

2015 Gas State Program Evaluation

for

Washington Utilities and Transportation 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)



2015 Gas State Program Evaluation -- CY 2015

Gas

State Agency: Washington Agency Status: Date of Visit: Agency Representative: PHMSA Representative: Commission Chairman to whom follow up letter is to be	Rating: 60105(a):	60106(a):	Interstate Agent:
Name/Title:			
Agency: Address: City/State/Zip:			

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 2015 (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 then 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 <u>written summary</u> which thoroughly documents the inspection.

Scoring Summary

PARTS		Possible Points Points Scored
А	Progress Report and Program Documentation Review	10
В	Program Inspection Procedures	13
С	Program Performance	47
D	Compliance Activities	15
Е	Incident Investigations	11
F	Damage Prevention	8
G	Field Inspections	12
Н	Interstate Agent State (If Applicable)	6
Ι	60106 Agreement State (If Applicable)	0
TOTA	LS	122
State F	lating	

Points(MAX) Score
ess 1
1
ress 1
gress 1
1
2
eport 1
1

...

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

10 General Comments: Info Only = No Points Evaluator Notes: Info Only

1 Standard Inspection procedures should give guidance to state inspectors that insure 2 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. Yes = 2 No = 0 Needs Improvement = 1Evaluator Notes: 2 IMP and DIMP Inspection procedures should give guidance to state inspectors that insure 1 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. Yes = 1 No = 0 Needs Improvement = .5**Evaluator Notes:** 3 OQ Inspection procedures should give guidance to state inspectors that insure 1 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. Yes = 1 No = 0 Needs Improvement = .5Evaluator Notes: 4 Damage Prevention Inspection procedures should give guidance to state inspectors that 1 insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, postinspection activities. Yes = 1 No = 0 Needs Improvement = .5 Evaluator Notes: 5 Any operator training conducted should be outlined and appropriately documented as 1 needed. Yes = 1 No = 0 Needs Improvement = .5Evaluator Notes: 6 Construction Inspection procedures should give guidance to state inspectors that insure 1 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 Yes = 1 No = 0 Needs Improvement = .5**Evaluator Notes:** 7 Does inspection plan address inspection priorities of each operator, and if necessary each 6 unit, based on the following elements? Yes = 6 No = 0 Needs Improvement = 1-5Needs Length of time since last inspection (Within five year interval) a. Yes \bigcirc No () Improvement Operating history of operator/unit and/or location (includes leakage, incident and b. Needs Yes () No () Improvement O compliance activities)

c. Type of activity being undertaken by operators (i.e. construction)	Yes 🔿	No 🔿	Needs Improvement
d. Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc)	Yes 🔿		Needs Improvement
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 🔿	No 🔿	Needs Improvement
f. Are inspection units broken down appropriately?	Yes 🔿	No 🔿	Needs Improvement
Evaluator Notes:			

8 General Comments: Info Only = No Points Evaluator Notes: Info Only

 Was ratio of Total Inspection person-days to total person days acceptable? (Director of State Programs may modify with just cause) Chapter 4.3 Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):

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

Ratio: A / B

If Ratio ≥ 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0

Evaluator Notes:

2	Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines Appendix C for requirements) Chapter 4.4	5		
	Yes = 5 No = 0 Needs Improvement = 1-4 a. Completion of Required OQ Training before conducting inspection as lead?	Yes ()	No 🔿	Needs
	 b. Completion of Required DIMP*/IMP Training before conducting inspection as lead? *Effective Evaluation CY2013 	Yes 🔿		Improvement O Needs Improvement O
	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
Evaluato	e. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector. r Notes:	Yes 🔿	No 🔿	Needs Improvement
3 Evaluato	Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1 Yes = 2 No = 0 Needs Improvement = 1 r Notes:	2		
4 Evaluato	Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1 Yes = 2 No = 0 Needs Improvement = 1 r Notes:	2		
5 Evaluato	Did State hold PHMSA TQ Seminar in Past 3 Years? Chapter 8.5 Yes = 2 No = 0 r Notes:	2		
6	Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1 Yes = $5 \text{ No} = 0 \text{ Needs Improvement} = 1-4$	5		

Evaluator Notes:

7	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	2
Evaluato	Yes = 2 No = 0 Needs Improvement = 1 or Notes:	
8	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 Yes = $1 \text{ No} = 0$	1
Evaluato		
9	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 Yes = $1 \text{ No} = 0$	1
Evaluato	r Notes:	
10	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 Yes = 1 No = 0	1
Evaluato		
11	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 $Yes = 1 No = 0$	1
Evaluato		
12	Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues? Yes = $2 \text{ No} = 0 \text{ Needs Improvement} = 1$	2
Evaluato		
13	Did state input all applicable OQ, DIMP/IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1 Yes = $2 \text{ No} = 0 \text{ Needs Improvement} = 1$	2
Evaluato	r Notes:	
14	Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission?	1

- 15 Is the state verifying operators are conducting drug and alcohol tests as required by 2 regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199 Yes = 2 No = 0 Needs Improvement = 1Evaluator Notes: 16 Is state verifying operators OQ programs are up to date? This should include verification 2 of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and regualified at intervals determined in the operators plan. 49 CFR 192 Part N Yes = 2 No = 0 Needs Improvement = 1Evaluator Notes: 17 Is state verifying operator's gas transmission integrity management programs (IMP) are 2 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 Yes = 2 No = 0 Needs Improvement = 1Evaluator Notes: 18 2 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 have been complete by December 2014 Yes = 2 No = 0 Needs Improvement = 1**Evaluator Notes:** 19 Is state verifying operators Public Awareness programs are up to date and being 2 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 be conducted every four years per RP1162 Yes = 2 No = 0 Needs Improvement = 1Evaluator Notes: 20 Does the state have a mechanism for communicating with stakeholders - other than state 1 pipeline safety seminar? (This should include making enforcement cases available to public). Yes = 1 No = 0 Needs Improvement = .5Evaluator Notes:
 - 21 Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 Yes = 1 No = 0 Needs Improvement = .5

22	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? Yes = 1 No = 0 Needs Improvement = .5	1		
Evaluato	or Notes:			
23	Did the state participate in/respond to surveys or information requests from NAPSR or PHMSA? Yes = 1 No = 0 Needs Improvement = .5	1		
Evaluato	or Notes:			
24	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. No = 0 Needs Improvement = .5 Yes = 1	1		
Evaluato	or Notes:			
25	Did the state attend the National NAPSR Board of Directors Meeting in CY being evaluated? No = 0 Needs Improvement = .5 Yes = 1	1		
Evaluato	or Notes:			
26	Discussion on State Program Performance Metrics found on Stakeholder Communication site - http://primis.phmsa.dot.gov/comm/states.htm No = 0 Needs Improvement = 1 Yes = 2	2		
	a. Discussion of Potential Accelerated Actions (AA's) based on any negative trends	Yes 🔿	No 🔿	Needs Improvement
	b. NTSB P-11-20 Meaningful Metrics	Yes 🔿	No 🔿	Needs Improvement
Evaluato	or Notes:			
27		Info On	ly	
Evaluate	Info Only = No Points or Notes:			

1	Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1 $Yes = 4 No = 0$ Needs Improvement = 1-3	4		
	a. Procedures to notify an operator (company officer) when a noncompliance is identified	Yes 🔿	No 🔿	Needs Improvement
Evaluat	 b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns brotes: 	Yes 🔿	No 🔿	Needs Improvement
2	Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1 Yes = $4 \text{ No} = 0 \text{ Needs Improvement} = 1-3$	y 4		
	a. Were compliance actions sent to company officer or manager/board member if municipal/government system?	Yes 🔿	No 🔿	Needs Improvement
	b. Document probable violations	Yes ()	No 🔿	Needs Improvement
	c. Resolve probable violations	Yes 🔿	No 🔿	Needs Improvement
	d. Routinely review progress of probable violations	Yes 🔿	No 🔿	Needs Improvement
	e. Were applicable civil penalties outlined in correspondence with operator(s)	Yes 🔿	No 🔿	Needs Improvement
Evaluat	or Notes:			improvement
3 Evaluate	Did the state issue compliance actions for all probable violations discovered? Yes = 2 No = 0 Needs Improvement = 1 or Notes:	2		
4	Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary. Yes = 2 No = 0	2		
Evaluat	or Notes:			
5	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) Yes = $2 \text{ No} = 0$ Needs Improvement = 1	2		
Evaluat	or Notes:			
6	Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations? Yes = 1 No = 0 Needs Improvement = .5	y 1		
Evaluat	or Notes:			
7	General Comments:	Info Onl	y	



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

Evaluator Notes:

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 Yes = 2 No = 0 Needs Improvement = 1	2		
	a. Acknowledgement of MOU between NTSB and PHMSA (Appendix D)	Yes 🔿	No 🔿	Needs Improvement
Evaluato	 b. Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E) or Notes: 	Yes 🔿	No 🔿	Needs Improvement
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 Yes = $1 \text{ No} = 0 \text{ Needs Improvement} = .5$	1		
Evaluato	or Notes:			
4	Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? Yes = 3 No = 0 Needs Improvement = 1-2	3		
	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
Evaluato	or Notes:			mprovement
5	Did the state initiate compliance action for violations found during any incident/accident investigation? Yes = $1 \text{ No} = 0$	1		
Evaluato	or Notes:			
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 Yes = $1 \text{ No} = 0 \text{ Needs Improvement = .5}$	1		
Evaluato	or Notes:			
7	Does state share lessons learned from incidents/accidents? (sharing information, such as: at NAPSR Region meetings, state seminars, etc) Yes = 1 No = 0	1		
Evaluato	or Notes:			

8 General Comments: Info Only = No Points Evaluator Notes: Info Only

Total possible points for this section: 11



DUNS: 088967570 2015 Gas State Program Evaluation

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 $Yes = 2 No = 0$ Needs Improvement = 1	2
Evaluator	Notes:	
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? Yes = $2 \text{ No} = 0 \text{ Needs Improvement} = 1$	2
Evaluator	Notes:	
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.) Yes = $2 \text{ No} = 0 \text{ Needs Improvement} = 1$	2
Evaluator		
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) $Yes = 2 No = 0$ Needs Improvement = 1	2
Evaluator	Notes:	
5	General Comments: Info Only = No Points	Info Only
Evaluator	Notes:	

1	Operator, Inspector, Location, Date and PHMSA Representative Info Only = No Points	Info Only
	Name of Operator Inspected:	
	Name of State Inspector(s) Observed:	
	Location of Inspection:	
	Date of Inspection:	
	Name of PHMSA Representative:	
Evaluato	or Notes:	
2	Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? Yes = 1 No = 0	1
Evaluato	or Notes:	
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) Yes = $2 \text{ No} = 0$ Needs Improvement = 1	2
Evaluato		
4	Did the inspector thoroughly document results of the inspection? Yes = 2 No = 0 Needs Improvement = 1	2
Evaluato	or Notes:	
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.) Yes = 1 No = 0	1
Evaluato		
6	Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) Yes = $2 \text{ No} = 0 \text{ Needs Improvement} = 1$	2
	a. Procedures	
	b. Recordsc. Field Activities	
	d. Other (please comment)	
Evaluato	or Notes:	
7	Did the inspector have adequate knowledge of the pipeline safety program and	2

- Did the inspector conduct an exit interview? (If inspection is not totally complete the 8 1 interview should be based on areas covered during time of field evaluation) Yes = 1 No = 0Evaluator Notes: 9 During the exit interview, did the inspector identify probable violations found during the 1 inspections? (if applicable) Yes = 1 No = 0**Evaluator Notes:** 10 General Comments: 1) What did the inspector observe in the field? (Narrative Info Only 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. Info Only = No Points a. Abandonment \square Abnormal Operations b. Break-Out Tanks c. d. Compressor or Pump Stations Change in Class Location e. f. Casings **Cathodic Protection** g. Cast-iron Replacement h. i. **Damage Prevention** j. Deactivation k. **Emergency Procedures** 1. Inspection of Right-of-Way m. Line Markers n. Liaison with Public Officials Leak Surveys \square 0. p. MOP MAOP q. r. Moving Pipe s. New Construction Navigable Waterway Crossings t. Odorization u. v. **Overpressure Safety Devices** Plastic Pipe Installation W. Х. **Public Education** Purging y. Prevention of Accidental Ignition Z. A. Repairs Β. Signs С. Tapping \square
 - D. Valve Maintenance
 - E. Vault Maintenance

- F. Welding
- G. OQ Operator Qualification
- H. Compliance Follow-up
- I. Atmospheric Corrosion
- J. Other

Evaluator Notes:

1	Did the state use the current federal inspection form(s)? Yes = $1 \text{ No} = 0 \text{ Needs Improvement} = .5$	1
Evaluato	•	
2	Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? Yes = 1 No = 0 Needs Improvement = .5	. 1
Evaluato	•	
3	Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? Yes = $1 \text{ No} = 0 \text{ Needs Improvement} = .5$: 1
Evaluato	r Notes:	
4	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.) Yes = $1 \text{ No} = 0 \text{ Needs Improvement} = .5$	1
Evaluato		
5 Evaluato	Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Yes = $1 \text{ No} = 0 \text{ Needs Improvement} = .5$ r Notes:	1
6	Did the state give written notice to PHMSA within 60 days of all probable violations found? Yes = $1 \text{ No} = 0 \text{ Needs Improvement} = .5$	1
Evaluato	r Notes:	
7	Did the state initially submit documentation to support compliance action by PHMSA on probable violations? Yes = $1 \text{ No} = 0 \text{ Needs Improvement} = .5$	1
Evaluato	•	
8	General Comments:	Info Only
Evaluato	Info Only = No Points r Notes:	
	Total possible p	oints for this section: 6

1 Evaluator	Did the state use the current federal inspection form(s)? Yes = 1 No = 0 Needs Improvement = .5 Notes:	1
2 Evaluator	Are results documented demonstrating inspection units were reviewed in accordance with state inspection plan? Yes = 1 No = 0 Needs Improvement = .5 Notes:	n 1
3 Evaluator	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.) Yes = $1 \text{ No} = 0 \text{ Needs Improvement} = .5$ Notes:	1
4 Evaluator	Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Yes = $1 \text{ No} = 0 \text{ Needs Improvement} = .5$ Notes:	1
5 Evaluator	Did the state give written notice to PHMSA within 60 days of all probable violations found? Yes = 1 No = 0 Needs Improvement = .5 Notes:	1
6 Evaluator	Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? Yes = 1 No = 0 Needs Improvement = .5 Notes:	1
7 Evaluator	General Comments: Info Only = No Points Notes:	Info Only