



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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Via Email Zach.barrett@dot.gov

August 19, 2020

Zach Barrett
Director, State Programs
Office of Pipeline Safety
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
3700 S MacArthur Blvd, Suite B
Oklahoma City, OK 73179-7612

Dear Mr. Barrett:

RE: Washington State Pipeline Safety Program- Response to 2019 Evaluation Letter

Thank you for your letter dated August 6, 2020. I appreciate the opportunity to update the Pipeline and Hazardous Materials Safety Administration (PHMSA) about the Washington Utilities and Transportation Commission's (UTC) pipeline safety program.

Below is our response to the one issue (item number 1) you listed:

1. A comprehensive review was conducted to verify that the WUTC has inspected all types of operators and inspection units within the maximum time intervals established in its written procedures. Several instances were identified where the intervals were not met for conducting comprehensive inspections of operators' drug and alcohol (D&A) misuse plans. The program has since corrected this deficiency having performed or scheduled in the near term any outstanding D&A inspections.

The commission acknowledges PHMSA's finding that staff did not meet the appropriate intervals for some D&A inspections. As noted in your findings letter, staff identified this discrepancy prior to the audit and had begun to implement corrective actions related to both work plan scheduling and documentation. We anticipate that these corrective actions will minimize the likelihood of this oversight reoccurring.

Zach Barrett
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Thank you, and David Lykken, for your professionalism and courtesy throughout the audit. If you have questions about this letter or other pipeline safety matters, please contact me directly at dave.danner@utc.wa.gov. You may also contact Sean Mayo, Director of Pipeline Safety at (360) 664-1219 or sean.mayo@utc.wa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "David W. Danner". The signature is fluid and cursive, with the first name "David" being the most prominent.

David W. Danner
Chair

cc: Don Martin, PHMSA State Programs
Dustin Hubbard, PHMSA Western Region Director
David Lykken, PHMSA State Programs