

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

## 2018 Gas State Program Evaluation

for

Public Service Commission of the District of Columbia

### 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)



# 2018 Gas State Program Evaluation -- CY 2018

Gas

**State Agency:** District of Columbia

**Agency Status:**

**Date of Visit:** 10/22/2019 - 10/24/2019

**Agency Representative:** Udeozo Ogbue

**PHMSA Representative:** Don Martin

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

**Name/Title:** Willie L. Phillips, Chairman

**Agency:** Public Service Commission of the District of Columbia

**Address:** 1325 G Street NW, Suite 800

**City/State/Zip:** Washington, District of Columbus 20095

**Rating:**

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

## 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 2018 (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.

## 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
12	12
44	44
15	15
4	4
8	8
12	12
0	0
0	0

### TOTALS

**105 105**

**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:

No inaccuracies found. The DCPSC has one operator that has one distribution inspection unit and one transmission unit.

- |          |  |   |   |
|----------|--|---|---|
| <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:

The DCPSC accounts for inspection person days in each inspection entered into a database. The inspection person days are reported out of the database and compiled for entry into Attachment 2. No issues found resulting in loss of points.

- |          |  |   |   |
|----------|--|---|---|
| <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:

No inaccuracies found.

- |          |  |   |   |
|----------|--|---|---|
| <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:

The DCPSC had no incidents listed on Attachment 4. The Pipeline Data Mart did not have any incidents listed for CY2018. No inaccuracies were found.

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

Evaluator Notes:

The compliance data was found to be accurate.

- |          |   |   |   |
|----------|---|---|---|
| <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:

No issues were identified with the organization of the DCPSC files.

- |          |  |   |   |
|----------|--|---|---|
| <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:

No inaccuracies were found with the information on Attachment 7.

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

Evaluator Notes:

No issues were found. The DCPSC has automatic adoption of federal regulations.

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

Evaluator Notes:

No issues were identified with Planned Performance activities described in Attachment 10.

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

Evaluator Notes:

No issues were identified that resulted in a loss of points.

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, the DCPSC provides this guidance on Pages 11 and 12 of NATURAL GAS PIPELINE SAFETY INSPECTION AND ENFORCEMENT PROCEDURES, revision May 24, 2019. (DCPSC Procedures). Pre-inspection activities are described on Page 10. Post inspection activities are covered on Page 15.

- |   |  |   |   |
|---|--|---|---|
| 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:**

DIMP inspection activities are covered on Page 12 and 13 in DCPSC Procedures. It was recommended that Transmission Integrity Management Procedures be separated from procedures for Distribution Integrity Management?

- |   |  |   |   |
|---|--|---|---|
| 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:**

OQ Inspection Procedures are described on Page 13 and 14 in DCPSC Procedures.

- |   |   |   |   |
|---|---|---|---|
| 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:**

Damage Prevention Inspection Procedures are described on Page 14 in the DCPSC Procedures.

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

Yes = 1 No = 0 Needs Improvement = .5

**Evaluator Notes:**

The DCPSC has one private distribution operator. There are no small operators in Washington DC. Operator training is not applicable in DC.

- |   |  |   |   |
|---|--|---|---|
| 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:**

Construction Inspection Procedures are covered on Page 14 in the DCPSC Procedures.

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

The DCPSC considers (a through (d for identifying locations within the one operator's system. There is not a need to prioritize inspection units since the entire area of the District of Columbia is served by one operator and inspection unit. The DCPSC may want to consider breaking the one unit which has approximately 125,000 service lines.

**8** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no deficiencies noted where the DCPSC did not meet the requirements of Part B of this evaluation.

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



## 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):  
225.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
220 X 2.00 = 440.00

Ratio: A / B  
225.00 / 440.00 = 0.51

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

### Evaluator Notes:

The DCPSC's actual ratio was 0.51 which exceeded the required ratio of 0.38.

- 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 <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"/> |
| e. | Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector. | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

### Evaluator Notes:

Upon a review of completed inspections there no instances where the inspector did not have the required training. Three individuals have completed the root cause training.

Two Inspectors and Program Manager completed the VASCC and Greater Chesapeake Damage Prevention seminars. Program Manager and one Inspector completed CAMP NARUC, Week One Training.

- 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, the State Program Manager successfully completed 15 TQ Courses and has managed the program successfully for years with 100% scores in PHMSA Annual Program Evaluations for three (3) consecutive years (2015, 2016 and 2017). He also won NARUC's prestigious Terry Barnich Award in 2018 for his leadership and achievements in developing and implementing natural gas and electricity safety regulations internationally.

- 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:

A response was not required for the CY2017 evaluation letter.

- 5 Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5 1 1  
Yes = 1 No = 0

### Evaluator Notes:

The DCPSC participates with the Virginia Pipeline Safety Program in conducting seminars. Two Inspectors and Program Manager attended the Virginia SCC 2018 Pipeline Safety Seminar and Conference.

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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<br>Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|---|--|---|---|

Evaluator Notes:

The DCPSC oversees one operator with two inspection units (one transmission unit and one distribution unit). There were no instances found where the DCPSC did not meet its intervals. The DSPSC should modify its database to capture all of the inspection form activity that results in a full Standard Inspection. The current method to verify that a Standard Inspection has been completed is burdensome at this time.

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

Evaluator Notes:

Upon a review of randomly selected inspection files, no instances were found where a code requirement was not covered or the results of a requirement covered was not documented.  
Federal and DC Code requirements are uploaded to and accessed from a new automated work flow software/system for inspections and enforcement, and compliance reports. The system deploys mobile, digital and cloud-based GIS technology in a smart device (tablet) to seamlessly provide multiple access to/from all Inspectors and Program Manager to complete inspections forms in the field, take pictures, send/receive emails, retrieve rules and codes, retrieve and analyze data and create inspection and enforcement documents.

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

Evaluator Notes:

Yes, the question is on DCPSC Inspection Form (EN 42). The procedures are contained on Page 2 of WGL's O&M Procedures #4078.

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

Evaluator Notes:

Yes, contained WGL's O&M Procedures #4011, #4014, #4050, #4078, #4079, and #4083. The DCPSC's Inspectors verifies the Operator conducts failure analysis of failed components as part of its engineering review.

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

Evaluator Notes:

Yes, contained in WGL's O&M Procedure #1040, #3220 - #3222, and WGL's Emergency Procedures Manual. Question is on DCPSC Inspection Form (EN 42). DCPSC Inspectors monitor to ensure that the operator tests for the presence of gas in a 360-degrees pattern from the point of origin, not just around the pipe, to determine the extent of migration. The Inspectors also monitor to ensure that the operator has surveyed for multiple leaks from a single incident.

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

Evaluator Notes:

Yes, following the Operator's filing of the mandatory bi-monthly damage reports, the DCPSC Inspectors conduct records



inspections and confirm appropriate root cause investigation and remedial action by the Operator. Also, our Inspectors encourage the Operator to conduct failure analysis of failed components as part of its engineering review.

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

Evaluator Notes:

Yes, the DCPSC inspected, reviewed and analyzed data in WGL's Annual Report for CY 2018 and used the spreadsheet to compare WGL's performance on leaks per 100 Miles of Main and leaks per 1,000 Services, etc. to the performance of other LDCs in the east coast in their Annual Reports to PHMSA. The DCPSC noted WGL's leak total; checked excavation damage total and causes of leaks on mains and services; noted the 45% increase in corrosion-caused hazardous leaks to mains eliminated/repaired; 48% increase in excavation-damage caused hazardous leaks to mains eliminated/repaired; 21% increase in corrosion-caused hazardous leaks to services eliminated/repaired; and 9% decrease in excavation-damage caused leaks to services in CY 2018 compared to CY 2017. The DCPSC also noted that the % of Unaccounted for Gas increased from 3.69% in CY 2017 to 4.16% in CY 2018. The damage ratio (DR) at the time of reporting in 2018 increased from 1.63 in FY 2017 to 1.74 Hits/1,000 tickets, although WGL achieved a lower Damage Ratio of 1.57 overall in FY 2018, down from 1.75 in 2017 and 1.81 in 2016. The DCPSC discussed these trends with the Operator and plan to address them further in two planned Technical Conferences with the Operator in CY 2019.

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|-----------|---|---|---|
| <b>13</b> | Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission?<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes, the DCPSC reviews Pipeline Data Mart report and compares the report to NPMS database. There are 4.5 miles of gas transmission pipeline in DC.

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|-----------|---|---|---|
| <b>14</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

Yes, D&A inspections were conducted in CY 2018.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>15</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

Yes, the DCPSC conducts OQ Plan/Records inspections per Federal Protocols using on Form EN 32 Form every 36 months and conduct OQ Field inspections (OQ 9) annually using Form EN 32.9 Form and List of Covered Tasks. The DCPSC continues to participate in the NAPS Eastern Region collaborative investigation of gas contractor OQ test cheating scandal and in the review of New York PSC's White Paper. The DCPSC issued a Data Request to WGL and directed it to conduct a deeper investigation of the Company's DC contractors' involvement in the scandal and report to the Commission. The DCPSC worked closely working with Virginia SCC to monitor WGL's retraining, testing, requalification and placement of affected contractor personnel. The DCPSC provided WGL with the OQ Program redesign checklist from the NAPS Eastern Region collaborative investigation of gas contractor OQ programs.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>16</b> | 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). (Are the State's largest operators programs being contacted or reviewed annually? Are replies to Operator IM notifications addressed? (formerly part of Question C-13)). 49 CFR 192 Subpart 0<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

Yes, the DCPSC conducted inspections of WGL's IMP plan in 2011 and 2014 and conducted new inspections on IMP in 2017 and 2018.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>17</b> | Is state verifying operator's gas distribution integrity management Programs (DIMP)?<br>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). (Are the State's largest operators programs being contacted or reviewed annually?). 49 CFR 192 Subpart P<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|
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Evaluator Notes:

Yes, the DCPSC conducted another round of DIMP Inspections in CY 2018 and verified that WGL met all the requirements.

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|-----------|---|---|---|
| <b>18</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. PAPEI Effectiveness Inspections should be conducted every four years by operators. 49 CFR 192.616<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|
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Evaluator Notes:

Yes, the DCPSC completed PAPEI Effectiveness Inspections in September 2018.

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|-----------|--|---|---|
| <b>19</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 |
|-----------|--|---|---|
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Evaluator Notes:

Yes, the proceedings in gas pipeline safety formal cases such as Projectpipes to replace at risk pipes continue to be posted on the Commission web site and project progress is posted on social media such as Facebook and Instagram. Further, enforcement actions such as NOPVs and related Settlements are available in the Commission's docket system. The pipeline safety commitments by the recent merger applicants are also available in the Commission's docket and on the website.

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|-----------|---|---|----|
| <b>20</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 | NA |
|-----------|---|---|----|
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Evaluator Notes:

None were reported in CY2018.

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|-----------|---|---|---|
| <b>21</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, black plastic services are part of the Projectpipes project approved by the DC Commission to encourage and enable WGL to reduce risk and enhance safety by replacing aging corroded or leaking cast iron mains, bare and/or unprotected steel mains and services, and black plastic services in the distribution system. Additionally, any plastic pipe or components that have shown a record of defects/leaks identified in the Operator's system are factored into the risk assessment and included in the Projectpipes project list.

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|-----------|--|---|---|
| <b>22</b> | Did the state participate in/respond to surveys or information requests from NAPS or PHMSA?<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|
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Evaluator Notes:

No instances were found where the DCPSC did not participate.

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|-----------|--|---|----|
| <b>23</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.<br>No = 0 Needs Improvement = .5 Yes = 1 | 1 | NA |
|-----------|--|---|----|
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Evaluator Notes:

There are no waivers listed on PHMSA's website that have been issued by the DCPSC. The DCPSC confirmed this.

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24	Did the state attend the NAPS National Meeting in CY being evaluated?	1	1
	No = 0 Needs Improvement = .5 Yes = 1		

Evaluator Notes:

Yes.

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25	Discussion on State Program Performance Metrics found on Stakeholder Communication site - <a href="http://primis.phmsa.dot.gov/comm/states.htm">http://primis.phmsa.dot.gov/comm/states.htm</a>	2	2
	No = 0 Needs Improvement = 1 Yes = 2		
a.	Discussion of Potential Accelerated Actions (AA's) based on any negative trends	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
b.	NTSB P-11-20 Meaningful Metrics	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>

Evaluator Notes:

The DCPSC is monitoring the performance metrics compiled by PHMSA. The DCPSC has noted their observations as follows:

1. 45% increase in corrosion-caused hazardous leaks to mains eliminated/repaired.
2. 48% increase in excavation-damage caused hazardous leaks to mains eliminated/repaired.
3. 21% increase in corrosion-caused hazardous leaks to services eliminated/repaired.
4. 9% decrease in excavation-damage caused leaks to services in CY 2018 compared to CY 2017.
5. Noted that the % of Unaccounted for Gas increased from 3.69% in CY 2017 to 4.16% in CY 2018.
6. The damage ratio (DR) at the time of reporting in 2018 increased from 1.63 in FY 2017 to 1.74 Hits/1,000 tickets, although WGL achieved a lower Damage Ratio of 1.57 overall in FY 2018, down from 1.75 in 2017 and 1.81 in 2016. The DCPSC discussed these trends with the Operator and plan to address them further in two planned Technical Conferences with the Operator in CY 2019.

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26	Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT) Has the State updated SICT data?	1	1
	No = 0 Yes = 1		

Evaluator Notes:

A review was conducted of the DCPSC's entries in the SICT for 2018. The inspection person days required resulted in 225 days. 127 days were assigned for Construction Inspections leaving 98 days for other inspection types for a large distribution unit of approximately 125,000 service lines and a small gas transmission system. A majority of the 98 days involved comprehensive Standard Inspections of the large distribution unit. The DCPSC stated that the records and procedures portion of a Standard Inspection of the large distribution unit takes 24 days and the field portion takes approximately 40 days. The remaining 34 days were estimated to cover the other inspection types for distribution and all inspection types for the small transmission system. The 64 days for comprehensive Standard Inspections was entered into the SICT on conducting the inspections on an annual basis versus the three year cycle contained in the DCPSC's procedures. This resulted in overstating the 64 days by not using the three year cycle. Although overstated, it results more time spent in the field and does not impact DCPSC's oversight negatively.

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27	Did the State verify Operators took appropriate action regarding Pipeline Flow Reversals, Product Changes and Conversions to Service? See ADP-2014-04	1	NA
	Needs Improvement = .5 No = 0 Yes = 1		

Evaluator Notes:

There were no flow reversals reported by the operator in DC.

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

Evaluator Notes:

The DCPSC met the requirements of Part C of this evaluation.

---

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"/> |
| c.       | Procedures regarding closing outstanding probable violations   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

Yes, the written procedures in the DCPSC's NGPSIEP Manual meet these requirements.

- |          |  |                                      |  |
|----------|--|--------------------------------------|--|
| <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? (Incident Investigations do not need to meet 30/90 day requirement) 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.       | Document probable violations   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| c.       | Resolve probable violations  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| d.       | Routinely review progress of probable violations   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| e.       | Within 30 days, conduct a post-inspection briefing with the owner or operator of the gas or hazardous liquid pipeline facility inspected outlining any concerns; and   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| f.       | Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection.  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

Upon a review of randomly selected inspection files, all requirements were met.

- |          |  |   |   |
|----------|--|---|---|
| <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, inspection files for those inspections identifying probable violations confirmed that compliance actions were issued.

- |          |   |   |   |
|----------|---|---|---|
| <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:

No issues with due process were identified from reviewing the inspection files.

- |          |   |   |   |
|----------|---|---|---|
| <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, the Program Manager exhibited excellent knowledge of the process to issue civil penalties. The DCPSC has a section in its procedures manual that is very detailed in its consideration of penalties and has an excellent description of how penalty amounts are determined.

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

Evaluator Notes:

Yes, Attachment 5 of recent Progress Reports shows that the DCPSC has used its authority to issue and collect monetary penalties.

---

7 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

The DCPSC has complied with the requirements of Part D of this evaluation. It should be noted that the DCPSC has an excellent process to determine penalty amounts.

---

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:

Yes, it is contained in Commission Rule in FC No. 1089 and in OCE's NGPSIEP Manual.

- 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:

The DCPSC exhibited knowledge of the MOU and Federal/State Cooperation (Appendix E of the Guidelines for States Participating in the Pipeline Safety Program (Guidelines)).

- 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 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

There were no incidents in Washington, DC during CY2018.

- 4 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? 3 NA  
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:

There were no incidents in Washington, DC during CY2018.

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

Evaluator Notes:

There were no incidents in Washington, DC during CY2018.

- 6 Did the state assist Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

There were no incidents in Washington, DC during CY2018.

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

Evaluator Notes:

There has not been an incident since 2012.

---

**8** General Comments:

Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

The DCPSC complied with the requirements of Part E of this evaluation.

---

Total points scored for this section: 4  
Total possible points for this section: 4





## 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, the DCPSC reviews the Operator's O & M Manual Section 4100 and monitor its deployment of HDD/boring and other trenchless technologies in the District. We have also included the protection of gas facilities from the hazards of drilling and other trenchless technologies in DCPSC's Damage Prevention Inspection Form (EN 27).

- |   |  |   |   |
|---|--|---|---|
| 2 | Did the state inspector verify pipeline operators are following their 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, the DCPSC continues to have access to the One Call Database for locate requests, locates/mark outs, etc. The DCPSC monitors the Operator's compliance with its damage prevention requirements in the Company's O&M Procedures Manual. DCPSC also issued NOPVs and cited 49 CFR 192 ? 605 and 49 CFR 192 ? 614 for the Operator's non-compliance with its own O & M Manual Section 4100 on markings and excavation damage prevention.

- |   |  |   |   |
|---|--|---|---|
| 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, OCE worked in collaboration with the DCPSC Chairman's Office and the Public Relations Specialist to prepare the 2018 April Safe Digging Month proclamations by the Mayor, the District Council, and the Chairman of the Commission, and disseminated Call 811 literature. The DCPSC continued to contribute to the efforts of utilities, excavators, and locators in the District and to collaborate with other District agencies to revise the District's One Call Law to ensure adequate enforcement of the Federal Excavation Damage Prevention Program Final Rule (effective January 1, 2016). The DCPSC worked closely with OGC, the Mayor's Staff, OAG, DDOT, DCRA, and WGL to propose new legislation, the "Underground Facilities Protection Amendment Act (B23-0117)" first introduced in the fall of 2018.

- |   |  |   |   |
|---|--|---|---|
| 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, the DCPSC inspected, reviewed and analyzed data in WGL's Annual Report for CY 2018 and used the spreadsheet to compare WGL's performance on leaks per 100 Miles of Main and leaks per 1,000 Services, etc. to the performance of other LDCs in the east coast in their Annual Reports to PHMSA. The DCPSC noted WGL's leak total. The DCPSC checked excavation damage total and causes of leaks on mains and services. The DCPSC noted the following:

1. 45% increase in corrosion-caused hazardous leaks to mains eliminated/repaired.
2. 48% increase in excavation-damage caused hazardous leaks to mains eliminated/repaired.
3. 21% increase in corrosion-caused hazardous leaks to services eliminated/repaired.
4. 9% decrease in excavation-damage caused leaks to services in CY 2018 compared to CY 2017.
5. Noted that the % of Unaccounted for Gas increased from 3.69% in CY 2017 to 4.16% in CY 2018.
6. The damage ratio (DR) at the time of reporting in 2018 increased from 1.63 in FY 2017 to 1.74 Hits/1,000 tickets, although WGL achieved a lower Damage Ratio of 1.57 overall in FY 2018, down from 1.75 in 2017 and 1.81 in 2016. The DCPSC discussed these trends with the Operator and plan to address them further in two planned Technical Conferences with the Operator in CY 2019.

**5** General Comments:

Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

The DCPSC complied with the requirements of Part F of this evaluation.

---

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<br>Info Only = No Points | Info OnlyInfo Only |
|---|---|--------------------|

Name of Operator Inspected:

Washington Gas and Light

Name of State Inspector(s) Observed:

Ahmadou Bagayoko

Location of Inspection:

13th Street and Maryland Ave., Washington DC and 7th Street and Jefferson,  
Washington, DC

Date of Inspection:

October 23, 2019

Name of PHMSA Representative:

Don Martin

Evaluator Notes:

The DCPSC conducted inspections of two construction projects. At 13 Street and Maryland Ave., the operator was replacing main and services as part of a large main replacement project. At 7th Street and Jefferson, the operator was constructing a new 8 inch P.E. main to tie two systems together to provide additional gas flow capacity.

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

Evaluator Notes:

Yes, a Washington Gas and Light inspector was present at both locations.

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

Evaluator Notes:

Yes, the DSPSC's Construction Inspection Form was used. The inspector completed the form in electronic form on a tablet computer. The form was completed as he progressed through the inspection.

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

Evaluator Notes:

The form was completed on the tablet computer and then uploaded to the DCPSC's database.

- |   |  |   |   |
|---|--|---|---|
| 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, the inspector checked the appropriate equipment being used and verified calibration dates along with the OQ certification of individuals completing covered tasks.

- |   |  |                                     |   |
|---|--|-------------------------------------|---|
| 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 checked="" type="checkbox"/> |   |
|   | b. Records   | <input checked="" type="checkbox"/> |   |
|   | c. Field Activities  | <input checked="" type="checkbox"/> |   |
|   | d. Other (please comment)  | <input type="checkbox"/>            |   |

Evaluator Notes:

No deficiencies were identified with the inspector's coverage of procedures, records and construction activity that was being performed by the operator's contractor.

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

Evaluator Notes:

No deficiencies with knowledge was identified during the inspection.

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) Yes = 1 No = 0	1	1
---	---	---	---

Evaluator Notes:

Yes, at each construction site.

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

Evaluator Notes:

There were no probable violations identified.

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. Info Only = No Points	Info Only	Info Only
----	---	-----------	-----------

- |    |                                   |                                     |
|----|-----------------------------------|-------------------------------------|
| a. | Abandonment                       | <input type="checkbox"/>            |
| b. | Abnormal Operations               | <input checked="" 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 checked="" type="checkbox"/> |
| j. | Deactivation                      | <input type="checkbox"/>            |
| k. | Emergency Procedures              | <input checked="" type="checkbox"/> |
| l. | Inspection of Right-of-Way        | <input type="checkbox"/>            |
| m. | Line Markers                      | <input checked="" type="checkbox"/> |
| n. | Liaison with Public Officials     | <input type="checkbox"/>            |
| o. | Leak Surveys                      | <input type="checkbox"/>            |
| p. | MOP                               | <input type="checkbox"/>            |
| q. | MAOP                              | <input checked="" type="checkbox"/> |
| r. | Moving Pipe                       | <input checked="" 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 checked="" type="checkbox"/> |
| C. | Tapping                     | <input type="checkbox"/>            |
| D. | Valve Maintenance           | <input type="checkbox"/>            |
| E. | Vault Maintenance           | <input type="checkbox"/>            |
| F. | Welding                     | <input type="checkbox"/>            |
| G. | OQ - Operator Qualification | <input checked="" type="checkbox"/> |
| H. | Compliance Follow-up        | <input type="checkbox"/>            |
| I. | Atmospheric Corrosion       | <input type="checkbox"/>            |
| J. | Other                       | <input type="checkbox"/>            |

Evaluator Notes:

The DCPSC inspector met all of the requirements of Part G of this evaluation.

---

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:

The DCPSC is not an interstate agent.

- |          |   |   |    |
|----------|---|---|----|
| <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:

The DCPSC is not an interstate agent.

- |          |  |   |    |
|----------|--|---|----|
| <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:

The DCPSC is not an interstate agent.

- |          |   |   |    |
|----------|---|---|----|
| <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:

The DCPSC is not an interstate agent.

- |          |   |   |    |
|----------|---|---|----|
| <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:

The DCPSC is not an interstate agent.

- |          |  |   |    |
|----------|--|---|----|
| <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:

The DCPSC is not an interstate agent.

- |          |   |   |    |
|----------|---|---|----|
| <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:

The DCPSC is not an interstate agent.

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

Evaluator Notes:

The DCPSC is not an interstate agent.

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 | NA |
|----------|--|---|----|

Evaluator Notes:

The DCPSC does not have a 60106 agreement with PHMSA.

- |          |  |   |    |
|----------|--|---|----|
| <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 | NA |
|----------|--|---|----|

Evaluator Notes:

The DCPSC does not have a 60106 agreement with PHMSA.

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

Evaluator Notes:

The DCPSC does not have a 60106 agreement with PHMSA.

- |          |   |   |    |
|----------|---|---|----|
| <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:

The DCPSC does not have a 60106 agreement with PHMSA.

- |          |  |   |    |
|----------|--|---|----|
| <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 | NA |
|----------|--|---|----|

Evaluator Notes:

The DCPSC does not have a 60106 agreement with PHMSA.

- |          |  |   |    |
|----------|--|---|----|
| <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 | NA |
|----------|--|---|----|

Evaluator Notes:

The DCPSC does not have a 60106 agreement with PHMSA.

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

Evaluator Notes:

The DCPSC does not have a 60106 agreement with PHMSA.

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