified by email and telephone call on May 14, 2015.

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

### Evaluator Notes:

Yes, Drew Eaken & Bradley Chamberlin used the correct VSCC form and recorded their finding in PIPES. Additionally, location of the construction site project and state locate ticket number was entered in their daily log book.

- 4 Did the inspector thoroughly document results of the inspection? 2 2  
Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

Yes. This writer observed detailed information about each project being recorded by Drew Eaken & Bradley Chamberlin in their field books.

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

Evaluator Notes:

Yes observed Drew Eaken & Bradley Chamberlin checking the operator's construction crew equipment to see if it was calibrated correctly and following company guidelines.

---

- |   |  |   |                                     |
|---|--|---|-------------------------------------|
| 6 | Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2                                   |
|   | a. Procedures  |   | <input type="checkbox"/>            |
|   | b. Records   |   | <input type="checkbox"/>            |
|   | c. Field Activities  |   | <input checked="" type="checkbox"/> |
|   | d. Other (please comment)  |   | <input type="checkbox"/>            |

Evaluator Notes:

Yes, Drew Eaken & Bradley Chamberlin were very thorough in their review of the construction projects checking all locate tickets and other relative information.

---

- |   |   |   |   |
|---|---|---|---|
| 7 | Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Drew Eaken has completed all Gas courses at TQ and over 16 years of experience in pipeline safety. Bradley Chamberlin has completed three of the seven required courses at TQ and has more than five years of experience.

---

- |   |   |   |   |
|---|---|---|---|
| 8 | 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)<br>Yes = 1 No = 0 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

Yes, Drew Eaken & Bradley Chamberlin both conducted an exit interview at each construction site.

---

- |   |   |   |   |
|---|---|---|---|
| 9 | During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable)<br>Yes = 1 No = 0 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

No violations were found at each of the construction sites.

---

- |    |   |           |                                     |
|----|---|-----------|-------------------------------------|
| 10 | General Comments: 1) What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) 2) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) 3) Other.<br>Info Only = No Points | Info Only | Info Only                           |
|    | 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 checked="" 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 checked="" 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 checked="" type="checkbox"/> |
| x. | Public Education                  | <input type="checkbox"/>            |
| y. | Purging                           | <input type="checkbox"/>            |
| z. | Prevention of Accidental Ignition | <input checked="" type="checkbox"/> |
| A. | Repairs                           | <input type="checkbox"/>            |
| B. | Signs                             | <input type="checkbox"/>            |
| C. | Tapping                           | <input checked="" 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"/>            |

Evaluator Notes:

See Evaluator notes in question G.1 for details of items observed.

---

Total points scored for this section: 12  
Total possible points for this section: 12



**PART H - Interstate Agent State (If Applicable)****Points(MAX)    Score**

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

- |          |  |   |    |
|----------|--|---|----|
| <b>3</b> | Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form?<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

NA

- |          |   |   |    |
|----------|---|---|----|
| <b>4</b> | Were 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.)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

NA

- |          |   |   |    |
|----------|---|---|----|
| <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?<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

NA

- |          |  |   |    |
|----------|--|---|----|
| <b>6</b> | Did the state give written notice to PHMSA within 60 days of all probable violations found?<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

**PART I - 60106 Agreement State (If Applicable)****Points(MAX)    Score**

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

**Evaluator Notes:**

Yes, a review of inspection performed on City of Danville, City of Richmond, City of Charlottesville and Industrial Development of Authority of Carroll County show the Federal Inspection form was used for each. No issues.

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | Are results documented demonstrating inspection units were reviewed in accordance with state inspection plan?<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

Yes, a review of PHMSA Eastern Region 2014 Plan Tracking Sheet inspection list show each municipal gas operator to be inspected. VSCC performed the inspections and met requirements in providing the reports to PHMSA Eastern Region. No issues.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | Were any probable violations identified by state referred to PHMSA for compliance?<br>(NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

Yes, VSCC found three probable violation packages against the City of Richmond and one probable violation against City of Danville that were referred to the PHMSA Eastern Region for action. The probable violations were corrected by the operators at a later day.

- |          |   |   |    |
|----------|---|---|----|
| <b>4</b> | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment?<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

**Evaluator Notes:**

NA. No condition of imminent safety hazard occurred in CY2014.

- |          |  |   |   |
|----------|--|---|---|
| <b>5</b> | Did the state give written notice to PHMSA within 60 days of all probable violations found?<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

Yes, a review of the files for City of Richmond and City of Danville found VSCC provided all supporting documentation to PHMSA Eastern Region within 60 days. No issues.

- |          |  |   |   |
|----------|--|---|---|
| <b>6</b> | Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations?<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

Yes, a review of file folder for the City of Richmond and City of Danville indicated adequate documentation was provided. No issues.

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>7</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

**Evaluator Notes:**

No loss of points occurred in this section of the review.

Total points scored for this section: 5  
Total possible points for this section: 5