



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

1200 New Jersey Avenue SE
Washington DC 20590

2010 Natural Gas State Program Evaluation

for

MARYLAND PUBLIC SERVICE COMMISSION

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



2010 Natural Gas State Program Evaluation -- CY 2010
Natural Gas

State Agency: Maryland

Agency Status:

Date of Visit: 04/12/2011 - 04/29/2011

Agency Representative: John Clementson

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

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

Name/Title: Mr. Douglas Nazarian, Chairman

Agency: Maryland Public Service Commission

Address: 6 St Paul Street

City/State/Zip: Baltimore, Maryland 21202-6806

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 2010 (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

Possible Points Points Scored

A	General Program Qualifications	26	25
B	Inspections and Compliance - Procedures/Records/Performance	24.5	23
C	Interstate Agent States	0	0
D	Incident Investigations	7	7
E	Damage Prevention Initiatives	9	9
F	Field Inspection	11	11
G	PHMSA Initiatives - Strategic Plan	9.5	9
H	Miscellaneous	3	3
I	Program Initiatives	9	9

TOTALS

99 96

State Rating **97.0**

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 | 7 |
| <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:

Minor corrections

Attachment 1- LNG Jurisdiction (intrastate)- PSC to review and revise: Yes/60105

Attachment 8 Item- 1. Indicated as Date of automatic adoption 10/1999. Currently shown limits became effective much later.

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

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

PSC hosted T&Q seminar May 5-7, 2010 in 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 maintains computerized data as well hard copies; These are easily accessible

- | | | | |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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 | 2 |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

SLR Notes:

John Clementson has extensive pipeline regulatory experience. He has completed T&Q training. He provides guidance to PSC inspection staff. He works closely with PHMSA and NAPSRS.

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

yes; PSC responded to Chairman letter within 60 days.

- | | | | |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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 | 1 | 1 |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Yes = 1 No = 0

SLR Notes:

PSC is working with damage prevention enhancement and re-write of Miss Utility Law. No final outcome is expected anytime soon.

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 | 3 | 3 |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Yes = 3 No = 0

SLR Notes:

Yes.

-
- | | | | |
|----------|--------------------------------------------------|-----------|-----------|
| 9 | Brief Description of Non-TQ training Activities: | Info Only | Info Only |
|----------|--------------------------------------------------|-----------|-----------|

Info Only = No Points

For State Personnel:

For Operators:

For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:

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 | 1 | 1 |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Yes = 1 No = 0

SLR Notes:

-
- | | | | |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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 | 1 | 1 |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Yes = 1 No = 0

SLR Notes:

-
- | | | | |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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 | 5 | 5 |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):

448.30

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

220 X 3.71 = 816.20

Ratio: A / B

448.30 / 816.20 = 0.55

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

Points = 5

SLR Notes:

-
- | | | | |
|-----------|---------------------------------------------------------------------------------------------------------------------------|-----------|-----------|
| 13 | Have there been modifications or proposed changes to inspector-staffing levels? (If yes, describe) Previous Question B.13 | Info Only | Info Only |
|-----------|---------------------------------------------------------------------------------------------------------------------------|-----------|-----------|

Info Only = No Points

SLR Notes:

In April 2011 Inspector Kalu Emeaba resigned and left PSC. PSC initiated plans to fill this vacancy. PSC may make final selection shortly.

14 Part-A General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

Total points scored for this section: 25
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 6.5
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 checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

SLR Notes:

- 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 1.5
Yes = 2 No = 0 Needs Improvement = 50% Deduction
- | | | | | |
|---|------------------------------------------------------------------------------------------------|---------------------------|-------------------------------------|-----------------------------------------|
| a | Length of time since last inspection | Yes <input type="radio"/> | No <input checked="" type="radio"/> | Needs Improvement <input type="radio"/> |
| b | History of Operator/unit and/or location (including leakage , incident and compliance history) | Yes <input type="radio"/> | No <input checked="" type="radio"/> | Needs Improvement <input type="radio"/> |
| c | Type of activity being undertaken by operator (construction etc) | Yes <input type="radio"/> | No <input checked="" type="radio"/> | Needs Improvement <input type="radio"/> |
| d | For large operators, rotation of locations inspected | Yes <input type="radio"/> | No <input checked="" type="radio"/> | Needs Improvement <input type="radio"/> |

SLR Notes:

PSC will review and revise Written Inspection procedures and include above items to address "Risk Based Inspection Process".

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 1
Yes = 1 No = 0

SLR Notes:

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

SLR Notes:

Discussed with PSC need for filling in necesasry inspection details and have it done consistently by all inspection staff.

- 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 reported in CY 2010

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 Yes = .5 No = 0	.5	.5
----------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----	----

SLR Notes:

PSC inspection form EN-16, Exposed Pipe Part 192.459

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 Yes = .5 No = 0	.5	.5
----------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----	----

SLR Notes:

PSC inspection Check List EN-16 Protecting cast iron Part 192.755

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 Yes = .5 No = 0	.5	.5
----------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----	----

SLR Notes:

PSC inspection form E-16 covers review of Emergency Plan procedures

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

SLR Notes:

Compliance - 60105(a) States

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

in CY 2010 PSC found 55 probable Violations

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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 Yes = .5 No = 0	.5	.5
-----------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----	----

SLR Notes:

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

SLR Notes:

Compliance - 60106(a) States

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

SLR Notes:

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

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

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

27	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) Info Only = No Points	Info Only	NA
----	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------	----

SLR Notes:

28	Part B: General Comments/Regional Observations Info Only = No Points	Info Only	NA
----	-------------------------------------------------------------------------	-----------	----

SLR Notes:

Total points scored for this section: 23
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:

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 | 1 |
|----------|----------------------------------------------------------------------------------------------------------------------------------------|---|---|

SLR Notes:

- | | | | |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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 | 1 |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

SLR Notes:

- | | | | |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------------------------|
| 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 | 2 |
| a. | Observations and Document Review | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. | Contributing Factors | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| c. | Recommendations to prevent recurrences where appropriate | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

SLR Notes:

- | | | | |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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 | 1 |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

SLR Notes:

- | | | | |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|
| 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 | 0.5 |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|

SLR Notes:

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

SLR Notes:

Total points scored for this section: 7
Total possible points for this section: 7



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 had requested the LDC's Directional Drilling/Boring procedures back in October 2008. The procedures were reviewed for damage prevention actions for their facilities as well as the facilities of other utilities. They were also reviewed to see if the procedures called for a "swivel and a weak link" during the pull-back process

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

2) MD PSC has plastic pipe and steel main construction inspection forms (EN-33 and EN-34) have a space for the Miss Utility ticket number, the date it was called in on and the date the excavation started. PSC inspector also verifies compliance with LDCs 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:

At several GOAC (Gas Operators Advisory Committee) meetings MD -PSC has stressed the need for the pipeline operators to adopt and follow the CGA's Best Practices document. The CGA Best Practice document was also used by the stakeholder group when it revised the "Miss Utility" law in MD

- | | | | |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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 requested the LDC's Damages per Thousand Locate Tickets for years 2006 thru 2010. PSC also reviews data for possible trends. The Engineering Division also requested the number of damages according to the three following categories;

- ? Failure to call Miss Utility,
- ? Damage occurred as a result of an error made by the operator, and
- ? Damage occurred even though the utility was marked correctly.

- | | | | |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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 responds to reports of possible incidents and works closely with LDCs for excavation damages.

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

SLR Notes:

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 | Info Only | Info Only |
|----------|---------------------------------------------------------------------------------------|-----------|-----------|

Name of Operator Inspected:

Washington Gas (WGL); BG&E

Name of State Inspector(s) Observed:

R.K.Amroliwala; J. Clementson and A Jaiyeola

Location of Inspection:

Springfield, Va and Baltimore,MD

Date of Inspection:

04/12/2011; 4/21/2011

Name of PHMSA Representative:

Dino N. Rathod, P.E.

SLR Notes:

Multilpe field activities at various locations

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

LDC Reps were present for various planned field evaluation activities

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

PSC inspectors used State Inspection check List(s) and PHMSA Protocol form for OQ# 9 Field Verification activities.

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

- | | | | |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|
| 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 |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|

SLR Notes:

DIMP Implementation Status review; Pipe Repalcement with new plastic pipe; Discuss PHMSA advisories etc (San Bruno, Ca incident)

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

PSC inspectors have completed required T&Q training and have demonstrated adequate level of understanding of pipeline safety program regulations

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

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

SLR Notes:

No probable violations were discovered during field activities. PSC inspectors did discuss concerns to field crew.

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

PSC inspectors performed field activities.
 April 12- R.K. Amroliwala WGL- Joint DIMP Status Review, Springfield, VA with DC PSC inspector M Singh
 April 19 A Jaiyeola BG&E- Pipe replacement, Baltimore
 April 21- J Clementson BG&E- Review of PHMSA Advisories, proactive measures LDCs can consider taking resulting from San Bruno, Ca incident

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

- | | | | |
|-----------|----------------------------------------------------------------------------------|-----------|-----------|
| 13 | Field Observation Areas Observed (check all that apply)
Info Only = No Points | Info Only | Info Only |
|-----------|----------------------------------------------------------------------------------|-----------|-----------|

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

SLR Notes:

DIMP implementation Status Review with WGL

14 Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

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



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?
Yes = 1.5 No = 0 | 1.5 | 1.5 |
|----------|-------------------------------------------------------------------------------------|-----|-----|

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 Inspection Procedure, page 3 outline describes "Risk Based Inspection Plan" review. According to PSC, this process will be formalized and results will be documented for CY 2011 evaluation cycle.

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

SLR Notes:

A review of the definition of "Inspection Units" in the State Guidelines and review of Attachment 1 in the 2010 Certifications indicate that the Commission has assigned the appropriate inspection units to the operators under its jurisdiction

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

SLR Notes:

PSC also eagerly awaits the arrival of Distribution Integrity Management (DIMP). The Engineering division will begin its inspection of DIMP plans this fall after it has completed its training with T&Q

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

SLR Notes:

PSC inspectors encounter areas that are at a higher risk they devote additional time in those areas, i.e. WG mechanical coupling leak issue and Eastern Shore Gas' bare steel replacement program.

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)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--------------------------------------------------------------------------------------------------------------------------------------|----|-----|

SLR Notes:

PSC continues to collect damage data- damages per 1000 ticket requests for 2000-2010. PSC actively promotes damage prevention program

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

SLR Notes:

Yes; PSC performs routine reviews of LDC Annual Report

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

SLR Notes:

PSC performs analysis of annual report data. PSC shared with GOAC meeting in Sept 2010

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

SLR Notes:

yes. PSc routinely reviews LDC data on gas incidents.

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

SLR Notes:

PSC does not have a formalized method to document this process. I encouraged PSC to modify State Inspection Procedure manual and include key steps and maintain appropriate supporting documents with summary. (Provide data/ charts /graphs, trends etc)

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:

For 2010, PSC performed 31 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:

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 completed 2 IMP inspections and expect to upload in IMDB shortly. PSC to advise of progress.

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 requested LDCs for this information at various GOAC meetings.

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:

Accident/Incident Investigation Learning and Sharing Lessons Learned

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

SLR Notes:

PSC has shared with NASPR members at ER meetings

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

SLR Notes:

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

SLR Notes:

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

Info Only Info Only

Info Only = No Points

SLR Notes:

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

.5

0.5

Yes = .5 No = 0

SLR Notes:

PSC inspectors completed Root cause Analysis training.

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 communicated on a quarterly basis with GOAC meetings and on an individual basis with LDCs.

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

.5

0.5

Yes = .5 No = 0

SLR Notes:

MD PSC website:
<http://webapp.psc.state.md.us/Intranet/home.cfm>

22 Part G: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

Total points scored for this section: 9
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 John Clementson is currently the Eastern Region chair, a member of Liaison Committee and is also a member of the NARUC Staff Sub-committee on Gas Safety.
- 2 PSC participated in a successful rewrite of the State's current "Miss Utility" law which was signed by the Governor in May of 2010

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

- PSC has two members on the stake holders group that is charged with the re-write of Title 12 ? Damage Prevention law in MD. In 2010, the revised "Miss Utility" law was sent to Annapolis to be made into law. The revisions made through the legislature and were signed by the Governor in May, 2010. The revisions to the law became effective in October of 2010

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

- PSC encourages pipe replacement of bare steel and cast iron. As a result, Eastern Shore Gas has met its first deadline for its Bare Steel Replacement program. They now have until 2018 to replace the remaining 7 miles of bare steel. They have currently replaced 23 miles of bare steel since 2002

Columbia Gas has entered into a 20 year replacement program for its bare steel and cast iron gas main

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

SLR Notes:

- The Commission's Engineering Division participated in several survey or information requests from NASPR and PHMSA. A couple are listed below:
- ? Gathering Line Survey
 - ? NAPSR Strategic Plan
 - ? Indirect Cost Questions

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

SLR Notes:

1. The Commission's Engineering Division has shared information with the Eastern Region with regards to the revisions that have been made to the State's "Miss utility" law.

- | | | | |
|----------|-------------------------------------------------------------------------|-----------|-----------|
| 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 conducts two types of D&A inspections. They are the EN10 ? Comprehensive Drug & Alcohol Inspection and the EN11 - Anti-Drug and Alcohol Misuse Prevention. The EN10 is a comprehensive program and records inspection and the EN11 is a self-assessment inspection that the operator completes. These inspections are done with each operator on alternating years. As part of these inspections, staff reviews positive results to ensure that they are being dealt with accordingly

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

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

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:

The Commission's Engineering Division conducts an inspection of an Operator's OQ program every three years. We also conduct OQ field inspections throughout the year. Also, as part of other types of field inspections, the qualifications of individuals performing covered tasks are checked and documented on the inspection form

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

SLR Notes:

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

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

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:

The Commission's Engineering Division conducts an inspection of an Operator's Transmission Integrity Management Program every other year. On a yearly basis, the Engineering Division's Staff inspect the operators when they are making their IMP required inspections in the field, including the digs. The Commission is currently using the Gas Trans. IMP inspection form created by PHMSA. The results of the comprehensive inspections are then uploaded into the IMDB

- | | | | |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|
| 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?
<small>Yes = .5 No = 0</small> | .5 | 0.5 |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|

SLR Notes:

-
- | | | | |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|
| 10 | Has the state reviewed operator IMPs for compliance with Subpart O? (In accordance with State Inspection plan)
<small>Yes = .5 No = 0</small> | .5 | 0.5 |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|

SLR Notes:

-
- | | | | |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|
| 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?
<small>Yes = .5 No = 0</small> | .5 | 0.5 |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|

SLR Notes:

-
- | | | | |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|
| 12 | Is the state verifying that operators are periodically examining their transmission line routes for the appearance of new HCAs?
<small>Yes = .5 No = 0</small> | .5 | 0.5 |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|

SLR Notes:

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)
<small>Yes = .5 No = 0</small> | .5 | 0.5 |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|

SLR Notes:

The Commission's Engineering Division has received a Public Awareness plan from the LDC's that are jurisdictional. However, it has not inspected those plans due to a lack of an inspection form. This last winter an inspection form was developed. It is the intention of the Engineering Division to inspect all of its LDC's Public Awareness Plans by August 31, 2009. The Master Meter operators will be inspected at their next routine inspection to ensure that they are complying with the applicable portions of RP1162. As part of the LDC's records inspection, the operator's records are checked to ensure that they are sending out notices to their customers as well as communicating with emergency response officials

-
- | | | | |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|
| 14 | Has the state reviewed the content of these programs for compliance with 192.616 (by participating in the Clearinghouse or by other means)?
<small>Yes = .5 No = 0</small> | .5 | 0.5 |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|

SLR Notes:

-
- | | | | |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|
| 15 | Is the state verifying that operators are conducting the public awareness activities called for in its program?
<small>Yes = .5 No = 0</small> | .5 | 0.5 |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|

SLR Notes:

-
- | | | | |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|
| 16 | Is the state verifying that operators have evaluated their Public Awareness programs for effectiveness as described in RP1162?
<small>Info Only = No Points</small> | Info Only | Info Only |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|

SLR Notes:

-
- | | | | |
|-----------|----------------------------------------------------------------------------------------|-----------|-----------|
| 17 | Part I: General Comments/Regional Observations
<small>Info Only = No Points</small> | Info Only | Info Only |
|-----------|----------------------------------------------------------------------------------------|-----------|-----------|

SLR Notes:

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

