



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

1200 New Jersey Avenue SE
Washington DC 20590

2009 Natural Gas State Program Evaluation

for

Public Service Commission of the District of Columbia

Document Legend

PART:

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



2009 Natural Gas State Program Evaluation -- CY 2009
Natural Gas

State Agency: District of Columbia

Agency Status:

Date of Visit: 03/23/2010 - 08/13/2010

Agency Representative: Udeozo Ogbue, P.E.

PHMSA Representative: Dino N.Rathod, P.E.

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

Name/Title: Ms. Betty Ann Kane, Chairman

Agency: Public Service Commission of the District of Columbia

Address: 1333 H Street, N.W.

City/State/Zip: Washington, DC 20005

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 2009 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. A deficiency in any one part of a multiple part question should be scored as needs improvement. Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual certification/agreement attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART F):

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

Scoring Summary

PARTS

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

Possible Points Points Scored

26	23
24.5	21
0	0
1.5	1.5
9	9
12	12
9.5	9.5
3	3
9	9

TOTALS

94.5 88

State Rating 93.1

PART A - General Program Qualifications

Points(MAX) Score

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

SLR Notes:

1 Discussed with PSC Gas Safety staff 2010 Certification Attachments 1, 3, 5 and 7. Based on Guideline Manual Dec 2009- PSC agreed to review and revise number of "Inspections Units" for WG. In addition, Inspection Units for "Intrastate transmission" pipelines will be changed to 1 instead of 5 as noted; Attachment 5 PSC will change Probable Violations and # of Compliance Actions. Attachment 7- PSC agreed to "Qualification Categories" for Pipeline Safety Inspection Staff members only. PHMSA does not need for Admin/Clerical Staff. PHMSA's requirement for "Accurate, Complete and Consistent" information for CY 2009 was re-emphasized to Gas Safety staff for all pertinent documentation and records (by jurisdictional operator as well PSC). PSC agreed to recheck, revise and resubmit as necessary.

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

SLR Notes:

PSC follows requirements of 15 DCMR- para 2306

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

SLR Notes:

DC PSC Gas Safety staff participated May 6&7, 2010 in Maryland PSC sponsored Joint T&Q State seminar at Linthicum Heights, MD

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

SLR Notes:

PSC gas pipeline safety program files are well-organized and kept in a secure bldg.

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

SLR Notes:

PSC Program Manager continues to take required T&Q courses. I reemphasized that he was responsible for all activities of Gas Pipeline Safety Program State Guideline requirements per Ch 4- Para 4.1 (IT includes preparation of all Grant /DOT fund application documentation, Certification, Compliance / Violation letters and successful completion and timely resolution of compliance issues arising from inspections and related activities. I urged better coordination and resolution of pending compliance matters with other group(s) within PSC.. He has participated in PHMSA ER meeting in Essex, Vermont.

- | | | | |
|----------|---|---|---|
| 6 | Did the state respond in writing within 60 days to the requested items in the Chairman's letter following the Region's last program evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

DC PSC responded Feb 18, 2010

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

PSC responded in Feb 18, 2010 four items- Possible negative impact of budgetary constraints; Monitoring possible impact of DIMP; feedback on Adequate state enforcement of pipeline Damage Prevention laws and continued emphasis on strong but fair and consistent regulatory enforcement of pipeline safety code in DC. PHMSA also discussed during this year's audit some of these issues and will reemphasize in Chairman letter.

Personnel and Qualifications

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

Manmohan Singh-ok with T&Q Training (per e-mail of 8-18-2010 list from Jill Nelson)
U. Ogbue started TQ training in March 2009- 3 year to complete
A. Bagayoko started TQ training in Jul 2009- 3 year to complete

9	Brief Description of Non-TQ training Activities: Info Only = No Points For State Personnel: For Operators: For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:	Info Only	Info Only
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SLR Notes:

10	Did the lead inspectors complete all required T&Q OQ courses and Computer Based Training (CBT) before conducting OQ Inspections? (Chapter 4.4.1) Previous Question A.12 Yes = 1 No = 0	1	1
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SLR Notes:

M Singh has completed OQ courses.

11	Did the lead inspectors complete all required TQ Integrity Management (IMP) Courses/Seminars and CBT before conducting IMP Inspections? (Chapter 4.4.1) Previous Question A.13 Yes = 1 No = 0	1	1
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SLR Notes:

M Singh has completed required IMP courses.

12	Was the ratio acceptable of Total inspection Person-days to Total Person-days charged to the program by state inspectors? (Region Director may modify points for just cause) (Chapter 4.3) Previous Question B.12 Yes = 5 No = 0 A. Total Inspection Person Days (Attachment 2): 130.00 B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7): 220 X 1.50 = 330.00 Ratio: A / B 130.00 / 330.00 = 0.39 If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0 Points = 5	5	5
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SLR Notes:

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

SLR Notes:

Ahmadaou Bagayoko joined PSC Staff in Jul 2009.

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

SLR Notes:

Total points scored for this section: 23
Total possible points for this section: 26



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

Points(MAX) Score

Inspection Procedures

- 1** Does the State have a written inspection plan to complete the following? (all types of operators including LNG) (Chapter 5.1) Previous Question B.1 + Chapter 5 Changes + Incorporate LNG 6.5 6
Yes = 6.5 No = 0 Needs Improvement = 50% Deduction
- | | | | | |
|---|---|--------------------------------------|--------------------------|--|
| a | Standard Inspections (Including LNG) (Max points = 2) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b | IMP Inspections (Including DIMP) (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c | OQ Inspections (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d | Damage Prevention (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e | On-Site Operator Training (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f | Construction Inspections (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| g | Incident/Accident Investigations (Max points = 1) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| h | Compliance Follow-up (Max points = 1) | Yes <input type="radio"/> | No <input type="radio"/> | Needs Improvement <input checked="" type="radio"/> |

SLR Notes:

Compliance Concerns- Application of DCMR vs. Federal Regs- Emphasized that per Section 60105(a) federal requirements cannot be made less stringent by DCMR. DC inspection and compliance procedures and DCMR Code must be reviewed and applicable portions revised to comply with min. federal requirements.

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

SLR Notes:

Inspection Performance

- 3** Did the state inspect all types of operators and inspection units in accordance with time intervals established in its written procedures? (Chapter 5.1) Previous Question B.3 2 2
Yes = 2 No = 0

SLR Notes:

- 4** Did the state inspection form cover all applicable code requirements addressed on the Federal Inspection forms? (Chapter 5.1 (3)) Previous Question B.4 1 0
Yes = 1 No = 0

SLR Notes:

- During review of DC Inspection Procedures, it was noted that many inspection check lists/ forms were not reviewed and updated. DC PSC agreed to complete a thorough review and remove obsolete older forms.
- In addition, PSC will insert Revision # and Date to keep track of changes/ revisions.

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

SLR Notes:

Per discussion with PSC, in Construction Check List- Persons from Washington Gas (Company) vs. Contractor will be clearly identified to allow verification if Company Inspector/ Supervisory person was present. PSC staff agreed to make this minor change.

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

SLR Notes:

NO SRC in 2009.

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

SLR Notes:

PSC Check List EN-17 covers this requirements (Part 192.489 (b); WG Procedure 4084

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|----------|--|----|----|
| 8 | Did the state review operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance) (NTSB) Previous Question B.8 | .5 | .5 |
| | Yes = .5 No = 0 | | |

SLR Notes:

DC Check List EN-17 covers this requirements

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|----------|---|----|----|
| 9 | Did the state review operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21? (NTSB) Previous Question B.9 | .5 | .5 |
| | Yes = .5 No = 0 | | |

SLR Notes:

DC Check List EN-17 covers this requirements

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- | | | | |
|-----------|--|---|---|
| 10 | Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 192.617? (NTSB) Previous Question B.10 | 1 | 1 |
| | Yes = 1 No = 0 | | |

SLR Notes:

Dc PSC Check List EN-17 covers this requirements.

Compliance - 60105(a) States

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

SLR Notes:

PSC issued NPOV 802, -803 and -804.

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

SLR Notes:

Discussed need to improve DC Procedures- discrepancy between DCMR and applicable federal code requirements.

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

SLR Notes:

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

SLR Notes:

Discussed my concern with current pace of Compliance Action and method of resolution. NOPVs 802, 803 and 804. I emphasized that DCMR cannot have

less stringent requirements than federal regulations. It is very likely to hamper and weaken enforcement process. DC PSC to review and find prompt resolution of this deficiency ASAP. DC PSC agreed to keep me informed of resolution

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

SLR Notes:

PSC initiated NOPVs 802 (Dec 21/ 27 2007) , 803 (June 11 2007) and 804 (Jan 28, 2008).

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

SLR Notes:

Discussed with Inspection Procedures- specifically compliance and enforcement process. However thru PSC actions, two NOPVs were summarily dropped due to reference to DCMR requirements (inconsistent with applicable federal code requirements). I express my concern and strongly emphasized that this issue poses a deficiency with proper application of federal code requirements. DCMR must be reviewed to sort out conflicting requirements as a priority item.

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

SLR Notes:

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

SLR Notes:

Discussed with Inspection Procedures- specifically compliance and enforcement process. However thru PSC actions, two NOPVs were summarily dropped due to reference to DCMR requirements (inconsistent with applicable federal code requirements). I express my concern and strongly emphasized that this issue poses a deficiency with proper application of federal code requirements. DCMR must be reviewed to sort out conflicting requirements as a priority item

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

SLR Notes:

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

SLR Notes:

Compliance - 60106(a) States

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

SLR Notes:

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|--|---|---|----|
| 22 | Are results adequately documented demonstrating inspection units were reviewed in accordance with state inspection plan? Previous Question D(2).2 | 1 | NA |
| <small>Yes = 1 No = 0 Needs Improvement = .5</small> | | | |

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

27	Part B: General Comments/Regional Observations	Info Only	Info Only
Info Only = No Points			

SLR Notes:

DC PSC has Natural Gas Program per Section 60105(a) requirements

Total points scored for this section: 21
Total possible points for this section: 24.5



PART C - Interstate Agent States

Points(MAX) Score

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

DC PSC has only Intrastate Natural Gas Program per 60105(a)

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

PART D - Incident Investigations

Points(MAX) Score

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

No Reportable Incidents in CY 2009.

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

SLR Notes:

No Reportable Incidents in CY 2009

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

SLR Notes:

No Reportable Incidents in CY 2009

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

SLR Notes:

No Reportable Incidents in CY 2009

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

SLR Notes:

No Reportable Incidents in CY 2009

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

SLR Notes:

No Reportable Incidents in CY 2009

Total points scored for this section: 1.5
Total possible points for this section: 1.5



PART E - Damage Prevention Initiatives

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? Previous Question B.11
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

PSC has reviewed Local operator Washington Gas (WG) directional drilling procedures to verify that WG takes damage prevention measures to protect underground facilities and assure minimum clearances from other underground facilities and possibility of damages while pull back process for HDD tool.

- | | | | |
|----------|--|---|---|
| 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? New 2008
Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

PSC inspection forms has question to document Miss Utility ticket numbers, date of ticket requested, location of markings. This allows PSC to verify that WG follows damage prevention procedures.

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

SLR Notes:

PSC actively works to enhance damage prevention activities including CGA with WG and various stakeholders.

- | | | | |
|----------|---|---|---|
| 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? New 2008
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

PSC receives and reviews damage data based on per 1000 locate requests.

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

SLR Notes:

PSC reviews WG's incident records, excavation damage data and possibility of recurrence

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

SLR Notes:

PSC was requested to review "Percentage Unaccounted gas" by Washington Gas.

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

PART F - Field Inspection

Points(MAX) Score

1	Operator, Inspector, Location, Date and PHMSA Representative Info Only = No Points Name of Operator Inspected: Washington Gas (WG) Name of State Inspector(s) Observed: Manmohan Singh Location of Inspection: Washington, DC and Springfield, VA Date of Inspection: Dino N.Rathod, P.E. Name of PHMSA Representative:	Info Only	Info Only
----------	---	-----------	-----------

SLR Notes:

Construction- replacement of cast iron main, new service; Critical valves and IMP Status update/ follow-up

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

SLR Notes:

WG Supervisor/ Field inspector was present at both locations.

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

SLR Notes:

Manmohan used Inspection Check List to document his field observations

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

SLR Notes:

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

SLR Notes:

Manmohan reviewed availability of Construction Maps and Procedures, Digital Pyrometer, a level to verify vertical and horizontal alignment of pipe and 90-ell fitting.

6	What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc) New 2008 Info Only = No Points	Info Only	Info Only
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SLR Notes:

Construction/ replacement- Pipe main and service; Critical Valve Maintenance; Gas Transmission IMP Follow-up Review

7	Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) New 2008, comprehensive question worth 2 points total Yes = 2 No = 0 Needs Improvement = 1	2	2
a.	Procedures	<input checked="" type="checkbox"/>	
b.	Records	<input checked="" type="checkbox"/>	
c.	Field Activities/Facilities	<input checked="" type="checkbox"/>	
d.	Other (Please Comment)	<input checked="" type="checkbox"/>	

SLR Notes:

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

SLR Notes:

Manmohan has extensive pipeline safety regulatory experience. In addition, he has completed T&Q Training requirements. He performs his field activities methodically.

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

SLR Notes:

He provided a brief verbal summary of concerns he had at conclusion of field activities.

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

SLR Notes:

He expressed his concern for March 23 construction field activities and requested additional information from WG.

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

SLR Notes:

March 23, 2010 DC PSC Field Evaluation: Replacement Construction

DC PSC Inspector: Manmohan Singh

LDC: Washington Gas (WG)

1903 3rd Street, NW

Washington, DC

Manmohan used Construction Check List and took notes to document construction inspection observations. WG contractor D A Foster crew was in process of installation of a new 7 inch plastic service line to this location. He noted that WG locator Utilquest crew had marked location of gas main based on information provided from WG. Contractor crew excavated to locate gas main but instead found an abandoned 80 inch cast iron main. Contractor crew expressed concern that no other information was available at the time to locate live gas main. Later in afternoon, WG crew was able to locate 6-inch coated steel main about 5 ft from abandoned cast iron main. Lack of up-to-date maps and relevant information for this work (to locator and D A Foster crew and WG field persons) was noted and PSC was to follow-up on this issue.

D A Foster crew inserted about 75 ft of 7 inch med plastic service line (IPS 7 inch, SDR 11, Mfg date- 3 Mar 09). 7 inch weldolet was welded to 6-inch main.

Manmohan conducted a brief Operator Qualification field verification (OQ-9) and reviewed welder qualifications

Location: 18th and T Streets, NW

Washington, DC

Another D A Foster crew was in process of relocating existing cast iron main due to Storm sewer project underway. Manmohan observed installation of 12-inch HDPE and 90-ell. (12-inch HDPE Polypipe, PE 3408, ASTM D 2513, Mfg date: 10 Nov 2009, SDR 13.5). Manmohan observed electro-fusion of a butt-joint and 90-ell. Heating iron temp was being checked with digital pyrometer at multiple locations of heating iron surface. Pipe was stored on wooden blocks. Construction manual copy was also available at job site. He noted possible issue with quality of electrofusion of pipe and 90-ell. D A Foster crew decided to rework heated surfaces with McElroy machine. Manmohan expressed concern with lack of proper alignment of vertical and horizontal.

March 26, 2010 Critical Valves and Follow-up to March 23 Construction

Manmohan reviewed WG Procedures (WG 4062 dated 09/03/2001) and selected records (random selection) to review Maintenance activities and follow-up remedial actions taken by WG field personnel. WG provided a brief overview of their gas distribution system and criteria. One of the factors is to limit number of customers to 1000 or less. WG also works closely with valve maintenance and Dispatchers when any critical valve is found to be inoperable, requiring remedial actions. Other Critical Valves provide capabilities to isolate completely if required and or reduce gas pressure.

Critical Valve Field Maintenance:

22 and N Streets, SW

Washington, DC

WG crew performed annual maintenance of Critical Valve # at the location. Manmohan observed various steps and performed Operator Qualification (OQ # 9). He also asked specific questions for Abnormal Operating Conditions (AOCs). WG crew also provided fire extinguisher near valve prior to starting maintenance activities. Upon completion, valve box was painted with yellow color. No issues were found.

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

SLR Notes:

DC PSC and MD PSC decided to perform joint review of Gas Transmission IMP review of WG. This allows each of them additional level of WG activities for GAS IMP pipelines in MD and DC.

13 Field Observation Areas Observed (check all that apply)

Info Only Info Only

Info Only = No Points

- a. Abandonment
- b. Abnormal Operations
- c. Break-Out Tanks
- d. Compressor or Pump Stations
- e. Change in Class Location
- f. Casings
- g. Cathodic Protection
- h. Cast-iron Replacement
- i. Damage Prevention
- j. Deactivation
- k. Emergency Procedures
- l. Inspection of Right-of-Way
- m. Line Markers
- n. Liaison with Public Officials
- o. Leak Surveys
- p. MOP
- q. MAOP
- r. Moving Pipe
- s. New Construction
- 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

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SLR Notes:

14 Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

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

PART G - PHMSA Initiatives - Strategic Plan

Points(MAX) Score

Risk base Inspections - Targeting High Risk Areas

- 1** Does state have process to identify high risk inspection units? 1.5 1.5
Yes = 1.5 No = 0

Risk Factors (criteria) to consider may include:

Miles of HCA's, Geographic area, Population Density

Length of time since last inspection

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

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

SLR Notes:

PSC has performed review of WG's intrastate transmission lines- about 30 miles total; PSC also requires consideration for high risks, high consequence areas (HCAs) and Natural Gas Quality Service Stds (NGQSS) per Section 3705. Examples- Remedial measures for Dead Ends, vintage mechanical coupling replacement -Hexane injection proceedings

- 2** Are inspection units broken down appropriately? (see definitions in Guidelines) .5 0.5
Yes = .5 No = 0

SLR Notes:

Washing Gas has four quadrants and it's HQ in Springfield as part of Inspection Unit- (See 2010 Certification Attachment 1).

- 3** Consideration of operators DIMP Plan? (if available and pending rulemaking) Info Only Info Only
Info Only = No Points

SLR Notes:

PSC is closely working with WG and monitoring DIMP implementation activities.

- 4** Does state inspection process target high risk areas? .5 0.5
Yes = .5 No = 0

SLR Notes:

PSC targets high risk areas based on construction activity plans; location sheets, leak/odor survey data including IMP HCA determination consideration details etc. PSC also pays close attention to damage data received.

Use of Data to Help Drive Program Priority and Inspections

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

SLR Notes:

PSC reviews damage data from WG and data on Miss Utility tickets. (Example 2009 One Call Project Report)

- 6** Has state reviewed data on Operator Annual reports for accuracy? .5 0.5
Yes = .5 No = 0

SLR Notes:

PSC reviews WG Annual Reports for accuracy, complete and consistent data

- 7** Has state analyzed annual report data for trends and operator issues? .5 0.5
Yes = .5 No = 0

SLR Notes:

PSC reviews WG Annual Reports for accuracy, complete and consistent data including possible trends.

- 8** Has state reviewed data on Incident/Accident reports for accuracy? .5 0.5
Yes = .5 No = 0

SLR Notes:

PSC reviews WG Incident Reports for accuracy, complete and consistent data.

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

SLR Notes:

PSC prepared NGQSS rules for Performance Measures. WG provides Monthly data to PSC. This is reviewed to evaluate effectiveness of Gas Pipeline Safety Program.

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

SLR Notes:

PSC completed 13 OQ inspections and uploaded in OQDB.

11	Did the State submit their replies into the Integrity Management Database (IMDB) in response to the Operators notifications for their integrity management program? Previous Question B.16	.5	NA
Yes = .5 No = 0			

SLR Notes:

Review of data indicated that WG has not made notification in IMDB

12	Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17	.5	0.5
Yes = .5 No = 0			

SLR Notes:

PSC uploaded federal protocol in IMDB.(Nov 2009)

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

SLR Notes:

PSC has asked WG for any plastic pipe/ components for defects leaks. No issues have been found by WG.

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

SLR Notes:

PSC confirmed with NPMS and an update to website.

Accident/Incident Investigation Learning and Sharing Lessons Learned

15	Has state shared lessons learned from incidents/accidents? (i.e. NAPSIR meetings and communications)	.5	0.5
Yes = .5 No = 0			

SLR Notes:

PSC presented at NAPSIR ER Mtg. in Essex, VT. in Jul 2009.

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

SLR Notes:

PSC supports and shares incident related PHMSA Bulletins and requires incident reports/ specific details from WG.

17	Does state have incident/accident criteria for conducting root cause analysis?	Info Only	Info Only
Info Only = No Points			

SLR Notes:

PSC requires appropriate Root Cause analysis for incidents that meet NGQSS and Reportable to NRC (DOT requirement)

18 Does state conduct root cause analysis on incidents/accidents in state?

Info Only Info Only

Info Only = No Points

SLR Notes:

PSC requires appropriate Root Cause analysis for incidents that meet NGQSS and Reportable to NRC (DOT requirement)

19 Has state participated on root cause analysis training? (can also be on wait list)

.5

0.5

Yes = .5 No = 0

SLR Notes:

U. Ogbue completed Root Cause Analysis training in Feb 2010

Transparency - Communication with Stakeholders

20 Other than pipeline safety seminar does State communicate with stakeholders? (Communicate program data, pub awareness, etc.)

.5

0.5

Yes = .5 No = 0

SLR Notes:

PSC communication via website for Pipeline Safety related data, Public Awareness. In April 2010 National safe Digging Month in collaboration with NAPSRS, 811

21 Does state share enforcement data with public? (Website, newsletters, docket access, etc.)

.5

0.5

Yes = .5 No = 0

SLR Notes:

DC PSC has Docket Access to Commission's enforcement records. Example: PSC posted the Master Plan directing WG to prepare and implement as part of the Settlement Agreement for replacement/ encapsulation of leaking mech couplings in their distribution system.

22 Part G: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

Total points scored for this section: 9.5
Total possible points for this section: 9.5



PART H - Miscellaneous

Points(MAX) Score

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

SLR Notes:

1. PSC directed WG as part of the Settlement Agreement to implement replacement /encapsulation of leaking mechanical couplings.
2. Attended NAPSR ER and CAMP NARUC at Michigan State Univ
- PSC participated in PHMSA and NAPSR survey requests- state enforcement and Civil Penalty.

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

SLR Notes:

- 1 PSC working closely with WG for on-going efforts for DIMP implementation.
- 2 PSC working to finalize civil penalty matrix for pipeline safety violations.
- 3 PSC initiated collaboration with DDOT, WGL and PEPCO for enhance damage prevention for utility construction and maintenance projects.

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

SLR Notes:

- 3rd party damage reductions-
- 1 dead end remediation project; directed WG to provide a Master Plan for replacement / encapsulation of mech couplings.
- 2 2005-2009 review of damage data: 3.53 /1000 in 2005; 2.99/1000 in 2009- Shows a downward trend

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

SLR Notes:

PSC participated and sent replies to NAPSR surveys - Three year waiver, Damage Prevention Characterization Tool Exercise

- | | | | |
|----------|---|----|-----|
| 5 | Sharing Best Practices with Other States - (General Program)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

PSC shared at NAPSR ER Mtg

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

SLR Notes:

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

PART I - Program Initiatives

Points(MAX) Score

Drug and Alcohol Testing (49 CFR Part 199)

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

SLR Notes:

PSC performed D&A inspections and used Inspection forms
EN-10- D&QA Records review
EN-11 Contractor D&Q Program
EN-35. Comprehensive Drug Prog.
Example: WG contractor D A Foster has 100 % employees in D&A Program

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

SLR Notes:

PSC conducted D&A inspections using forms EN-10, EN-11 and EN-35 (see I-1 response) and reviewed random drug testing.

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

SLR Notes:

PSC's only operator WG has "zero tolerance policy". Persons with positive test results are removed from performing covered tasks.

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

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

SLR Notes:

PSC used federal OQ Protocols 1 thru 9. PSC also reviewed WG OQ Plan

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

SLR Notes:

PSC used federal OQ Protocols 1 thru 9. PSC also reviewed WG OQ Plan

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

SLR Notes:

PSC used federal OQ Protocol 9. PSC also reviewed field verification of persons performing covered tasks per WG's OQ Plan

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

SLR Notes:

PSC used federal OQ Protocols 1 thru 9. PSC also reviewed WG OQ Plan

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

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

SLR Notes:

PSC used federal IMP Protocols A thru N. PSC also reviewed WG IMP Plan

- | | | | |
|----------|---|----|-----|
| 9 | Has the state verified that in determining whether a plan is required, the operator correctly calculated the potential impact radii and properly applied the definition of a high consequence area? | .5 | 0.5 |
|----------|---|----|-----|

Yes = .5 No = 0

SLR Notes:

PSC used federal IMP Protocols A thru N. PSC also reviewed WG IMP Plan and HCA determination -all 20 miles of transmission pipeline is consided in HCA.

- | | | | |
|-----------|--|----|-----|
| 10 | Has the state reviewed operator IMPs for compliance with Subpart O? (In accordance with State Inspection plan) | .5 | 0.5 |
|-----------|--|----|-----|

Yes = .5 No = 0

SLR Notes:

PSC used federal IMP Protocols A thru N. PSC also reviewed WG IMP Plan

- | | | | |
|-----------|---|----|-----|
| 11 | Is the state monitoring operator progress on the inspections, tests and remedial actions required by the operator's IMP, including that they are being done in the manner and schedule called for in its IMP? | .5 | 0.5 |
|-----------|---|----|-----|

Yes = .5 No = 0

SLR Notes:

PSC used federal IMP Protocols A thru N. PSC also reviewed WG IMP Plan Nov 23, 2009 and Dec 04, 2009

- | | | | |
|-----------|---|----|-----|
| 12 | Is the state verifying that operators are periodically examining their transmission line routes for the appearance of new HCAs? | .5 | 0.5 |
|-----------|---|----|-----|

Yes = .5 No = 0

SLR Notes:

WG has entire 20+ miles within HCA

Public Awareness (49 CFR Section 192.616)

- | | | | |
|-----------|---|----|-----|
| 13 | Has the state verified that each operator has developed a continuing public awareness program? (due date was 6/20/06 for most operators, 6/20/07 for certain very small operators, 6/13/08 for master meters) | .5 | 0.5 |
|-----------|---|----|-----|

Yes = .5 No = 0

SLR Notes:

PSC performed Public Awareness (PA) inspection in Dec 12, 2006. Susequently PSC has also performed PA inspection in 2009.

- | | | | |
|-----------|---|----|-----|
| 14 | Has the state reviewed the content of these programs for compliance with 192.616 (by participating in the Clearinghouse or by other means)? | .5 | 0.5 |
|-----------|---|----|-----|

Yes = .5 No = 0

SLR Notes:

PSC participated in the clearinghouse and performed Public Awareness (PA) inspection in Dec 12, 2006. Susequently PSC has also performed PA inspection in 2009

- | | | | |
|-----------|---|----|-----|
| 15 | Is the state verifying that operators are conducting the public awareness activities called for in its program? | .5 | 0.5 |
|-----------|---|----|-----|

Yes = .5 No = 0

SLR Notes:

PSC performed Public Awareness (PA) inspection in Dec 12, 2006. Susequently PSC has also performed PA inspection in 2009

- | | | | |
|-----------|--|-----------|-----------|
| 16 | Is the state verifying that operators have evaluated their Public Awareness programs for effectiveness as described in RP1162? | Info Only | Info Only |
|-----------|--|-----------|-----------|

Info Only = No Points

SLR Notes:

PSC performed Public Awareness (PA) inspection in Dec 12, 2006. Susequently PSC has also performed PA inspection in 2009

- | | | | |
|-----------|--|-----------|-----------|
| 17 | Part I: General Comments/Regional Observations | Info Only | Info Only |
|-----------|--|-----------|-----------|

Info Only = No Points

SLR Notes:

PSC performed Public Awareness (PA) inspection in Dec 12, 2006. Susequently PSC has also performed PA inspection in 2009

Total points scored for this section: 9

Total possible points for this section: 9