



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

1200 New Jersey Avenue SE  
Washington DC 20590

## 2015 Gas State Program Evaluation

for

Washington Utilities and Transportation Commission

### Document Legend

#### PART:

- O -- Representative Date and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- Program Performance
- D -- Compliance Activities
- E -- Incident Investigations
- F -- Damage Prevention
- G -- Field Inspections
- H -- Interstate Agent State (If Applicable)
- I -- 60106 Agreement State (If Applicable)



# 2015 Gas State Program Evaluation -- CY 2015

## Gas

**State Agency:** Washington

**Agency Status:**

**Date of Visit:** 09/12/2016 - 09/16/2016

**Agency Representative:** Alan Rathbun

**PHMSA Representative:** Michael Thompson - David Appelbaum

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

**Name/Title:** Mr. David W. Danner, Chairman

**Agency:** Washington Utilities and Transportation Commission

**Address:** 1300 South Evergreen Park Drive, SW

**City/State/Zip:** Olympia, Washington 98502

**Rating:**

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

### 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 2015 (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

| <b>PARTS</b>        |  | <b>Possible Points</b> | <b>Points Scored</b> |
|---------------------|--|------------------------|----------------------|
| A                   | Progress Report and Program Documentation Review | 10                     | 10                   |
| B                   | Program Inspection Procedures                    | 13                     | 13                   |
| C                   | Program Performance                              | 47                     | 47                   |
| D                   | Compliance Activities                            | 15                     | 15                   |
| E                   | Incident Investigations                          | 11                     | 11                   |
| F                   | Damage Prevention                                | 8                      | 8                    |
| G                   | Field Inspections                                | 12                     | 12                   |
| H                   | Interstate Agent State (If Applicable)           | 6                      | 6                    |
| I                   | 60106 Agreement State (If Applicable)            | 0                      | 0                    |
| <b>TOTALS</b>       |  | <b>122</b>             | <b>122</b>           |
| <b>State Rating</b> | .....  |                        | <b>100.0</b>         |

# PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- | Item | Description   | Points | Score |
|------|---|--------|-------|
| 1    | Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1<br>Yes = 1 No = 0 Needs Improvement = .5 | 1      | 1     |

Evaluator Notes:  
No Issues Found

- |   |  |   |   |
|---|--|---|---|
| 2 | Review of Inspection Days for accuracy - Progress Report Attachment 2<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:  
No Issues found. The tracking for this information is done in their data base and uses information input on the inspectors time sheets.

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

Evaluator Notes:  
No issues found. The operators listed on the progress report were compared to those on found on the PHMSA Pipeline Data Mart.

- |   |  |   |   |
|---|--|---|---|
| 4 | Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:  
Yes, the information on the PHMSA Pipeline Data Mart was used for verification.

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

Evaluator Notes:  
Yes, Inspection reports and compliance documents were reviewed to verify accuracy of the report.

- |   |   |   |   |
|---|---|---|---|
| 6 | Were pipeline program files well-organized and accessible? - Progress Report Attachment 6<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:  
Yes, the WUTC pipeline safety program files were well organized and accessible. The files are kept in both electronic and hard copy format.

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

Evaluator Notes:  
Yes, it was verified using information on the PHMSA TQ (SABA) system.

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

Evaluator Notes:  
Yes, they are updated annually.



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

Evaluator Notes:

Yes, the WUTC was specific in describing their accomplishments for 2015.

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10 General Comments:  
Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

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Total points scored for this section: 10  
Total possible points for this section: 10



# PART B - Program Inspection Procedures

Points(MAX) Score

- 1 Standard Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities.

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

No Issues, procedures found in WUTC manual, Sections 14, 15 and 16

- 2 IMP and DIMP Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities.

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No Issues, procedures found in WUTC manual, Sections 22 and 36

- 3 OQ Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities.

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No Issues, procedures found in WUTC manual, Section 17

- 4 Damage Prevention Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities.

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No Issues, procedures found in WUTC manual, Sections 15, 16 and new updated section 31. (Part of Standard Inspection)

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Inspector Dennis Ritter completed training with Alta Gas in 2015. This is done as part of the first visit to new operators and is called a Technical Assistance visit.

- 6 Construction Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities.

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No Issues, procedures found in WUTC manual, Sections 21

- 7 Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements?

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

- a. Length of time since last inspection (Within five year interval)

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:

After review of the WUTC procedures manual there were no issues found.

**8** General Comments:

Info Only = No Points

Info Only Info Only

Evaluator Notes:

Inspection procedures had been updated and improved from last years evaluation.

Total points scored for this section: 13  
 Total possible points for this section: 13



# PART C - Program Performance

Points(MAX) Score

- 1** Was ratio of Total Inspection person-days to total person days acceptable? (Director of State Programs may modify with just cause) Chapter 4.3 5 5  
 Yes = 5 No = 0  
 A. Total Inspection Person Days (Attachment 2):  
 738.82  
 B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
 220 X 6.81 = 1497.83  
 Ratio: A / B  
 738.82 / 1497.83 = 0.49  
 If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0  
 Points = 5

**Evaluator Notes:**

The WUTC met the requirement and again with a .49 ratio and had a good number of Construction-Design inspection days with 346.

- 2** Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines Appendix C for requirements) Chapter 4.4 5 5  
 Yes = 5 No = 0 Needs Improvement = 1-4
- a. Completion of Required OQ Training before conducting inspection as lead? Yes  No  Needs Improvement
  - b. Completion of Required DIMP\*/IMP Training before conducting inspection as lead? \*Effective Evaluation CY2013 Yes  No  Needs Improvement
  - c. Root Cause Training by at least one inspector/program manager Yes  No  Needs Improvement
  - d. Note any outside training completed Yes  No  Needs Improvement
  - e. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector. Yes  No  Needs Improvement

**Evaluator Notes:**

The WUTC continues to have their inspectors do NACE courses and has a majority of them with Level I and a few Level II. They also have done (Baker-Hughes) Investigation courses.

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

**Evaluator Notes:**

Yes discussions with the State Program Manager and their Lead Engineer indicated adequate knowledge of PHMSA program and the regulations.

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

**Evaluator Notes:**

Yes, Letter to Chair on 11/4/2015 and the response back to PHMSA on 12/10/2015.

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

**Evaluator Notes:**

Yes, on 5/12/2015

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

**Evaluator Notes:**



Yes, the review of inspections conducted in 2015 and WUTC records documents were used to verify the types and intervals of inspections.

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

Evaluator Notes:

Yes, the WUTC uses IA for their Interstate inspections and merges the PHMSA forms with their own forms for state regulations on other types of inspections.

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

Evaluator Notes:

No known cast iron in Washington state

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

Evaluator Notes:

No known cast iron in Washington state.

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

Evaluator Notes:

Yes, it is a part of their procedures checklist, Items 375 and 376.

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|----|--|---|---|
| 11 | Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 192.617? Chapter 5.1<br>Yes = 1 No = 0 | 1 | 1 |
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Evaluator Notes:

Yes, the WUTC has added questions to the federal form under their WAC. Questions 116,120 and 130. The operators now use DIRT in Washington to help track and report damages.

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

Evaluator Notes:

Yes, the WUTC uses and verifies the mileage information from the annual report and are using the leak data along with the information that is collected directly from the operators in greater detail to be used in their risk assessment and inspection scheduling.

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|----|--|---|---|
| 13 | Did state input all applicable OQ, DIMP/IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----|--|---|---|

Evaluator Notes:

Yes, verified no issues.

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

Evaluator Notes:

Yes, the WUTC has added a question to the federal form to help accomplish this. It is question number 1 (49USC 60132, Section (B)).

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

Evaluator Notes:

Yes, the WUTC completes a D&A with each standard inspection. (Only one for each operator, not each unit)

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

Evaluator Notes:

Yes, the WUTC does a OQ Plan inspection every five years and does a protocol 9 form with every standard inspection. The operators are required by state rule to submit all plan updates or changes to the WUTC.

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

Evaluator Notes:

Yes, the programs are scheduled for inspection every five years, while monitoring of the progress of tests and remedial actions taking place is done on an ongoing basis.

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|-----------|---|---|---|
| <b>18</b> | Is state verifying operator's gas distribution integrity management Programs (DIMP)? This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart P DIMP ? First round of program inspections should have been complete by December 2014<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

Full program inspections are scheduled to be done on 5 year intervals. Accelerated Actions planed by the operators are being monitored on an ongoing basis.

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|-----------|---|---|---|
| <b>19</b> | Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. 49 CFR 192.616 (I13-16) PAPEI Effectiveness Inspections should be conducted every four years per RP1162<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

Yes they continue to perform inspections and are adding additional questions to the Standard inspection form.

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

Evaluator Notes:

Yes, they meet quarterly with the Citizens Committee on Pipeline Safety, Post all inspection, enforcement action on their website along with other important information, resources and rule making updates.

|           |   |   |    |
|-----------|---|---|----|
| <b>21</b> | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|-----------|---|---|----|

Evaluator Notes:

No Safety Related Conditions in 2015.

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

Evaluator Notes:

Yes, the WUTC has a materials defect report that operators are required by state rules to submit. They are also required to submit all planned pipe replacement projects with justification, (risk ranked) every two years.

|           |  |   |   |
|-----------|--|---|---|
| <b>23</b> | Did the state participate in/respond to surveys or information requests from NAPSRS or PHMSA?<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

Yes, they provided documentation of their participation and even initiated a survey thru NAPSRS in 2015.

|           |  |   |   |
|-----------|--|---|---|
| <b>24</b> | If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate.<br>No = 0 Needs Improvement = .5 Yes = 1 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

Yes, they have reviewed and closed all applicable waivers that could be, and have only one they are working on in 2016.

|           |   |   |   |
|-----------|---|---|---|
| <b>25</b> | Did the state attend the National NAPSRS Board of Directors Meeting in CY being evaluated?<br>No = 0 Needs Improvement = .5 Yes = 1 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes, Alan Rathbun - Program Manager attended in 2015.

|           |   |   |   |
|-----------|---|---|---|
| <b>26</b> | Discussion on State Program Performance Metrics found on Stakeholder Communication site - <a href="http://primis.phmsa.dot.gov/comm/states.htm">http://primis.phmsa.dot.gov/comm/states.htm</a><br>No = 0 Needs Improvement = 1 Yes = 2 | 2 | 2 |
|-----------|---|---|---|

- a. Discussion of Potential Accelerated Actions (AA's) based on any negative trends    Yes     No     Needs Improvement
- b. NTSB P-11-20 Meaningful Metrics    Yes     No     Needs Improvement

Evaluator Notes:

Discussed Metrics with Alan Rathbun and Joe Subsits. Covered the following.

Damages per 1000 locate tickets have increased from 2014 to 2015 back to a level close to 2013, but are still below 2010 thru 2012 and are at about 5 per 1000 locate requests.

Inspection days per 1000 miles of pipeline have increased over the past three years from 11 to almost 15 per 1000 miles of gas pipeline. The days for Hazardous Liquids pipelines decreased slightly from 2013, but is higher than 2010 thru 2012

Inspection days per MMO/LPG have increased significantly over 2014, however they are still below the levels in 2012 and 2013.



Pipeline inspector qualification has improved in the core+ additional training and with inspectors over 5 years.

A leak repaired per 1000 miles continues to increase over the past three years with almost 100 per 1000 miles, while hazardous leaks repaired stay about the same for the past five years. Outstanding leaks have decreased significantly from 2014 to 2015, but are still higher than any year from 2010 to 2013.

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27 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

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Total points scored for this section: 47  
Total possible points for this section: 47



# 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<br>Yes = 4 No = 0 Needs Improvement = 1-3 | 4                                    | 4  |
| a. | Procedures to notify an operator (company officer) when a noncompliance is identified  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. | Procedures to routinely review progress of compliance actions to prevent delays or breakdowns  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

Yes, the procedures can be found in the WUTC's manual in Sections 25,26 and 34.

- |    |  |                                      |  |
|----|--|--------------------------------------|--|
| 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<br>Yes = 4 No = 0 Needs Improvement = 1-3 | 4                                    | 4  |
| a. | Were compliance actions sent to company officer or manager/board member if municipal/government system?  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. | Document probable violations   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| c. | Resolve probable violations  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| d. | Routinely review progress of probable violations   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| e. | Were applicable civil penalties outlined in correspondence with operator(s)  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

The WUTC started outlining applicable civil penalties in all compliance correspondence after being advised to by the State Liaison during the 2016 NAPS Western Region meeting.

- |   |  |   |   |
|---|--|---|---|
| 3 | Did the state issue compliance actions for all probable violations discovered?<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, this was verified in review of inspection records and compliance actions.

- |   |   |   |   |
|---|---|---|---|
| 4 | Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary.<br>Yes = 2 No = 0 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Yes, the WUTC has policy and procedures in place to insure all parties are given reasonable due process.

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

Evaluator Notes:

Yes, the program manager is familiar with the process for imposing civil penalties.

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

Evaluator Notes:

Yes, the WUTC issued and collected \$275,000.00 in civil penalties and is working on a complaint that has filed for \$4,000,000.00 against a single operator in 2016.

- |   |  |   |           |
|---|--|---|-----------|
| 7 | General Comments:<br>Info Only = No Points | 1 | Info Only |
|---|--|---|-----------|



Evaluator Notes:

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



# PART E - Incident Investigations

Points(MAX) Score

- 1 Does the state have written procedures to address state actions in the event of an incident/accident? 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, the WUTC has procedures that cover from notification to completion including the completion of the 30day reports. Their procedures can be found in Sections 10,19,and 20 of their manual.

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

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

Evaluator Notes:

Yes, the WUTC procedures can be found in Sections 10 and 19 of their manual.

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

Evaluator Notes:

Yes, each incident was well documented, including contact names, dates, events and evidence.

- 4 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? 3 3  
Yes = 3 No = 0 Needs Improvement = 1-2

- a. Observations and document review Yes  No  Needs Improvement   
b. Contributing Factors Yes  No  Needs Improvement   
c. Recommendations to prevent recurrences when appropriate Yes  No  Needs Improvement

Evaluator Notes:

Yes, all incident records for 2015 were reviewed.

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

Evaluator Notes:

Yes, no issues.

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

Evaluator Notes:

Yes, the WUTC is also an interstate agent and worked very closely with the PHMSA Western Region by participating in interstate incident investigations.

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

Evaluator Notes:

Yes, the program manager shared these as part of his state of the state presentation at the NAPSR Western Region meeting in 2015.

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**8** General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

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



**PART F - Damage Prevention**

**Points(MAX) Score**

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

Evaluator Notes:  
Yes, WUTC has the requisite question embedded in the federal inspection form to address this.

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

Evaluator Notes:  
Yes, reflected in records and field checklists: Distribution questions 106-114, Transmission questions 93-107.

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

Evaluator Notes:  
Yes, WUTC has a dedicated position to damage prevention, and occupies a seat on the State's Dig Law Safety Committee. WUTC has also participated in Dig Law newsletter and various trade shows.

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

Evaluator Notes:  
Yes, WUTC uses information from the State's DIRT system and the PHMSA annual report. Data is analyzed by county to determine dig-in rates and routine reports are assessed to look at root causes.

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- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>5</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:  
PHMSA conducted Washington's excavation damage prevention law enforcement program evaluation on April 26, 2016. The State received a score of 220 and it is anticipated that a formal determination of Adequacy will be provided by the end of the year.

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



# PART G - Field Inspections

Points(MAX) Score

**1** Operator, Inspector, Location, Date and PHMSA Representative Info Only Info Only  
 Info Only = No Points

Name of Operator Inspected:  
 Avista Utilities  
 Name of State Inspector(s) Observed:  
 Lex Vinsel  
 Location of Inspection:  
 Spokane, WA and surrounding area  
 Date of Inspection:  
 May 16-20, 2016  
 Name of PHMSA Representative:  
 Michael Thompson and Dave Appelbaum

Evaluator Notes:

This field evaluation covered the following:  
 Regulator stations - over pressure protection, physical condition, regulator lock up and operation, operation of station valves and station security  
 Rectifier station reads, random cathodic protection reads, visual inspection of bridge and road cased crossings that included CP reads for the carrier piping and casing, random valve operation, random odorant level reads across the system.

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

Evaluator Notes:

Yes, the operator was contacted in advance and planning meetings were conducted to schedule so the appropriate field personnel would be available for the different field operations to inspected.

**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) 2 2  
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, the inspector used the states field inspection form as a guide for all parts of this inspection.

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

Evaluator Notes:

Yes, the inspector used a note book to document each activity observed. Including regulator station names and numbers, pressure readings, CP readings and over pressure protection equipment operation, valve numbers, rectifier station numbers and reads on a daily basis.

**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.) 1 1  
 Yes = 1 No = 0

Evaluator Notes:

Yes, the inspector reviewed and recorded all information necessary for the equipment used by the operator to conduct each task observed.

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

- a. Procedures
- b. Records
- c. Field Activities



d. Other (please comment)

Evaluator Notes:

Yes, the inspector requested and reviewed the operators most recent procedures for all tasks to be observed before going into the field. The inspector had the operators representatives go through all steps required in each task observed.

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

Evaluator Notes:

Yes, the inspector showed an adequate knowledge of the pipeline safety program and regulations in his actions and questions/comments during the inspection.

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

Evaluator Notes:

Yes, the inspector held a interview with the operator based on the information gathered during this field portion of the standard inspection and plans to conduct a complete exit interview with the operator when the total inspection is complete.

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

Evaluator Notes:

No probable violations were identified during this field portion of the inspection.

10 General Comments: 1) What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) 2) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) 3) Other. Info Only Info Only

Info Only = No Points

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



- y. Purging
- z. Prevention of Accidental Ignition
- A. Repairs
- B. Signs
- C. Tapping
- D. Valve Maintenance
- E. Vault Maintenance
- F. Welding
- G. OQ - Operator Qualification
- H. Compliance Follow-up
- I. Atmospheric Corrosion
- J. Other

Evaluator Notes:

The field inspection was laid out to inspect as many different field activities as possible during the time spent in the field .

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



**PART H - Interstate Agent State (If Applicable)**

**Points(MAX) Score**

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

Evaluator Notes:  
Yes, they use the IA system

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

Evaluator Notes:  
Yes, the WUTC uses a tracking sheet.

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

Evaluator Notes:  
Yes, all were submitted well within the 60 day window

**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.) 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:  
Yes, No Issues.

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

Evaluator Notes:  
None necessary in 2015.

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

Evaluator Notes:  
Yes, the WUTC has set a 45 day bench mark for themselves.

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

Evaluator Notes:  
Yes

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

Evaluator Notes:  
In a telephone conversation with Chris Hoidal, Director of the Western Region, PHMSA he stated that he had no issues with the WUTC as an interstate agent and said that they were doing a good job.

Total points scored for this section: 6  
Total possible points for this section: 6

**PART I - 60106 Agreement State (If Applicable)**

**Points(MAX) Score**

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

Evaluator Notes:  
WUTC does not have a 60106 Agreement.

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

Evaluator Notes:  
WUTC does not have a 60106 Agreement.

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

Evaluator Notes:  
WUTC does not have a 60106 Agreement.

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

Evaluator Notes:  
WUTC does not have a 60106 Agreement.

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

Evaluator Notes:  
WUTC does not have a 60106 Agreement.

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

Evaluator Notes:  
WUTC does not have a 60106 Agreement.

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

Evaluator Notes:

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

