



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

1200 New Jersey Avenue SE
Washington DC 20590

2012 Natural 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)



2012 Natural Gas State Program Evaluation -- CY 2012
Natural Gas

State Agency: Virginia
Agency Status:
Date of Visit: 05/28/2013 - 05/31/2013
Agency Representative: Massoud Tahamtani, Director of Utility & Railroad Safety
 Jim Hotinger, Assistant Director
PHMSA Representative: Glynn Blanton, USDOT/PHMSA State Programs
Commission Chairman to whom follow up letter is to be sent:
Name/Title: James C. Dimitri, Chairman
Agency: Virginia State Corporation Commission
Address: Tyler Building, P.O. Box 1197
City/State/Zip: Richmond, Virginia 232218

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 2012 (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	9	9
B Program Inspection Procedures	15	15
C Program Performance	44	44
D Compliance Activities	15	15
E Incident Investigations	9	9
F Damage Prevention	8	8
G Field Inspections	12	12
H Interstate Agent State (If Applicable)	0	0
I 60106 Agreement State (If Applicable)	5	5
TOTALS	117	117
State Rating		100.0

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

1	Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1 (A1a) Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

A review of progress report Attachment 1 found the information was correctly entered with the jurisdictional authority over natural gas facilities. Virginia State Corporation Commission (VA SCC) has a 60106 agreement pertaining to municipal distribution systems.

2	Review of Inspection Days for accuracy - Progress Report Attachment 2 (A1b) Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

A review of Attachment 2 found the information to be correct. No issues.

3	Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3 (A1c) Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

No issues in the review of Attachment 3 regarding operator and inspection units. It was noted the operator's name and ID number were entered and checked by staff members.

4	Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4 (A1d) Yes = 1 No = 0 Needs Improvement = .5	1	NA
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Evaluator Notes:

No reportable incidents in CY2012.

5	Accuracy verification of Compliance Activities - Progress Report Attachment 5 (A1e) Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

A review of Attachment 5 found the information to be correct. VA SCC continues to count each piece of evidence of a probable violation and records this information in their files and Note section of Attachment 5.

6	Were pipeline program files well-organized and accessible? - Progress Report Attachment 6 (A1f, A4) Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

Yes. A review of inspections reports maintained electronically in PIPES and in file folders on probable violations was found well organized.

7	Was employee listing and completed training accurate and complete? - Progress Report Attachment 7 (A1g) Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

Yes, a detailed review of employees listed on attachment 7 was conducted using a spreadsheet to post the date each individual completed the TQ courses. This information was compared to the SABE training. Each inspector category and number of months was listed correctly.

8	Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8 (A1h) Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:



VA SCC has automatic adoption of federal regulations. No issues.

9 List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10 (H1-3) 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A review of Attachment 10 found the information on past and future activities was complete and informative.

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

Evaluator Notes:

No issues of concern in this section.

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



PART B - Program Inspection Procedures

Points(MAX) Score

1	Standard Inspections (B1a) Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

Yes, this is listed in VA SCC Pipeline Safety Program Procedures on page 8. The procedures contain established frequencies and include a risk based method to schedule the inspections. All gas operators are inspected each year and 10% of their facilities are reviewed.

2	IMP Inspections (including DIMP) (B1b) Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

Yes, this is listed in VA SCC Pipeline Safety Program Procedures on page 8. IMP inspections are performed once every year and field audits (pig digs, pig runs, etc.) as necessary.

3	OQ Inspections (B1c) Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

Yes, this is listed in VA SCC Pipeline Safety Program Procedures on pages 8 & 9. OQ inspections are performed during the standard inspection and field checks. If a probable violation is found in the field the VA SCC inspector will perform a OQ check.

4	Damage Prevention Inspections (B1d) Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

Yes, this is listed in VA SCC Pipeline Safety Program Procedures on page 11. Damage prevention, checking locate tickets & misc. items are performed during the standard inspection and field checks.

5	On-Site Operator Training (B1e) Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

On site operator training is provided at the VA SCC Pipeline Safety Seminar. No issues.

6	Construction Inspections (B1f) Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

Yes, this is listed in VA SCC Pipeline Safety Program Procedures on page 10. The VA SCC Division receives Daily Work Sheets from companies showing their construction activities.

7	Incident/Accident Investigations (B1g) Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

Yes, this is listed in VA SCC Pipeline Safety Program Procedures in Section VII. Also, additional information is listed in Appendix 7.

8	Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? (B2a-d, G1,2,4) Yes = 6 No = 0 Needs Improvement = 1-5	6	6
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- | | | | | |
|----|---|--------------------------------------|--------------------------|---|
| a. | Length of time since last inspection | 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 No 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:

- A. Yes, this is listed in VA SCC Pipeline Safety Program Procedures on page 8.
- B. Yes, this is listed as previous year's inspection records on page 8.
- C. Yes, this is listed as construction, maintenance & replacment activities on pg 8.
- D. Yes, this is listed as inspection units as determined by guidelines.
- E. Yes, this is listed on pages 8 & 9.
- F. Yes, this is listed on page 9.

9 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section.

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



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 (A12) 5 5
 Yes = 5 No = 0
 A. Total Inspection Person Days (Attachment 2):
 1665.11
 B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
 220 X 9.37 = 2062.13
 Ratio: A / B
 1665.11 / 2062.13 = 0.81
 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)= 1665.11
 B.Total Inspection Person Days Charged to the program(220*Number of Inspection person years(Attachment 7)=2062.13282

Formula: Ratio = A/B = 1665.11/2062.13282 = 0.81
 Rule: (If Ratio >= .38 then points = 5 else Points = 0.)
 Thus Points = 5

- 2** Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines for requirements) Chapter 4.4 (A8-A11, G19) 5 5
 Yes = 5 No = 0 Needs Improvement = 1-4
- | | | | |
|---|--------------------------------------|--------------------------|---|
| a. Completion of Required OQ Training before conducting inspection as lead? | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. Completion of Required DIMP*/IMP Training before conducting inspection as lead? *Effective Evaluation CY2013 | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. Root Cause Training by at least one inspector/program manager | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. Note any outside training completed | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

A review of TQ records indicate the five newly hired inspectors have completed several Web Based Training Courses and have been scheduled to attend the PL1250 in CY2013. Nine inspectors have completed the OQ course, five inspectors have completed the Root Cause course and two inspectors have completed the DIMP course. 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 (A5) 2 2
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, Jim Hotinger, Assistant Director, has extensive knowledge of Virginia's rules and regulations and the pipeline safety regulations.

- 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 (A6-7) 2 NA
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

No response was required from Chairman Christie in the letter mailed on July 31, 2012 pertaining to the 2011 State Program Evaluation of the pipeline safety program.

- 5** Did State hold PHMSA TQ Seminar in Past 3 Years? Chapter 8.5 (A3) 2 2
 Yes = 2 No = 0

Evaluator Notes:

Yes, VA SCC held a TQ seminar on October 23-25, 2012 in Virginia Beach, VA. Approximately two hundred twenty-five



individuals attending the seminar. This on site training was provided to the operator on changes and requirements of pipeline safety regulations and rules of the VA SCC.

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- | | | | |
|----------|---|---|---|
| 6 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1 (B3)
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|----------|---|---|---|

Evaluator Notes:

Yes, this information was checked using their data base program called PIPES. We found the operators were inspected in accordance with their risk ranking written procedures. No areas of concern.

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|----------|---|---|---|
| 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 (B4-5)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

Yes, VA SCC inspectors use the federal inspection forms to perform inspections. The form and information is uploaded into the PIPES data base. A check of several inspection forms found the documents to be complete with required information.

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|----------|--|---|---|
| 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 (B7)
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Yes, a review of inspection performed on Columbia Gas of Virginia on November 14, 2012 indicated this item was reviewed with the operator.

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|----------|---|---|---|
| 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 (B8)
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Yes, a review of inspection performed on Roanoke Gas Company on December 21, 2012 indicated this item was reviewed with the operator.

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|-----------|--|---|---|
| 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 (B9)
Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

Yes, a review of inspection performed on Southwestern Virginia Gas Company-Martinsville on December 27, 2012 indicated this item was reviewed with the operator.

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|-----------|---|---|---|
| 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 (B10,E5)
Yes = 1 No = 0 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes, a review of inspection performed on Washington Gas Light Company Springfield on December 5, 2012 indicated this item was reviewed with the operator.

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|-----------|---|---|---|
| 12 | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues? Data Initiative (G6-9,G16)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

Yes. VA SCC staff members reviewed the operator's annual reports and record the results into their PIPES data base. The review takes into consideration the operator's trends and issues on their facilities.

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- | | | | |
|-----------|--|---|---|
| 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 (G10-12)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|

Evaluator Notes:

Yes, a review of the IMDB web site indicated four OQ inspection results were unloaded into the federal database in a timely manner. One inspection was performed on Virginia Natural Gas and NuStar Energy and two inspections performed on Washington Gas Company in CY2012. No issues.

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- | | | | |
|-----------|---|---|---|
| 14 | Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission? (G14)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes, this item is listed on the federal form 1- Transmission Line Inspection. VA SCC staff members monitor this item on their new construction notifications from the operator.

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- | | | | |
|-----------|--|---|---|
| 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 (I1-3)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|

Evaluator Notes:

Yes, VA SCC inspectors during their field inspections will verify the operator is conducting this requirement. They use PHMSA Federal form 13 in checking this item.

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- | | | | |
|-----------|--|---|---|
| 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 (I4-7)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|

Evaluator Notes:

Yes, this is performed and checked by the inspector during the field inspection. They use the federal inspection form in verifying the operator's compliance.

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- | | | | |
|-----------|--|---|---|
| 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 (I8-12)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|

Evaluator Notes:

Yes, this is checked on federal form 16 and discussed with the operator. A review of the inspection conducted on Roanoke Gas Company on May 1-2, 2012 indicate this item was reviewed and checked.

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- | | | | |
|-----------|---|---|---|
| 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, VA SCC inspectors have completed the first round of inspections on all distribution systems. A review of the DIMP inspection on Washington Gas Light Company dated September 27, 2012 was complete and uploaded into the PHMSA database. Also, Atmos Gas Company and Roanoke Gas Company DIMP inspection have been uploaded into the database.

- 19** 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 be complete by December 2013 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, VA SCC inspectors have verified and completed public awareness inspections on five operators as listed below. Washington Gas & Light Company (4-23-12), RGC Resources (12-14-12), NiSource (1-31-12), AGL Resources (3-14-12) and Atmos Energy (1-10-12).

- 20** 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). (G20-21) 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, this is accomplished via their web site and meetings with company officials.

- 21** Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 (B6) 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, one Safety Related Condition report was submitted by Columbia Gas of Virginia on March 26, 2012. No issues pertaining to follow-up between PHMSA Eastern Region and VA SCC were required.

- 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? (G13) 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, this is accomplished during the review of the DIMP plan and leak records submitted by the operator. A review of this item is considered in VA SCC risk model.

- 23** Did the state participate in/respond to surveys or information requests from NAPS or PHMSA? (H4) 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, a review of email correspondence from Robert Miller to the VA SCC about the IA form used by state agencies confirm the agency is participating in NASPR surveys.

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

Evaluator Notes:

No issues.

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



PART D - Compliance Activities

Points(MAX) Score

- 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 (B12-14, B16, B1h) 4 4
Yes = 4 No = 0 Needs Improvement = 1-3
- a. Procedures to notify an operator (company officer) when a noncompliance is identified Yes No Needs Improvement
- b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns Yes No Needs Improvement

Evaluator Notes:

- A. This is located in VA SCC Pipeline Safety Procedures, Section III. WRITTEN NOTICE OF PROBABLE VIOLATION page 33.
B. This is located on page 35-36 of the Pipeline Safety Procedures document.

- 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 (B11,B18,B19) 4 4
Yes = 4 No = 0 Needs Improvement = 1-3
- a. Were compliance actions sent to company officer or manager/board member if municipal/government system? Yes No Needs Improvement
- b. Were probable violations documented? Yes No Needs Improvement
- c. Were probable violations resolved? Yes No Needs Improvement
- d. Was the progress of probable violations routinely reviewed? Yes No Needs Improvement

Evaluator Notes:

- A. Yes, a review of inspection report and letter sent to Ms. Jodi Gidley, President, of Virginia Natural Gas Inc. on September 14, 2012 confirmed this process is being followed.
B. Yes, a review of the inspection report for Virginia Natural Gas show all probable violations were documented correctly.
C. Yes, probable violations cited against Virginia Natural Gas were resolved.
D. Yes, VA SCC staff members review the operator's progress in correctly the probable violations.

- 3** Did the state issue compliance actions for all probable violations discovered? (B15) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, a review of progress report and VA SCC files indicate 322 probable violations were cited against operators for non-compliance.

- 4** Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary. (B17, B20) 2 2
Yes = 2 No = 0

Evaluator Notes:

Yes, this process is described in the VA SCC Pipeline Safety Procedure manual.

- 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) (B27) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, the program manager is familiar with imposing civil penalties. In CY2012 VA SCC assessed and collected \$787,675 from five operators.

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

Evaluator Notes:

Yes, in CY2012 VA SCC assessed and collected \$787,675 from five operators.



7 General Comments:
Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

No issues in this section.

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



PART E - Incident Investigations

Points(MAX) Score

- 1** 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 (A2,D1-3) 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. This item is located on pages 40-41 of the VA SCC Pipeline Safety Procedures Manual.
B. This is addressed on page 41 of the VA SCC Pipeline Safety Procedure Manual.

- 2** 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 (D4) 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, this is addressed on page 39 of the Pipeline Safety Procedures Manual.

- 3** Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? (D5) 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 incident that occurred on December 19, 2010 on Washington Gas Company's facilities at 4303 Lees Corner Road in Chantilly, Virginia conducted by VA SCC was found to be investigated thoroughly. The investigation resulted in a civil penalty being cited and collected from Washington Gas Company.

- 4** Did the state initiate compliance action for violations found during any incident/accident investigation? (D6) 1 1
Yes = 1 No = 0

Evaluator Notes:

Yes, a civil penalty was cited and collected from Washington Gas Company for the incident that occurred on December 19, 2010 at 4303 Lees Corner Road in Chantilly, Virginia.

- 5** 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 (D7) 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes. Contacted PHMSA Eastern Region on June 3, 2013 requesting information about this item. Information received indicate VA SCC did assist the region office when requested on appropriate follow-up action relatvie to incident reports or calls about potential leakage. No issues.

- 6** Does state share lessons learned from incidents/accidents? (sharing information, such as: at NAPS Region meetings, state seminars, etc) (G15) 1 1
Yes = 1 No = 0

Evaluator Notes:

Yes, VA SCC shared information about incidents/accidents during the CY2012 TQ Pipeline Safety Seminar conducted on October 22, 2012 in Virginia Beach, VA.

7 General Comments:

Info Only = No Points

Evaluator Notes:

No issues.

Info OnlyInfo Only

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



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 (E1) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, this item is reviewed in PHMSA Federal Inspection Form 2. A review of two inspection reports, Columbia Gas of Virginia dated November 14, 2012 and Southwestern Virginia Gas Company dated December 27, 2012 confirmed this item is checked. 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? (E2) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, this is checked during the pipeline safety inspection audit, field inspections and verified in VA SCC PIPES database.

- 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.) (E3) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, VA SCC adopted the CGA Best Practices and provided this information to all stakeholders on marking, 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) (E4,G5) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, VA SCC maintains a database on the number of pipeline damages that are reported by the operator to their agency. In addition, the VA One Call Center provides information to VA SCC on the number of tickets requested by a caller involving gas facilities in the area. Using the damage reports and locate requests VA SCC determines the number of damages per 1,000 locate request.

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

Evaluator Notes:

No issues.

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 Only Info Only
 Info Only = No Points

Name of Operator Inspected:
 Washington Gas Light Company & Columbia Gas of Virginia, Inc.
 Name of State Inspector(s) Observed:
 Jim Burkett, Utilities Engineer
 Location of Inspection:
 Stafford & Springfield, VA
 Date of Inspection:
 June 11, 2013
 Name of PHMSA Representative:
 Glynn Blanton, USDOT/PHMSA State Evaluator

Evaluator Notes:
 This was a construction inspection of several sites pertaining to the installation of a new main and or service lines in Triangle, Prince William, Stafford & Springfield areas. The majority of the inspections were performed on Washington Gas Light Company facilities with one inspection performed on Columbia Gas of Virginia in the Fredericksburg area.

2 Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? (F2) 1 1
 Yes = 1 No = 0

Evaluator Notes:
 Yes, Washington Gas Light Company and Columbia Gas of Virginia, Inc. were notified on May 28, 2013 about the proposed inspection visits.

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) (F3) 2 2
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:
 Yes, this writer observed the VA SCC inspector using a check list and entering information about the pipeline material and individuals qualified to work on the construction project. All project work was being performed by either NPL Construction Company or Miller Pipeline Company personnel.

4 Did the inspector thoroughly document results of the inspection? (F4) 2 2
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:
 Yes, the inspector documented all information about what he observed, found and suggested to the operator crews pertaining to the construction site. No violations were found or noted.

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.) (F5) 1 1
 Yes = 1 No = 0

Evaluator Notes:
 Yes. At each construction site the operator's equipment was checked by the inspector before checking the individuals qualifications.

6 Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) (F7) 2 2
 Yes = 2 No = 0 Needs Improvement = 1

- a. Procedures
- b. Records
- c. Field Activities
- d. Other (please comment)



Evaluator Notes:

This field inspection consisted of four different construction site visits. Listed below are the construction sites.

1. Washington Gas Company- Lynbrook @Brandon Avenue in Springfield, VA. This work involved cutting and capping a 4 inch steel main and tie in a 4 inch Driscope PE 6500 pipeline line.
2. Washington Gas Company- Backlick Road in Springfield, VA. This work involved a tie in to a 2 inch Driscope PE 6500 pipeline line.
3. Washington Gas Light Company - Dorchester Street Springfield, VA. New installation of main and service lines into a new subdivision. Observerd company construction crew fusing PE Driscope 6500 pipe.
4. Columbia Gas of Virginia- 18747 Pier Trail Drive Prince William County, VA. New installation of a service line and tap main to provide service to the customer.

7	Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) (F8) Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

Yes, the inspector was very knowledge about the pipeline safety regulations. No issues or concerns were noted or found.

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) (F9) Yes = 1 No = 0	1	1
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Evaluator Notes:

Yes, at the end of each site inspection, the inspector reviewed with the operator representatives any areas of concern or comments about the construction visit.

9	During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable) (F10) Yes = 1 No = 0	1	1
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Evaluator Notes:

No probable violations were found or noted.

10	General Comments: What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) Other. Info Only = No Points	Info Only	Info Only
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|----|-------------------------------|-------------------------------------|--|
| 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 checked="" type="checkbox"/> | |



- t. Navigable Waterway Crossings
- u. Odorization
- v. Overpressure Safety Devices
- w. Plastic Pipe Installation
- x. Public Education
- y. Purging
- z. Prevention of Accidental Ignition
- A. Repairs
- B. Signs
- C. Tapping
- D. Valve Maintenance
- E. Vault Maintenance
- F. Welding
- G. OQ - Operator Qualification
- H. Compliance Follow-up
- I. Atmospheric Corrosion
- J. Other

Evaluator Notes:

This was a construction inspection of four sites pertaining to the installation of a new main and or service lines in Triangle, Prince William, Stafford & Springfield areas. The majority of the inspections were performed on Washington Gas Light Company facilities with one inspection performed on Columbia Gas of Virginia in the Fredericksburg area.

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



PART H - Interstate Agent State (If Applicable)

Points(MAX) Score

1 Did the state use the current federal inspection form(s)? (C1) 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
NA.

2 Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? (C2) 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
NA.

3 Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? (C3) 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
NA.

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.) (C4) 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
NA.

5 Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (C5) 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
NA.

6 Did the state give written notice to PHMSA within 60 days of all probable violations found? (C6) 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
NA.

7 Did the state initially submit documentation to support compliance action by PHMSA on probable violations? (C7) 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
NA

8 General Comments: Info OnlyInfo Only
Info Only = No Points

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

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- | | | | |
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| 1 | Did the state use the current federal inspection form(s)? (B21)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, a review of inspection performed on City of Charlottesville dated December 12, 2012 found VA SCC used the federal inspection form 2. No issue.

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|----------|--|---|---|
| 2 | Are results documented demonstrating inspection units were reviewed in accordance with state inspection plan? (B22)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, a review of the inspection dated November 15, 2012 on City of Danville confirmed VA SCC is meeting this requirement. VA SCC inspects all municipal gas operators annually.

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| 3 | 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.) (B23)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes. A review of inspection reports found all three municipal gas operators were cited for probable violations in CY2012. This information was forwarded to PHMSA Eastern Region for compliance action.

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| 4 | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (B24)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
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Evaluator Notes:

No conditions of imminent safety hazard to the public were reported in CY2012. NA.

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| 5 | Did the state give written notice to PHMSA within 60 days of all probable violations found? (B25)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, after completing the City of Richmond inspection on February 28, 2012 and finding probable violations, VA SCC forwarded the written notice to PHMSA Eastern Region on April 4, 2012. This time schedule was within 60 days.

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| 6 | Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? (B26)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, a review of file folder and other relative information indicate VA SCC provided all supporting documentation to PHMSA Eastern Region.

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| 7 | General Comments:
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

No issues.

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

