



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

1200 New Jersey Avenue SE
Washington DC 20590

2011 Natural 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)



2011 Natural Gas State Program Evaluation -- CY 2011
Natural Gas

State Agency: District of Columbia

Agency Status:

Date of Visit: 04/30/2012 - 06/27/2012

Agency Representative: Udeozo Ogbue

PHMSA Representative: Dinubhai (Dino) N. Rathod

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

Name/Title: Ms. Betty Ann Kane, Chairman

Agency: Public Service Commission of District of Columbia

Address: 1333 H Street

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 2011 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. A deficiency in any one part of a multiple part question should be scored as needs improvement. Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual progress report attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART G):

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

Scoring Summary

PARTS

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)

Possible Points Points Scored

9	9
15	15
43	40
14	11
3	3
8	8
11	11
0	0
1	0

TOTALS

104 97

State Rating 93.3

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

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

Evaluator Notes:

DC has only one LDC- Washington Gas

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

Evaluator Notes:

I discussed with Attachment 2- PSC reported 183 inspection person days for CY 2011. and expressed concern both inspectors inspection time in "Joint inspections" for extended period of time since 2009. PHMSA wrote to PSC requesting a prompt resolution, however PSC failed to address underlying issues. I emphasized and asked for prompt resolution for each inspector can perform inspection activity independently to make use of time efficiently. Subsequently in July 2012, PSC indicated that a second vehicle was requested for another inspector. PSC was requested to keep us advised of progress.

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

Evaluator Notes:

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

Evaluator Notes:

No federally reportable incidents-None reported in CY 2011.

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

Evaluator Notes:

I discussed with PSC need for strong and consistent enforcement of pipeline safety regulations including use of civil penalties, as appropriate. We have expressed concern for downward trend and strong commitment to immediately address lack of viable progress.

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

Evaluator Notes:

PSC maintains a combination of hard copy and electronic files. Files are easily accessible.

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

Evaluator Notes:

Issue of completion of "Required T&Q training for A. Bagayoko and the Program Manager. I discussed PHMSA's T&Q training course requirements and specifics described in Guideline Manual Chapter 4. I requested and subsequently received the PSC's detailed plan of action with Courses Accepted, Coursed Wait-Listed" for each one of you and indicate anticipated time-line to meet T&Q training completion requirements.

- | | | | |
|----------|--|---|---|
| 8 | Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8 (A1h) | 1 | 1 |
|----------|--|---|---|



Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

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

Evaluator Notes:

PSC continues to monitor CI /bare steel repalcement, corrosion protection.

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

Evaluator Notes:

Discussed with Mr Udeozo- Prog Mgr. several unresolved pending issues and requested PSC to make a firm commitment to resolve. I urged the Prog Mgr to move forward with proper solutions and willingness to take immediate and necessary actions. Failure to take necessary steps has a direct negative impact on this evaluation process and final score.

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



PART B - Program Inspection Procedures

Points(MAX) Score

1 Standard Inspections (B1a)

2

2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

2 IMP Inspections (including DIMP) (B1b)

1

1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

3 OQ Inspections (B1c)

1

1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

4 Damage Prevention Inspections (B1d)

1

1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

5 On-Site Operator Training (B1e)

1

1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

6 Construction Inspections (B1f)

1

1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

7 Incident/Accident Investigations (B1g)

2

2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

8 Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? (B2a-d, G1,2,4)

6

6

Yes = 6 No = 0 Needs Improvement = 1-5

a. Length of time since last inspection

Yes ☒ No ☐ Needs Improvement ☐

b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)

Yes ☒ No ☐ Needs Improvement ☐

c. Type of activity being undertaken by operators (i.e. construction)

Yes ☒ No ☐ Needs Improvement ☐

d. Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc)

Yes ☒ No ☐ Needs Improvement ☐

e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors)

Yes ☒ No ☐ Needs Improvement ☐

f. Are inspection units broken down appropriately?

Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

DC PSC inspects Washington Gas (Intrastate Gas operator). PSC takes into account WG's O&M and incident history, physical geography of DC and population density etc.

9 General Comments:

Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

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



PART C - Program Performance

Points(MAX) Score

- 1 Was ratio of Total Inspection person-days to total person days acceptable? (Director of State Programs may modify with just cause) Chapter 4.3 (A12) 5 5
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):
183.00

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
183.00 / 440.00 = 0.42

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

Evaluator Notes:

Discussed with PSC an unresolved issue of on-going joint inspections by both inspectors (was pointed out in DC Chair's letter Sept 2011). We expect each inspector to start performing independent inspection activities based on pipeline safety experience, mentoring by senior inspector and ability exhibited by a new inspector. It is essential to utilize inspection resources in very efficient manner. In certain specific situations, joint inspections may be justifiable. We urge the PSC to tackle underlying issue of ability of each inspector to visit LDC locations without hinderance(inspection vehicle not available to each inspector). PSC to notify ER State Liaison and State Programs Director on workable permanent resolution of this un-resolved issue promptly to avoid loss of points.

- 2 Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines for requirements) Chapter 4.4 (A8-A11, G19) 5 5
Yes = 5 No = 0 Needs Improvement = 1-4

- | | | | |
|---|--------------------------------------|--------------------------|---|
| a. Completion of Required OQ Training before conducting inspection as lead? | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. Completion of Required DIMP*/IMP Training before conducting inspection as lead? *Effective Evaluation CY2013 | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. Root Cause Training by at least one inspector/program manager | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. Note any outside training completed | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

- 3 Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1 (A5) 2 1
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Mr Udeozo joined PSC in Sept 2007 and was named Program Manager. By end of CY 2011, he had only completed three (3) courses successfully. Major portion of course completion requirement is unlikely to be met within required timeline. It is essential to have necessary training completed successfully to be effective Program Manager. I emphasized need for the Program Manager Udeozo to complete required T&Q courses as described in State Guideline Manual Chapters 4 and 5.

- 4 Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1 (A6-7) 2 1
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Chairman Letter - Items 4 & 5 : DCMR Chapter 15-23 did not get finalized and PSC has indicated that rules are likely to become final shortly. This apparent delay is impacting timely implementation of Rules. PSC agreed to help resolve it ASAP.

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

Evaluator Notes:

CY 2010 DC and MD PSC hosted a joint T&Q seminar. PSC intends to host it in CY 2012.

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

Evaluator Notes:

PSC has inspected operator in accordance with Written Procedures.

- | | | | |
|---|---|---|---|
| 7 | Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1 (B4-5)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|
-

Evaluator Notes:

DC PSC uses federal inspection form and state inspection check lists. PSC routinely perform review and revise, when necessary

- | | | | |
|---|--|---|---|
| 8 | Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Chapter 5.1 (B7)
Yes = 1 No = 0 | 1 | 1 |
|---|--|---|---|
-

Evaluator Notes:

PSC inspected and reviewed WG Procedure #4078.

- | | | | |
|---|---|---|---|
| 9 | Did the state review operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance) (NTSB) Chapter 5.1 (B8)
Yes = 1 No = 0 | 1 | 1 |
|---|---|---|---|
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Evaluator Notes:

PSC inspected and reviewed WG Procedure #4083

- | | | | |
|----|--|---|---|
| 10 | Did the state review operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21? (NTSB) Chapter 5.1 (B9)
Yes = 1 No = 0 | 1 | 1 |
|----|--|---|---|
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Evaluator Notes:

PSC inspected and reviewed WG Procedure #1040 & 3220

- | | | | |
|----|---|---|---|
| 11 | Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 192.617? Chapter 5.1 (B10,E5)
Yes = 1 No = 0 | 1 | 1 |
|----|---|---|---|
-

Evaluator Notes:

PSC reviews WG records of previous incidents & failures.

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

CY 2011 DC PSC reviewed Washington Gas- Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends

- 13 Did state input all applicable OQ, IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1 (G10-12) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Dc conducted 15 OQ inspections and uploaded in OQDB; In addition DC PSC performed IMP inspection of WG in Nov 2009 and uploaded completed IMP inspection in IMDB

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

Evaluator Notes:

DC PSC May 2012 confirmed intrastate transmission operators have submitted information into NPMS database

- 15 Is the state verifying operators are conducting drug and alcohol tests as required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199 (I1-3) 2 1
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

DC PSc conducted D&A inspection of WG in June 2011. I pointed out that PHMSA D&A updated forms are available from PHMSA weblink and PSC should consider using these documents.

- 16 Is state verifying operators OQ programs are up to date? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals determined in the operators plan. 49 CFR 192 Part N (I4-7) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

CY 2011 DC PSC conducted 15 OQ inspections. OQ Program Plan reviewed in CY 2009

- 17 Is state verifying operator's gas transmission integrity management programs (IMP) are up to date? This should include a previous review of IMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart 0 (I8-12) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

DC PSC conducted IMP inspection in April 2009

- 18 Is state verifying operator's gas distribution integrity management Programs (DIMP)? Info Only Info Only
This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart P
Info Only = No Points

Evaluator Notes:

DC has closely monitored DIMP Plan and Procedures and provided feed back to WG.

- 19 Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. 49 CFR 192.616 (I13-16) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

DC SPC conducted PA inspection and reviewed WG Public Awareness Plan Updates June 2011.

- 20** Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public). (G20-21) 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Weblink <http://www.dcpsec.org>

E-Docket System allows access to various dockets. DC PSC also communicate with various stakeholders. Enforcement cases are available to public.

- 21** Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 (B6) 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

NO SRC in CY 2011

- 22** Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns? (G13) 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

DC PSC contacted WG for plastic pipe and components -any possible defects. WG indicated non as they know.

- 23** Did the state participate in/respond to surveys or information requests from NAPSRS or PHMSA? (H4) 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

DC SPC actively participated in NAPSRS and PHMSA initiative and survey requests (dated April 10, 2012) Suspension Request for 2011 End of Year Reimbursements.

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

Evaluator Notes:

Total points scored for this section: 40
Total possible points for this section: 43



PART D - Compliance Activities

Points(MAX) Score

- 1** Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1 (B12-14, B16, B1h) 4 3
Yes = 4 No = 0 Needs Improvement = 1-3
- a. Procedures to notify an operator (company officer) when a noncompliance is identified Yes ☒ No ☐ Needs Improvement ☐
- b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

During my June 2012 Program Evaluation trip, DC PSC was still waiting for changes to DCMR finalized. Discussed unresolved issue of DCMR and need for procedures to be reviewed and revised for a strong, fair and consistent enforcement resulting in compliance actions in a timely manner. Subsequently DC PSC indicated that DCMR was published on Jul 20, 2012.

- 2** Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1 (B11,B18,B19) 4 3
Yes = 4 No = 0 Needs Improvement = 1-3
- a. Were compliance actions sent to company officer or manager/board member if municipal/government system? Yes ☐ No ☐ Needs Improvement ☐

Evaluator Notes:

I discussed emphasized need for maintaining all supporting documentation and make it available for annual audit review. CY 2011- no probable violations were found by PSC.

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

Evaluator Notes:

DC finalized changes to DCMR Jul 2012. Review of past 5 years Enforcement Actions indicated a downward trend in strong compliance activities (2007 thru 2011). Discussed with PSC need for procedures to be reviewed and streamlined/simplified. PSC Pipeline Safety and Legal staff need to work together early on. The PSC should revise internal Compliance Procedures for a strong, fair and consistent enforcement resulting in compliance actions in a timely manner.

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

Evaluator Notes:

- 5** Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken) (B27) 2 1
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Discussed with PSC need for procedures to be reviewed and revised for a strong, fair and consistent enforcement resulting in compliance actions in a timely manner. PSC will consider imposing civil penalties, as appropriate and necessary per finalized version of DCMR ASAP.

- 6** Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations? (new question) Info Only Info Only
Info Only = No Points

Evaluator Notes:

PSC record for finding NOPVs and taking enforcement action and appropriate compliance actions including use of civil penalties is not consistent. This has been discussed with PSC staff and they agreed to resolve this issue ASAP. Review of 2009-2011 indicated that DC did not impose any Civil Penalties in this period.

7 General Comments:

Info Only = No Points

Evaluator Notes:

Info OnlyInfo Only

Total points scored for this section: 11
Total possible points for this section: 14



PART E - Incident Investigations

Points(MAX) Score

- 1 Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? And did state keep adequate records of Incident/Accident notifications received? Chapter 6 (A2,D1-3) 2 2
Yes = 2 No = 0 Needs Improvement = 1

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

Evaluator Notes:

PSC has achieved successful integration of DC PSC's telephone and e-mail system for the retrieval of WGL's Gas Leak, Odor, Incident Reports, and other utility safety program performance data was accomplished with a system called CISCO Unified Messaging Platform

- 2 If onsite investigation was not made, did state obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 (D4) 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No Reportable incidents in 2011

- 3 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? (D5) 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:

No reportable incidents in CY 2011

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

Evaluator Notes:

- 5 Did the state assist region office by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 (D7) 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

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

Evaluator Notes:

PSC shared at ER meeting in June 2012

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

Evaluator Notes:

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



PART F - Damage Prevention

Points(MAX) Score

- | | | | |
|---|---|---|---|
| 1 | Has the state reviewed directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies? NTSB (E1)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

PSC has reviewed directional drilling/boring procedures of WGL. Procedure 5250 & 5252

- | | | | |
|---|--|---|---|
| 2 | Did the state inspector check to assure the pipeline operator is following its written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? (E2)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

DC PSC checked procedures as part of O& M review. WG is a memebr of Miss Utility in DC

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|---|---|---|---|
| 3 | Did the state encourage and promote practices for reducing damages to all underground facilities to its regulated companies? (i.e. such as promoting/adopting the CGA Best Practices encouraging adoption of the 9 Elements, etc.) (E3)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

DC actively promoted 811 Call Before You Dig including a Proclamation by DC Mayor in April 2012

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|---|--|---|---|
| 4 | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests? (This can include DIRT and other data shared and reviewed by the pipeline safety program) (E4,G5)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

DC PSC analyzes Damage data each year for trend.

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

Evaluator Notes:

DC has not viable One Call Enforcement. PHMSA has emphasized for strong enforcement of One call violations for all stakeholder. This issue has remained unresolved for a long time

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

PART G - Field Inspections

Points(MAX) Score

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

Name of Operator Inspected:

Washington Gas

Name of State Inspector(s) Observed:

Manmohan Singh

Location of Inspection:

WGL -HQ, Springfield, VA and Washington, DC

Date of Inspection:

04/30/2012; 05/01/2012; 05/03/2012

Name of PHMSA Representative:

Dinubhai (Dino) Rathod

Evaluator Notes:

1. A joint DC+MD PSC Follow-up/ review of DIMP and PAPE at WGL HQ 04/30/2012

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

Evaluator Notes:

- WG was notified and personnel were present.

- | | | | |
|---|--|---|---|
| 3 | Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) (F3)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

- PSC inspector used PHMSA inspection forms (DIMP+PAPE).

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

Evaluator Notes:

- PSC inspector used inspection form/ check list and documented his observations

- | | | | |
|---|---|---|---|
| 5 | Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps, pyrometer, soap spray, CGI, etc.) (F5)
Yes = 1 No = 0 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

- | | | | |
|---|---|-------------------------------------|---|
| 6 | Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) (F7)
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 checked="" type="checkbox"/> | |

Evaluator Notes:

- 1 Joint DIMP+PAPE Follow-up inspection. PSC staff reviewed an update to previously conducted DIMP+PAPE inspections.
2. Construction- Sherman Ave & Irving St, NW, Washington St.
3. Valve Maintenance Inspection-12th and M St, SE, Washington, DC

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

Evaluator Notes:

- | | | | |
|---|--|---|---|
| 8 | Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) (F9)
Yes = 1 No = 0 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

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

Evaluator Notes:

PSC inspector did not find any probable violations. However, inspector conducted a brief exit interview

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

- | | | |
|----|-----------------------------------|-------------------------------------|
| a. | Abandonment | <input type="checkbox"/> |
| b. | Abnormal Operations | <input type="checkbox"/> |
| c. | Break-Out Tanks | <input type="checkbox"/> |
| d. | Compressor or Pump Stations | <input type="checkbox"/> |
| e. | Change in Class Location | <input type="checkbox"/> |
| f. | Casings | <input type="checkbox"/> |
| g. | Cathodic Protection | <input type="checkbox"/> |
| h. | Cast-iron Replacement | <input type="checkbox"/> |
| i. | Damage Prevention | <input type="checkbox"/> |
| j. | Deactivation | <input type="checkbox"/> |
| k. | Emergency Procedures | <input type="checkbox"/> |
| l. | Inspection of Right-of-Way | <input type="checkbox"/> |
| m. | Line Markers | <input type="checkbox"/> |
| n. | Liaison with Public Officials | <input type="checkbox"/> |
| o. | Leak Surveys | <input type="checkbox"/> |
| p. | MOP | <input type="checkbox"/> |
| q. | MAOP | <input type="checkbox"/> |
| r. | Moving Pipe | <input type="checkbox"/> |
| s. | New Construction | <input 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 type="checkbox"/> |
| A. | Repairs | <input type="checkbox"/> |
| B. | Signs | <input type="checkbox"/> |
| C. | Tapping | <input type="checkbox"/> |
| D. | Valve Maintenance | <input checked="" type="checkbox"/> |
| E. | Vault Maintenance | <input type="checkbox"/> |

- | | | |
|----|-----------------------------|-------------------------------------|
| F. | Welding | <input type="checkbox"/> |
| G. | OQ - Operator Qualification | <input type="checkbox"/> |
| H. | Compliance Follow-up | <input type="checkbox"/> |
| I. | Atmospheric Corrosion | <input type="checkbox"/> |
| J. | Other | <input checked="" type="checkbox"/> |

Evaluator Notes:

- 1 DIMP+PAPE Follow-up review.
2. Observe Service line relocation -replace exist 1 1/4 pipe and relocate due to new storm drain catch basin construction on Sherman Ave.
3. Observe Valve maintenance at 12 th and M St, SE

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



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

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

Evaluator Notes:

DC PSC is not an interstate agent

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

Evaluator Notes:

DC PSC is not an interstate agent. DC has only one intrastate LDC- Washington Gas.

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

Evaluator Notes:

DC PSC is not an interstate agent

- | | | | |
|----------|--|---|----|
| 4 | Were probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) (C4)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

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

Evaluator Notes:

DC PSC is not an interstate agent

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

Evaluator Notes:

DC PSC is not an interstate agent

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

Evaluator Notes:

- | | | | |
|----------|--|-----------|-----------|
| 8 | General Comments:
Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

DC PSC 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**

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

Evaluator Notes:

DC PSC is not an Agreement state(60106).

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

Evaluator Notes:

DC PSC is not an Agreement state(60106).

- | | | | |
|----------|---|---|----|
| 3 | Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) (B23)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

DC PSC is not an Agreement state(60106).

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

Evaluator Notes:

DC PSC is not an Agreement state(60106).

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

Evaluator Notes:

DC PSC is not an Agreement state(60106).

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

Evaluator Notes:

DC PSC is not an Agreement state(60106).

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

Evaluator Notes:

DC PSC is not an Agreement state(60106).

Total points scored for this section: 0
Total possible points for this section: 1