



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

1200 New Jersey Avenue SE  
Washington DC 20590

# 2021 Gas State Program Evaluation

for

Washington Utilities and Transportation Commission

## Document Legend

### PART:

- O -- Representative, Dates and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- State Qualifications
- D -- Program Performance
- E -- Field Inspections
- F -- Damage prevention and Annual report analysis
- G -- Interstate Agent/Agreement States



# 2021 Gas State Program Evaluation -- CY 2021

Gas

**State Agency:** Washington

**Rating:**

**Agency Status:**

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

**Date of Visit:** 04/07/2022 - 04/07/2022

**Agency Representative:** Sean Mayo, Director, Pipeline Safety Division, WUTC

**PHMSA Representative:** David Lykken, Transportation Specialist, PHMSA State Programs Division

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

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

**Agency:** Washington Utilities and Transportation Commission

**Address:** 621 Woodland Square Loop SE

**City/State/Zip:** Lacey, WA 98503

**INSTRUCTIONS:**

Complete this evaluation in accordance with the Evaluator Guidance for conducting state pipeline safety program evaluations. The evaluation should generally reflect state program performance during CY 2021 (not the status of performance at the time of the evaluation). 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 appropriate notes/comments section. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and they OBJECTIVELY reflect the state's program performance for the question being evaluated. Increasing emphasis is being placed on how the state pipeline safety programs conduct and execute their pipeline safety responsibilities (their 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.

**Scoring Summary**

<b>PARTS</b>	<b>Possible Points</b>	<b>Points Scored</b>
A Progress Report and Program Documentation Review	0	0
B Program Inspection Procedures	15	15
C State Qualifications	10	10
D Program Performance	50	50
E Field Inspections	15	15
F Damage prevention and Annual report analysis	10	10
G Interstate Agent/Agreement States	0	0
<b>TOTALS</b>	<b>100</b>	<b>100</b>
<b>State Rating</b> .....		<b>100.0</b>



**PART A - Progress Report and Program Documentation Review**

**Points(MAX) Score**

- 1 Were the following Progress Report Items accurate? (\*items not scored on progress report) Info Only Info Only  
 Info Only = No Points
- a. Stats On Operators Data - Progress Report Attachment 1
  - b. State Inspection Activity Data - Progress Report Attachment 2
  - c. List of Operators Data - Progress Report Attachment 3\*
  - d. Incidents/Accidents Data - Progress Report Attachment 4\*
  - e. Stats of Compliance Actions Data - Progress Report Attachment 5\*
  - f. List of Records Kept Data - Progress Report Attachment 6 \*
  - g. Staff and TQ Training Data - Progress Report Attachment 7
  - h. Compliance with Federal Regulations Data - Progress Report Attachment 8
  - i. Performance and Damage Prevention Question Data - Progress Report Attachment 10\*

**Evaluator Notes:**

a & c) Operator/Inspection Unit totals listed on Attachment 1 are consistent with the Operator/Inspection Unit totals noted on Attachment 3. b) No issues. d & e) No issues. The program now lists all state & federal PV's as part of their count. g) Information verified through T&Q Blackboard training site. Training for personnel found to be complete and accurate. h) Working to adopt new GT amendments in CY2021.

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



- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | Do written procedures address pre-inspection, inspection and post inspection activities for each of the following inspection types: Chapter 5.1<br>Yes = 5 No = 0 Needs Improvement = 1-4   | 5 | 5 |
|          | <ul style="list-style-type: none"> <li>a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspections</li> <li>b. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually)</li> <li>c. OQ Inspections</li> <li>d. Damage Prevention Inspections</li> <li>e. On-Site Operator Training</li> <li>f. Construction Inspections (annual efforts)</li> <li>g. LNG Inspections</li> </ul> |   |   |

**Evaluator Notes:**

Yes. No revisions made to the program's written Policy & Procedures Manual since last program evaluation. a. Section 14 General and Specialized Insp Procedures, Section 15. Entire section devoted to Pre, Inspection, and Post inspection activities; b. Sections 22 (IMP) and 36 (DIMP); c. Section 17; d. Damage Prevention activities under Section 31; e. Section 27 - Training and Outreach Policy; f. Section 21 Design, Testing & Construction Inspections; g. LNG inspection frequency (not to exceed 3 yrs) addressed under Section 13 - Inspection Scheduling Policy. Also Section 33 for CRM inspections.

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | Do written procedures address inspection priorities of each operator, and if necessary each unit, based on the following elements and time frames established in its procedures? Chapter 5.1<br>Yes = 4 No = 0 Needs Improvement = 1-3   | 4 | 4 |
|          | <ul style="list-style-type: none"> <li>a. Length of time since last inspection</li> <li>b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)</li> <li>c. Type of activity being undertaken by operators (i.e. construction)</li> <li>d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.)</li> <li>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)</li> <li>f. Are inspection units broken down appropriately?</li> </ul> |   |   |

**Evaluator Notes:**

No revisions made since last program evaluation. a thru e - Sections 13 and 13.1 Workplan Development and Scheduling; f. Units apportioned satisfactory.

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|----------|---|---|---|
| <b>3</b> | (Compliance Procedures) 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 = 3 No = 0 Needs Improvement = 1-2  | 3 | 3 |
|          | <ul style="list-style-type: none"> <li>a. Procedures to notify an operator (company officer) when a noncompliance is identified</li> <li>b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns</li> <li>c. Procedures regarding closing outstanding probable violations</li> </ul> |   |   |

**Evaluator Notes:**

No changes from prior year. Sections referenced taken from the program's Policy & Inspection Manual. a thru c addressed under Sections 15 (Standard Intra Inspections & Correspondence), 25 (Compliance Enforcement Tracking Policy), Section 26 (Follow-up Inspection Policy), and Section 34 (Compliance and Enforcement Policy). Section 37 (Civil Penalty Consideration Factor Policy).



- 4 (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident? 3 3  
Yes = 3 No = 0 Needs Improvement = 1-2
- a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports
  - b. If onsite investigation was not made, do procedures require on-call staff to obtain sufficient information to determine the facts to support the decision not to go on-site.

Evaluator Notes:

No changes from prior year. Section 10 (On-Call and Telephonic Notification), Section 20 (Response to Pipeline Incidents), Section 24 (Investigations Policy), Section 24-A (Level of Investigation Matrix).

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

Evaluator Notes:

No issues identified. No point deductions under Part B.

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



**PART C - State Qualifications**

**Points(MAX) Score**

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- 1** Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.3 5 5  
Yes = 5 No = 0 Needs Improvement = 1-4
- a. Completion of Required OQ Training before conducting inspection as lead
  - b. Completion of Required DIMP/IMP Training before conducting inspection as lead
  - c. Completion of Required LNG Training before conducting inspection as lead
  - d. Root Cause Training by at least one inspector/program manager
  - e. Note any outside training completed
  - f. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1)

**Evaluator Notes:**

a-c: Yes. All inspectors including the new Chief Engineer and PM have attended and successfully completed required training. d. Yes. Nine inspectors including new Chief Engineer and PM have completed Root Cause Training. e. None in CY2020 f. All inspection staff who led Standard Inspections conducted in 2021 were qualified.

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- 2** Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? 5 5  
Yes = 5 No = 0 Needs Improvement = 1-4

**Evaluator Notes:**

Yes. Sean Mayo has attended and successfully completed the T&Q Gas Inspector, Liquid Inspector, and Failure paths required for the PM position. Sean has been with the safety program for 5 years.

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

**Evaluator Notes:**

No issues identified. No point deductions under Part C.

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



**PART D - Program Performance**

**Points(MAX) Score**

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- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1<br>Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|----------|--|---|---|
- a. Standard (General Code Compliance)
  - b. Public Awareness Effectiveness Reviews
  - c. Drug and Alcohol
  - d. Control Room Management
  - e. Part 193 LNG Inspections
  - f. Construction (did state achieve 20% of total inspection person-days?)
  - g. OQ (see Question 3 for additional requirements)
  - h. IMP/DIMP (see Question 4 for additional requirements)

**Evaluator Notes:**

a-h: Yes. No issues noted. Time intervals met for all inspection types. Refer to WA CY2021 Random Operator list for specifics.

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|----------|---|----|----|
| <b>2</b> | 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. Do inspection records indicate that adequate reviews of procedures, records and field activities, including notes and the appropriate level of inspection person-days for each inspection, were performed?<br>Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
|----------|---|----|----|
- a. Standard (General Code Compliance)
  - b. Public Awareness Effectiveness Reviews
  - c. Drug and Alcohol
  - d. Control Room Management
  - e. Part 193 LNG Inspections
  - f. Construction
  - g. OQ (see Question 3 for additional requirements)
  - h. IMP/DIMP (see Question 4 for additional requirements)

**Evaluator Notes:**

Same as prior year. The program utilizes the IA application for conducting most inspection types except construction and operator annual reviews.

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|----------|--|---|---|
| <b>3</b> | Is state verifying monitoring (Protocol 9/Form15) of operators OQ programs? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals established in the operator's plan. 49 CFR 192 Part N<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

**Evaluator Notes:**

No change from prior year. The program has reviewed OQ plans within the timeframes established. Protocol 9 inspections are conducted during LDC annual reviews, standard, and construction inspections.

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|----------|--|---|---|
| <b>4</b> | Is state verifying operator's integrity management Programs (IMP and DIMP)? This should include a review of plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operator's plan(s). 49 CFR 192 Subparts O and P<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|
- a. Are the implementation plans of the state's large/largest operators(s) being reviewed annually to ensure they are completing full cycle of the IMP process?
  - b. Are states verifying with operators any plastic pipe and components that have shown a record of defects/leaks and mitigating those through DIMP plan?

- c. Are the states verifying operators are including low pressure distribution systems in their threat analysis?

Evaluator Notes:

No changes from prior year. 26 days were devoted to IM activities in CY2021.

- a: The program conducts a review annually with the state's four LDC's consisting in part a review of the operator's DIMP/TIMP plan revisions, plan effectiveness evaluation, remediation work performed the prior year and work anticipated for the coming year.
- b: Operators are required to file annual reports detailing all construction defects and material failures which result in leakage. Submissions are reviewed as part of the operator Annual Review process.
- c: No low pressure distribution remaining in WA.

5	Did the state review the following (these items are NTSB recommendations to PHMSA that have been deemed acceptable response based on PHMSA reviewing these items during the evaluation process): Chapter 5.1	2	2
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Yes = 2 No = 0 Needs Improvement = 1

- a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken;
- b. 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);
- c. 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;
- d. 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;
- e. 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;
- f. Operator procedures for considering low pressure distribution systems in threat analysis?
- g. Operator compliance with state and federal regulations for regulators located inside buildings?

Evaluator Notes:

- a & b - No CI remaining in WA
- c & d: Yes as part of the operator annual review.
- e: Reviewed under IA Procedural Questions PD.OC.PDPROGRAM.P and GDIM.RA.INFOCONSIDERED.P
- f: No low pressure remaining in WA
- g: IA inspection forms bring focus to inside regulators/meter installations.

6	Did the State verify Operators took appropriate action regarding advisory bulletins issued since the last evaluation? (Advisory Bulletins Current Year)	1	1
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Covered as part of the operator annual review and at meetings with operators. No Advisory bulletins issued in CY2021.

7	(Compliance Activities) 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	10	10
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Yes = 10 No = 0 Needs Improvement = 1-9

- a. Were compliance actions sent to company officer or manager/board member if municipal/government system?
- b. Were probable violations documented properly?
- c. Resolve probable violations



- d. Routinely review progress of probable violations
- e. Did state issue compliance actions for all probable violations discovered?
- f. Can state demonstrate fining authority for pipeline safety violations?
- g. Does Program Manager review, approve and monitor all compliance actions?  
(note: Program Manager or Senior Official should sign any NOPV or related enforcement action)
- h. Did state compliance actions give reasonable due process to all parties?  
Including "show cause" hearing, if necessary.
- i. Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns
- j. Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. (Incident investigations do not need to meet 30/90-day requirement)

Evaluator Notes:

Yes. All non-compliance letters issued in CY2021 reviewed. Operator is notified immediately and issues discussed with management at the time a PV identified. No compliance letters exceeded the 90 day requirement. Most sent out within five to 10 business days of inspection completion. The program has demonstrated it's fining authority having last collected civil penalties in CY2017.

<b>8</b>	(Incident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations? Yes = 10 No = 0 Needs Improvement = 1-9	10	10
	<ul style="list-style-type: none"> <li>a. Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports?</li> <li>b. Did state keep adequate records of Incident/Accident notifications received?</li> <li>c. If onsite investigation was not made, did the state obtain sufficient information from the operator and/or by means to determine the facts to support the decision not to go on site?</li> <li>d. Were onsite observations documented?</li> <li>e. Were contributing factors documented?</li> <li>f. Were recommendations to prevent recurrences, where appropriate, documented?</li> <li>g. Did state initiate compliance action for any violations found during any incident/accident investigation?</li> <li>h. Did state assist Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA?</li> <li>i. Does state share any lessons learned from incidents/accidents?</li> </ul>		

Evaluator Notes:

Yes.  
a: Pipeline operators contact the 24-Hr Emergency Response line which is then directed to the on-call engineer.  
b: Yes. Reviewed the two incident reports generated. UTC Incident Investigation Form H Reports were detailed and made good use of photographs.  
c: All reportables were responded to.  
d & e: Yes.  
g: Yes, when applicable. No PV's identified for CY2021 incidents.  
h: The program maintains good communications with PHMSA AID and Western Region offices during reportable events.  
I: Yes, during seminars and annual NAPSRS meetings.

<b>9</b>	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 Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

Typically yes. Letter to Chairman dated 8/25/2021. The program scored full points. No response required.

**10** Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5 Info Only Info Only  
Info Only = No Points

Evaluator Notes:

During Covid-19 period only conducting meetings with the larger operators. The program anticipates going back to annual meetings with all operates in 2023.

**11** Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

Yes as part of the operator's annual reviews. Item is included on the WUTC Annual Review inspection form.

**12** 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). 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Same as in past reviews. The UTC web site provides information and links to other external resources including Call Before You Dig, State and Federal Pipeline Safety Rules, Pipeline News, Completed inspection reports, forms and compliance letters, Failure Investigation reports, enforcement action information, and the Citizens Committee on Pipeline Safety.

**13** Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.7 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes. Two SRCR's reported on 12/23/2021. Both follow-up on with the operator. One closed the same day on 12/23/21 and the other closed on 1/20/22. No IM Notifications in CY2021. Verified on the WMS.

**14** Was the State responsive to: 1 1  
Yes = 1 No = 0 Needs Improvement = .5  
a. Surveys or information requests from NAPS or PHMSA; and  
b. PHMSA Work Management system tasks?

Evaluator Notes:

Yes. Reviewed responses to certain requests for data and Survey Monkey results.

**15** 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. 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

None new issued in CY2021. Discussed with PM about possibly requesting the removal from PHMSA web site two waivers from 2002 and 2003 no longer relevant due to changes in federal code requirements.

**16** Were pipeline program files well-organized and accessible? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

No issues. Records made readily available.

**17** Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT). Has the state updated SICT data? 3 3  
Yes = 3 No = 0 Needs Improvement = 1-2

Evaluator Notes:

Yes. No issues noted. May do some adjusting this year.



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- 18** Discussion on State Program Performance Metrics found on Stakeholder Communication Info Only Info Only  
site.\ <http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805>  
Info Only = No Points

Evaluator Notes:

Yes. Discussed performance metrics. No significant changes. The WA-UTC metrics appeared to be at reasonable performance levels. Excavation damages per 1000 tickets (requested) continues to trend down since 2015 averaging approximately 2.9 damages in CY2020. Number of inspection days have increased to over 15 days per 1K miles of pipeline. Gas inspector core training at 100% and five year retention currently at 90%.

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- 19** Did the state encourage and promote operator implementation of Pipeline Safety Management Systems (PSMS), or API RP 1173? This holistic approach to improving pipeline safety includes the identification, prevention and remediation of safety hazards. Info Only Info Only

Info Only = No Points

- a. <https://pipelinesms.org/>
- b. Reference AGA recommendation to members May 20, 2019

Evaluator Notes:

Yes. The program does promote implementation of PSMS via annual operator meetings and as part of the Operator Annual Reviews (Refer to the WUTC's OAR Checklist). One LDC currently in the process of developing and implementing SMS programs.

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- 20** General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues identified. No point deductions under Part D.

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Total points scored for this section: 50  
Total possible points for this section: 50



- 1** Operator, Inspector, Location, Date and PHMSA Representative (enter specifics into the Info Only Info Only comments box below) Info Only Info Only  
 Info Only = No Points
- a. What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc)
  - b. When was the unit inspected last?
  - c. Was pipeline operator or representative present during inspection?
  - d. Effort should be made to observe newest state inspector with least experience

**Evaluator Notes:**

- a: A Standard, O&M Review & Section 114 inspections of the Cardinal FG gas transmission pipeline.
- b. Last standard inspected was on 3/11-25/2019
- c: Yes
- d: Mr. Tinnerstet has been with the pipeline program since 2018.

- 2** 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 utilized the Inspection Assistant - WA state specific protocols for conducting the Standard and O&M review. The standard list of Section 114 questions found in the IA was also utilized. A WUTC Field Data Collection form was utilized to record field facility checks, facility locations, and test equipment calibration data.

- 3** Did the inspector adequately review the following during the inspection 10 10  
 Yes = 10 No = 0 Needs Improvement = 1-9
- a. Procedures (were the inspector's questions of the operator adequate to determine compliance?)
  - b. Records (did the inspector adequately review trends and ask in-depth questions?)
  - c. Field Activities/Facilities (did inspector ensure that procedures were being followed, including ensuring that properly calibrated equipment was used and OQ's were acceptable?)
  - d. Other (please comment)
  - e. Was the inspection of adequate length to properly perform the inspection?

**Evaluator Notes:**

Yes. a; Written procedures reviewed in office and on-site with operator.

b: Record review was sufficient. Several issues identified primarily related to operator O&M manual parroting CFR & States codes rather than having system specific procedures in place as required, certain records from original construction project not available or missing. No records on file of operator personnel having emergency response training, OQ training re-certification date had lapsed for one task (General AOC - Ignition source & Properties of Natural Gas) for one individual.

c: Mr. Tinnerstet conducted a pre-field ROW inspection prior to formally meeting with the operator. Operator field personnel ask to explain process/steps while conducting regulator station maintenance tasks and other duties associated with ROW checks. Cathodic Protection facility testing/reads, valve operation, pressure regulation set-point and lock-up checks conducted, and testing equipment calibration checked.

d: none noted

e: Inspection was of adequate length considering that some pre-inspection work was completed prior to the site visit.

- 4** From your observation 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, Mr. Tinnerstet has adequate knowledge of the pipeline safety program and regulations.

The WUTC program utilizes a "Draft" style process to assign upcoming calendar year inspection assignments. This process

allows inspection staff to select their preferred assignments in order of their seniority within the safety program. Mr. Tinnerstet is the least ranking member so may not always have the opportunity to get exposed to the various gas and hazardous liquid pipeline systems operating within the state. A suggestion made to the PM to reconsider the process for possible alternatives that provide less senior individuals with a more well rounded experience.

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- 5 Did the inspector conduct an exit interview, including identifying probable violations? (If inspection is not totally completed the interview should be based on areas covered during time of field evaluation) 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The inspection was not fully completed at the time of the field evaluation but the operator was provided a daily briefing on items covered and issues identified. The inspector communicated to the operator that some of the initial findings necessitated a discussion with his superiors prior to making any final decisions on inspection results. A formal exit will be conducted once those decisions have been made.

Possible PV's and AOC's identified related to insufficient O&M manual, lack of records indicating no emergency response training conducted for operator personnel, certain construction records from original pipeline installation missing, and due-date for one individual OQ task training has exceeded re-qualification due date.

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- 6 Was inspection performed in a safe, positive, and constructive manner ? Info Only Info Only  
Info Only = No Points
- a. No unsafe acts should be performed during inspection by the state inspector
  - b. What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)
  - c. Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)
  - d. Other

Evaluator Notes:

Yes. No unsafe acts were observed. The field inspection covered the annual maintenance for regulator stations and the general condition of regulator station facilities including security, signage, pipe to soil interfaces, cathodic protection. The inspector conducted himself in a courteous and professional manner.

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

Evaluator Notes:

No point deductions under Part E. One recommendation made to PM to revisit process used for assigning inspection work to pipeline staff. Refer to question E.4 for specifics.

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



**PART F - Damage prevention and Annual report analysis**

**Points(MAX) Score**

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- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | 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:

Items a thru j covered in the program's Annual Review Checklist Damage Prevention Data section, with additional elements from Q1 and Q2. Also addressed during annual operator seminar. Had discussion with PM regarding preliminary CY2021 damage prevention annual report data indicating that three of the four large LDC's exceed the national average for damages caused due to One-call Notification Practices not being sufficient by between 10 and 18%. Two of the four LDC's have categorized damages under 'Other' from between 1 and 5% above the national average.

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|----------|--|---|---|
| <b>2</b> | Has the state verified that the operators analyze excavation damages for the purpose of determining root causes and minimizing the possibility of a recurrence? (192.617)<br>Has the state verified that the operators have appropriately identified excavators who have repeatedly violated one-call laws and damaged their facilities. Have the operators taken steps to mitigate that risks? (192.1007)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

This is covered in their Annual Review Checklist Damage Prevention Data section, with additional elements from Q1 and Q2.

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|----------|---|---|---|
| <b>3</b> | Has the state reviewed the operator's annual report pertaining to Part D - Excavation Damage?<br>Yes = 4 No = 0 Needs Improvement = 1-3<br>a. Is the information complete and accurate with root cause numbers?<br>b. Has the state evaluated the causes for the damages listed under "One-Call Notification Practices Not Sufficient" (Part D.1.a)?<br>c. Has the state evaluated the causes for the damages listed under "Locating Practices Not Sufficient" (Part D.1.b)? For each operator, does the state review the following?<br>d. Is the operator or its locating contractor(s) qualified and following written procedures for locating and marking facilities?<br>e. Is the operator appropriately requalifying locators to address performance deficiencies?<br>f. What is the number of damages resulting from mismarks?<br>g. What is the number of damages resulting from not locating within time requirements (no-shows)?<br>h. Is the operator appropriately addressing discovered mapping errors resulting in excavation damages?<br>i. Are mapping corrections timely and according to written procedures?<br>j. Has the state evaluated the causes for the damages listed under "Excavation Practices Not Sufficient" (Part D.1.c)? | 4 | 4 |
|----------|---|---|---|

Evaluator Notes:

Items a thru j covered in the program's Annual Review Checklist Damage Prevention Data section, with additional elements from Q1 and Q2. Also addressed during annual operator seminar. Had discussion with PM regarding preliminary CY2021 damage prevention annual report data indicating that three of the four large LDC's exceed the national average for damages caused due to One-call Notification Practices not being sufficient by between 10 and 18%. Two of the four LDC's have categorized damages under 'Other' from between 1 and 5% above the national average.

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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?<br>Yes = 2 No = 0 Needs Improvement = 1<br>a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public. | 2 | 2 |
|----------|--|---|---|



- b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages?
- c. Has the state evaluated which of the following best describes the reason for the excavation damages; i.e., operator or contractor not following written procedures, failure to maintain marks, failure to support exposed facilities, failure to use hand tools were required, failure to test-hole (pot hole), improper backfilling practices, failure to maintain clearance or insufficient excavation practices.
- d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?

Evaluator Notes:

"Yes. No change from prior years. Mandatory reporting via the UTC's Virtual DIRT. Aggregated data is used to identify needs and trends. Results are posted on the UTC web site. This data and trending is also reflected on the Annual Review Checklist, and presented during their annual operator seminar. Outside of the annual review process, the program routinely works with operators when Annual Reports and DIRT reports are vague or do not demonstrate the level of detail they want from operators. Also present detailed trending at the annual operators meeting/seminar. The program has made progress with excavator/contractors filing complaints with the Dig Law Safety Committee for operator failures (mismarks/late/no-show). According to the PM, for several years contractors were hesitant to report utilities to the safety committee for failure to locate in a timely/accurate manner, or for no-shows. Jurisdictional operator penalties assessed in 2021:

- o Avista 4 penalties for \$20K.
- o PSE: 5 penalties for \$30K"

**5** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues. No point deductions under Part F.

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



**PART G - Interstate Agent/Agreement States**

**Points(MAX) Score**

- 1** Were all inspections of interstate pipelines conducted using the Inspection Assistant program for documenting inspections? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

Yes. IA was utilized to document inspection results.

- 2** If inspections were conducted independent of a PHMSA team inspection was notice of all identified probable violations provided to PHMSA within 60 days? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

No independent inspection conducted.

- 3** If inspections were conducted independent of a PHMSA team inspection was PHMSA immediately notified of conditions which may pose an immediate safety hazard to the public or environment? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

No independent inspections were conducted requiring immediate notification to PHMSA.

- 4** If inspections were conducted independent of a PHMSA team inspection did the state coordinate with PHMSA if inspections not were not included in the PHMSA Inspection Work Plan? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

The program performed field site-visits involving two IM anomaly digs, one SRCR, and as part of the scheduled Williams Integrated Inspection.

- 5** Did the state take direction from and cooperate with PHMSA for all incident investigations conducted on interstate pipelines? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

Yes. One SRCR reported and investigated in CY2021. No interstate incidents reported in CY2021.

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

Evaluator Notes:

No issues.

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

