



U.S. Department  
of Transportation  
Pipeline and  
Hazardous Material  
Safety Administration

1200 New Jersey Ave, SE  
Washington, D.C. 20590

2007 Natural Gas Pipeline Safety Program Evaluation  
for  
Washington Utilities and Transportation Commission

Document Legend:  
PART:

- O -- Representative Date and Title Information
- A -- General Program Compliance
- B -- Inspections(Procedures,Records,forms)
- C -- LNG Inspections
- D(1) -- Compliance 60105(a) States
- D(2) -- Compliance 60106(a) States
- D(3) -- Compliance-Interstate Agents
- E -- Incident Investigations
- F -- Field Inspection

**2007 Natural Gas Pipeline Safety Program Evaluation -- CY 2007  
(Natural Gas)**

**State Agency:** Washington

**Rating:**

**Agency Status:**

**60105(a): YES 60106(a): NO Interstate Agent: YES**

**Date of Visit:** 03/31/2008 - 07/25/2008

**Agency Representative:** Dave Lykken

**PHMSA Representative:** Tom Finch

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

**Name/Title:** Mr. Mark Sidran, Chairman  
**Agency:** Washington Utilities & Transportation Commission  
**Address:** 1300 S. Evergreen Park Dr. S.W.  
**City/State/Zip:** Olympia, Washington 98504

**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 2007 (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. Circle the correct answer; then place the score in the points column. 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, delete the question and deduct the points from the total possible points. 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. Questions 5,6 and 7 are provided for scoring this portion of the field inspection. In completing PART F, the PHMSA representative should include a written summary which thoroughly documents the inspection.

**Scoring Summary**

<b>PART</b>		<b>Possible</b>	<b>Points Scored</b>
A	General Program Compliance	42	42
B	Inspections(Procedures,Records,forms)	38	38
C	LNG Inspections	13	13
D(1)	Compliance 60105(a) States	17	17
D(2)	Compliance 60106(a) States	0	0
D(3)	Compliance-Interstate Agents	20	20
E	Incident Investigations	13	13
F	Field Inspection	16	16
<b>TOTAL</b>		<b>159</b>	<b>159</b>
<b>State</b>	.....		<b>100</b>

# PART A - General Program Compliance

Points(MAX)

Score

Improvement = 2 Yes = 8 No = 0 Needs Minor Improvement = 3-7 Needs Major Improvement = 2 Yes = 8 No = 0 Needs Minor Improvement = 3-7 Needs Major

8

8

## A.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 parentheses.)

- a State Jurisdiction and agent status over gas facilities(1)
- a. State Jurisdiction and agent status over gas facilities(1)
- b Total state inspection activity(2)
- b. Total state inspection activity(2)
- c Gas facilities subject to state safety jurisdiction(3)
- c. Gas facilities subject to state safety jurisdiction(3)
- d Gas pipeline incidents(4)
- d. Gas pipeline incidents(4)
- e State compliance actions(5)
- e. State compliance actions(5)
- f State record maintenance and reporting(6)
- f. State record maintenance and reporting(6)
- g State employees directly involved in the gas pipeline safety program(7)
- g. State employees directly involved in the gas pipeline safety program(7)
- h State compliance with Federal requirements(8)
- h. State compliance with Federal requirements(8)

### SLR NOTES:

Supervisors and clerical should be more like 70 % gas and 30% liquids instead of 50% and 50%.

## A.2

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

Did the state have an adequate mechanism to track 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)? (Chapter 6)

1

1

### SLR NOTES:

Yes

## A.3

Yes = 2 No = 0 Yes = 3 No = 0 Needs Improvement = 1

Did the state take appropriate follow-up actions related to the operator incident reports? (Chapter 6)

3

3

### SLR NOTES:

Yes per the reports they make a judgement call if they need to investigate or not.

## A.4

Yes = 1 No = 0 Yes = 5 No = 0

Has the state held a pipeline safety T&Q 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 three calendar years.) (Chapter 8.5)

5

5

### SLR NOTES:

Last held October 25, 2005 in Seatac. Their next T&Q seminar is set for May 14th and 15th, 2008 in Renton, WA.

## A.5

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

Were pipeline safety program files well-organized and accessible? (Note: This also includes electronic files) (Chapter 5)

2

2

### SLR NOTES:

Yes.

<b>A.6</b>	Yes = 1 No = 0 Yes = 5 No = 0 Needs Improvement = 3 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)	5	5
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**SLR NOTES:**

Yes the records and the discussions with Dave Lykken the Acting Program indicated adequate knowledge.

<b>A.7</b>	Yes = 5 No = 0 Needs Improvement = 3 Yes = 1 No = 0 Did the state encourage and promote programs to prevent damage to pipeline facilities as a consequence of demolition, excavation, tunneling, or construction activity? (Chapter 7.1)	5	5
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**SLR NOTES:**

Yes. Per their Damage Strategy & Plan. Establish Excavator Complaint Hotline. Formalized process for involving the Attorney General/Communications with excavators warning letters. Tim Sweeney guided them and worked with them on and toward the 9 elements. No state agency is exempt from this but no state agency has completed authority over the state damage prevention program. Identifying and fining the repeat offenders.

<b>A.8</b>	Yes = 5 No = 0 Yes = 1 No = 0 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? (If no items are requested in letter, mark as "Yes") (Chapter 8.1)	5	5
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**SLR NOTES:**

Responded on January 7th to our December 14th Letters.

<b>A.9</b>	Yes = 2 No = 0 Need Improvement = 1 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? (Chapter 8.1)	2	2
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**SLR NOTES:**

Yes because no specific items were listed in the Chairman's Letter. They addressed my issues and corrected the inspecting within the time frame of procedures.

<b>A.10</b>	Yes = 5 No = 0 Yes = 5 No = 0 Has each inspector fulfilled the 3 year T&Q training requirement? If No, has the state been granted a waiver regarding T&Q courses by the Associate Administrator for Pipeline Safety? (NOTE: If the State has new inspectors who have not attended all T&Q courses, but are in a program which will achieve the completion of all applicable courses within 3 years of employment, or if a waiver has been granted by the Associate Administrator for Pipeline Safety, please answer yes.) (Chapter 4.4)	5	5
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**SLR NOTES:**

Yes Vinsel has until September 2009 and Zuehlke has until August, 2010.

<b>A.11</b>	Information Only = No Points Info Only = No Points Brief Description of Non-T&Q training Activities	-	-
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For State Personnel:

NACE CP Level 2 Course for Jones and Subsits.

NTSB Human Fatigue Factors/Congenitive Interviewing Techniques Courses for S. Zuehlke & Lex Vinsel.

National Welding Inspection School for Vinsel.

For Operators:

None

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

Nothing other than Damage Prevention Workshops.

**SLR NOTES:**

<b>A.12</b>	Yes = 1 No = 0 Did the lead inspectors complete all required T&Q OQ courses and Computer based training (CBT) before conducting OQ inspections? (Chapter 4.4.1)	1	1
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**SLR NOTES:**

Everybody except Stephanie Zuehlke has completed OQ training and she has not performed OQ inspections.

<b>A.13</b>	Information Only = No Points Did the lead inspectors complete all required T&Q Integrity Management Program (IMP) Courses/Seminars and CBT before conducting IMP inspections? (Chapter 4.4.1)	-	-
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**SLR NOTES:**

Scott Rukke and Joe Subsits have completed all required T&Q Integrity Management Program (IMP) Courses/Seminars and CBT before conducting IMP inspections.

**A.14** Information Only = No Points Info Only = No Points  
 What were the major accomplishments for the year being evaluated? (Describe the accomplishments.) - -

**SLR NOTES:**

They are continuing to work on their Damage Prevention Plan to try to meet PHMSA's 9 elements. Sent letters to excavators concerning one call enforcement.

**A.15** Yes = 1 No = 0 Information Only = No Points  
 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.)) - -

**SLR NOTES:**

Damage Prevention Strategy and Plan. They issued and got approved a \$1.25 million fine against PSE which includes a management audit of PSE.

**A.16** Information Only = No Points  
 What progress has the state made toward achieving an effective Damage Prevention program as described in 60134(b) "Damage Prevention Program Elements"? (9 Elements) - -

**SLR NOTES:**

Damage Prevention Strategy and Plan. Tim Sweeney guided them and worked with them on and toward the 9 elements. No state agency is exempt from this but no state agency has completed authority over the state damage prevention program. Identifying and fining the repeat offenders.

**A.17** Info Only = No Points Information Only = No Points  
 Part-A General comments/Regional Observations/Computer Inventory - -

**SLR NOTES:**

Computer Inventory:

Quantity	Description	Year	Make	Model	Serial Number	Federal Tag #
1	Dell Processor		Dell		N67NXD51	TSC#98823
1 set	Speakers	Dell		-	-	
1	Samsung Flat Screen Monitor			Samsung	MY19HCHX505286	TSC#98843
1	HP PSC 2410 (All in one printer)			HP	MY41SJ36JF	TSC#98914
1	HP Scanjet Scanner 4600			HP	CN3BMB7638	TSC#98794
1	HP Scanjet Scanner		HP		CN2251606H	TSC#92227

Total points scored for this section:42  
 Total possible points for this section: 42

**PART B - Inspections(Procedures,Records,forms)**

**Points(MAX) Score**

<b>B.1</b>	Yes = 6.5 No = 0 Needs Improvement = 50% Deduction Yes = 5 No = 0 Needs Improvement = 1-4 Does the State have a written inspection plan to complete the following? (Chapter 5.1)	5	5
a. Standard Inspections.....	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"/>		
b. IMP Inspections.....	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"/>		
c. OQ Inspections.....	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"/>		
d. Construction Inspections.....	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"/>		
e. Other integrity inspections and incident investigations.....	Yes <input checked="" type="radio"/> No <input type="radio"/> Needs Improvement <input type="radio"/>		

**SLR NOTES:**

Yes per their 2007 Inspection Priority assignments and their Policies and Procedures Manual.

<b>B.2</b>	Yes = 2 No = 0 Needs Improvement = 50% Deduction Yes = 2 No = 0 Needs Improvement = 1 Did the written Procedures for selecting operators adequately address key concerns? (Chapter 5.1)	2	2
a. Length of time since last inspection.....	Yes <input checked="" type="radio"/> No <input type="radio"/> Needs Improvement <input type="radio"/>		
a. Length of time since last inspection.....	Yes <input checked="" type="radio"/> No <input type="radio"/> Needs Improvement <input type="radio"/>		
b. History of Operator/unit and/or location (including leakage , incident and compliance history).....	Yes <input checked="" type="radio"/> No <input type="radio"/> Needs Improvement <input type="radio"/>		
b. History of Operator/unit and/or location (including leakage , incident and compliance history).....	Yes <input checked="" type="radio"/> No <input type="radio"/> Needs Improvement <input type="radio"/>		
c. Type of activity being undertaken by operator (construction etc).....	Yes <input checked="" type="radio"/> No <input type="radio"/> Needs Improvement <input type="radio"/>		
c. Type of activity being undertaken by operator (construction etc).....	Yes <input checked="" type="radio"/> No <input type="radio"/> Needs Improvement <input type="radio"/>		
d. For large operators, rotation of locations inspected.....	Yes <input checked="" type="radio"/> No <input type="radio"/> Needs Improvement <input type="radio"/>		
d. For large operators, rotation of locations inspected.....	Yes <input checked="" type="radio"/> No <input type="radio"/> Needs Improvement <input type="radio"/>		

**SLR NOTES:**

Yes.

<b>B.3</b>	Yes = 3 No = 0 Needs Improvement = 1 Yes = 2 No = 0 Did the state inspect units in accordance with time intervals established in its written procedures? (Chapter 5.1)	3	3
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**SLR NOTES:**

Yes they had one right at the 3 year mark (BP Pipelines Ferndale).

<b>B.4</b>	Yes = 1 No = 0 Yes = 4 No = 0 Needs Improvement = 1-3 Did the state inspection forms cover all applicable code requirements addressed on Federal Inspection forms? (Chapter 5.1(3))	4	4
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**SLR NOTES:**

Yes

<b>B.5</b>	Yes = 4 No = 0 Needs Improvement = 1-3 Yes = 1 No = 0 Did state complete all portions of all inspection forms? (Chapter 5.1(3))	4	4
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**SLR NOTES:**

Yes they just need to include the name of the inspector and peer reviewer on some of their completed inspection forms.

<b>B.6</b>	Yes = .5 No = 0 Yes = 2 No = 0 Did the state initiate appropriate follow-up actions to Safety Related Condition Reports? (Chapter 6.3)	2	2
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**SLR NOTES:**

They had 2 in 2007 - Northwest Natural Gas and Cascade Natural Gas which they initiated appropriate follow-up actions on.

<b>B.7</b>	Yes = 2 No = 0 Needs Improvement = 1 Yes = .5 No = 0 Did the state adequately review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB)	2	2
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**SLR NOTES:**

It is in and on the inspection checklist. PSE got all cast iron replaced just this last July.

<b>B.8</b>	Yes = .5 No = 0 Yes = 2 No = 0 Needs Improvement = 1 Did the state adequately 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: If state accepts guidelines less stringent than the AGA GPTC Appendix G-18, circle needs improvement) (NTSB)	2	2
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**SLR NOTES:**

Yes up until July, 2007, when all cast iron pipe was replaced.

<b>B.9</b>	Yes = 1 No = 0 Yes = .5 No = 0 Needs Improvement = 1 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)	2	2
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**SLR NOTES:**

Yes per the Advisory Bulletin it should be on the inspection checklist. Dave will remind his inspectors to ask this.

<b>B.10</b>	Yes = 2 No = 0 Needs Improvement = 1 Yes = 1 No = 0 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 Part 192.617? (NTSB)	2	2
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**SLR NOTES:**

Yes it is in the procedures checklist 192.617 and should be in the records checklist.

<b>B.11</b>	Yes = 1 No = 0 Needs Improvement = .5 Yes = 2 No = 0 Needs Improvement = 1 Has the state reviewed underground directional drilling/boring procedures of each operator and their contractors to determine if they include effective actions to protect their underground facilities from the dangers posed by directional drilling and other trenchless technologies? These procedures should include, but are not limited to, accurately locating underground piping and reviewing the qualifications of personnel performing the work. (NTSB)	2	2
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**SLR NOTES:**

Yes

<b>B.12</b>	Yes = 5 No = 0 Yes = 1 No = 0 Needs Improvement = .5 Was the ratio acceptable of Total inspection Person-days to Total Person-days charged to the program by state inspectors? (Regional director may adjust points for just cause.) (Chapter 4.3)	5	5
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A. Total Inspection Person Days (Attachment 2):

625.80

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

220 X 5.82 = 1280.95

Ratio: A / B

625.80 / 1280.95 = 0.49

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

Points = 5

**SLR NOTES:**

Yes 0.49 is  $>$  0.38 = Yes

<b>B.13</b>	Yes = .5 No = 0 Information Only = No Points Have there been modifications or proposed changes to inspector-staffing levels? (If yes, describe.)	-	-
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**SLR NOTES:**

During August, 2007 they added Stephanie Zuehlke as an inspector.

<b>B.14</b>	Yes = 1 No = 0 Needs Improvement = .5 Yes = 3 No = 0 Needs Improvement = 1 Did the state adequately document sufficient information for probable violations? (Chapter 5.2)	3	3
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**SLR NOTES:**

Yes in all of the inspection folders that i checked they documented information for probable violations very well.

<b>B.15</b>	Yes = 1 No = 0 Information Only = No Points 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?	-	-
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**SLR NOTES:**

Yes they did. I have not had any complaints about the WUTC from our WR OQ Guru.

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<b>B.16</b>	Information Only = No Points Yes = 1 No = 0 Needs Improvement = .5 Did the State submit their replies into Integrity Management Database (IMDB) in response to the Operators notifications for their integrity management program?	-	-
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**SLR NOTES:**

They did not have any Gas Integrity Management inspections in 2007.

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<b>B.17</b>	Yes = 1 Information Only = No Points No = 0 Have the IMP Federal Protocol forms been uploaded to the Integrity Management Database(IMDB)?	-	-
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**SLR NOTES:**

They did not have any Gas Integrity Management inspections in 2007.

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<b>B.18</b>	Information Only = No Points Yes = 1 No = 0 Needs Improvement = .5 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? (eg. encourage submission of data to PPDC)	-	-
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**SLR NOTES:**

They do that under their WUTC Advisory Bulletin. Also, per a fairly new WUTC rule their operators are to report any pipeline material defects.

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<b>B.19</b>	Information Only = No Points Yes = 1 No = 0 Needs Improvement = .5 Part-B General Comments/Regional Observations	-	-
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**SLR NOTES:**

Total points scored for this section:38  
Total possible points for this section: 38

## PART C - LNG Inspections

Points(MAX)      Score

<b>C.1</b>	Yes = 1 No = 0 Needs Improvement = .5 Yes = 2 No = 0 Did the state inspect LNG facilities in accordance with time intervals in its written procedures? (Specify frequency in notes) (Chapter 5.1)	2	2
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**SLR NOTES:**

Yes they have performed LNG inspections on an annual basis.

<b>C.2</b>	Yes = 2 No = 0 Yes = 1 No = 0 Did the written procedures for selecting LNG operators/units adequately address key concerns? (Chapter 5.1)	2	2
	a.Length of time since last inspection.....	Yes <input checked="" type="radio"/> No <input type="radio"/>	
	b.History of Operator/Unit and/or location(leakage incident, and compliance history).....	Yes <input checked="" type="radio"/> No <input type="radio"/>	

**SLR NOTES:**

Yes because they only have one intrstate LNG facility.

<b>C.3</b>	Yes = 1 No = 0 Needs Improvement = .5 Yes = 3 No = 0 Needs Improvement = 1 or 2 Did the state utilize Federal Inspection forms? If the state utilized alternative inspection forms, did the inspection forms cover all code requirements addressed on federal inspection forms? (Chapter 5.1(3))	3	3
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**SLR NOTES:**

Yes they utilize the federal inspection form with the state rules added in.

<b>C.4</b>	Yes = 1 No = 0 Yes = 1 No = 0 Needs Improvement = .5 Did the state fill out applicable inspection form(s) or checklist(s) covering the design, construction, operation, and maintenance of LNG facilities in sufficient detail? (Chapter 5.1)	1	1
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**SLR NOTES:**

Yes

<b>C.5</b>	Yes = 1 No = 0 Yes = 3 No = 0 Needs Improvement = 1 Do inspection records sufficiently document review of O&M plans, Emergency plans, personnel qualification, and training? (Chapter 5.1(3))	3	3
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**SLR NOTES:**

Yes

<b>C.6</b>	Yes = 2 No = 0 Yes = 1 No = 0 Do the inspection records adequately document the discovery and nature of probable violations? (Chapter 5.2)	2	2
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**SLR NOTES:**

Yes

<b>C.7</b>	Yes = 1 No = 0 Needs Improvement = .5 Information Only = No Points Part C: General Comments/Regional Observations	-	-
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**SLR NOTES:**

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

**PART D(1) - Compliance 60105(a) States****Points(MAX)****Score**

<b>D(1).1</b>	Yes = 2 No = 0 Needs Improvement = 1 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 States Participating in the Pipeline Safety Program"? (Chapter 5.1)	2	2
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**SLR NOTES:**

Yes in their Compliance and Enforcement Manual.

<b>D(1).2</b>	Yes = 2 No = 0 Needs Improvement = 1 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))	2	2
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**SLR NOTES:**

Yes

<b>D(1).3</b>	Yes = 2 No = 0 Needs Improvement = 1 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))	2	2
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**SLR NOTES:**

They have mechanism and procedure but need a little more detail in this procedure.

<b>D(1).4</b>	Yes = 4 No = 0 Needs Improvement = 1-3 Did the State issue any compliance actions in the last 3 years? (Note: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation)	4	4
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**SLR NOTES:**

Yes they had 4 Commission Orders in 2007 and 8 more total in 2005 and 2006.

<b>D(1).5</b>	Yes = 2 No = 0 Needs Improvement = 1 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"?	2	2
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**SLR NOTES:**

Yes per their database in the project tracking system.

<b>D(1).6</b>	Information Only = No Points 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 state enforcement procedures)	-	-
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**SLR NOTES:**

They have managed to come up with a Settlement Agreements similar Consent Agreements.

<b>D(1).7</b>	Yes = 2 No = 0 Needs Improvement = 1 Did the state adequately document the resolution of probable violations? (Chapter 5.1(6))	2	2
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**SLR NOTES:**

Yes

<b>D(1).8</b>	Yes = 1 No = 0 Were compliance actions sent to a company officer (Manager or board member if municipal/government system)? (Chapter 5.1(4))	1	1
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**SLR NOTES:**

Yes

<b>D(1).9</b>	Yes = 2 No = 0 Needs Improvement = 1 Did the compliance proceedings give reasonable due process to all parties? (Check state enforcement procedures)	2	2
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**SLR NOTES:**

Yes

<b>D(1).10</b>	Information Only = No Points Part D(1): General Comments/Regional Observations	-	-
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**SLR NOTES:**

Total points scored for this section: 17

Total possible points for this section: 17

**PART D(2) - Compliance 60106(a) States****Points(MAX)****Score**


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<b>D(2).1</b>	Yes = 2 No = 0 Needs Improvement = 1 Did the state use an inspection form, approved by the Regional Director, covering applicable regulations in sufficient detail?	2	<b>NA</b>
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**SLR NOTES:**


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<b>D(2).2</b>	Yes = 2 No = 0 Needs Improvement = 1 Are results adequately documented demonstrating inspection units were reviewed in accordance with state inspection plan?	2	<b>NA</b>
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**SLR NOTES:**


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<b>D(2).3</b>	Yes = 5 No = 0 Needs Improvement = 2 Were any cases referred to PHMSA for compliance in the last 3 years? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.)	5	<b>NA</b>
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**SLR NOTES:**


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<b>D(2).4</b>	Yes = 2 No = 0 Needs Improvement = 1 Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment?	2	<b>NA</b>
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**SLR NOTES:**


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<b>D(2).5</b>	Yes = 2 No = 0 Needs Improvement = 1 Did the state give written notice to PHMSA within 60 days of all probable violations found?	2	<b>NA</b>
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**SLR NOTES:**


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<b>D(2).6</b>	Yes = 5 No = 0 Needs Improvement = 2 Did the state initially submit adequate documentation, on report format approved by Regional Director, to support compliance action by PHMSA on probable violations?	5	<b>NA</b>
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**SLR NOTES:**


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<b>D(2).7</b>	Information Only = No Points Part D(2): General Comments/Regional Observations	-	-
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**SLR NOTES:**

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

**PART D(3) - Compliance-Interstate Agents****Points(MAX)****Score**

<b>D(3).1</b>	Yes = 2 No = 0 Needs Improvement = 1 Did the state use an inspection form, approved by the Regional Director, covering applicable regulations in sufficient detail in accordance with the interstate agent agreement?	2	2
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**SLR NOTES:**

Yes

<b>D(3).2</b>	Yes = 2 No = 0 Needs Improvement = 1 Are results adequately documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"?	2	2
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**SLR NOTES:**

Yes

<b>D(3).3</b>	Yes = 2 No = 0 Needs Improvement = 1 Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form?	2	2
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**SLR NOTES:**

Yes

<b>D(3).4</b>	Yes = 5 No = 0 Needs Improvement = 2 Were any cases referred to PHMSA for compliance in the last 3 years? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.)	5	5
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**SLR NOTES:**

Yes

<b>D(3).5</b>	Yes = 2 No = 0 Needs Improvement = 1 Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment?	2	2
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**SLR NOTES:**

Yes especially concerning the 2 Safety Related Condition Reports.

<b>D(3).6</b>	Yes = 2 No = 0 Needs Improvement = 1 Did the state give written notice to PHMSA within 60 days of all probable violations found?	2	2
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**SLR NOTES:**

Yes

<b>D(3).7</b>	Yes = 5 No = 0 Needs Improvement = 2 Did the state initially submit adequate documentation, on report format approved by Regional Director, to support compliance action by PHMSA on probable violations?	5	5
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**SLR NOTES:**

Yes on our federal violation report.

<b>D(3).8</b>	Information Only = No Points Part D(3): General Comments/Regional Observations	-	-
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**SLR NOTES:**

Total points scored for this section:20

Total possible points for this section: 20

## PART E - Incident Investigations

Points(MAX)

Score

<b>E.1</b>	Yes = 2 No = 0 Needs Improvement = 1 Yes = 2 No = 0 Needs Improvement = 1 Are state personnel following the procedures for Federal/State cooperation in case of an incident (Appendix in "Guidelines for States Participating in the Pipeline Safety Program")? (Chapter 6.1)	2	2
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**SLR NOTES:**

Yes, there were no reportable Gas Incidents but there were 2 SRCRs submitted in 2007.

<b>E.2</b>	Yes = 2 No = 0 Yes = 2 No = 0 Needs Improvement = 1 Are state personnel familiar with the jurisdictional authority and Memorandum of Understanding between NTSB and PHMSA (Appendix in "Guidelines for States Participating in the Pipeline Safety Program")? (Chapter 6 - Appendix D)	2	2
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**SLR NOTES:**

Yes I asked Joe Subsits this question and he answered it correctly.

<b>E.3</b>	Yes = 2 No = 0 Needs Improvement = 1 Yes = 2 No = 0 Needs Improvement = 1 Did the state keep adequate records of incident notifications received?	2	2
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**SLR NOTES:**

Yes on the SRC reports.

<b>E.4</b>	Yes = 1 No = 0 Yes = 2 No = 0 Needs Improvement = 1 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?	2	2
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**SLR NOTES:**

Yes on the SRCRs.

<b>E.5</b>	Yes = 5 No = 0 Needs Improvement = 2 Yes = 2 No = 0 Were investigations thorough and conclusions and recommendations documented in an acceptable manner?	5	5
	a. Observations.....	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 type="radio"/> No <input checked="" type="radio"/> Needs Improvement <input type="radio"/>	

**SLR NOTES:**

There are no known methods to prevent recurrences of Acts of Nature.

<b>E.6</b>	Info Only = No Points Yes = 3 No = 0 Needs Improvement = 1 Did the state follow-up on any violations found during an incident investigation?	3	NA
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**SLR NOTES:**

NA there weren't any violations found.

<b>E.7</b>	Information Only = No Points Did the state take appropriate follow-up actions related to Operator incident reports?	-	-
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**SLR NOTES:**

Yes concerning the SRC reports. This question is the same as our question # A.3.

<b>E.8</b>	Information Only = No Points Did the state work with PHMSA to ensure that incident/accident reports are accurate and updated?	-	-
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**SLR NOTES:**

There were no incidents in 2007 but they did work with PHMSA to ensure that Safety Related Condition reports are accurate and updated.

<b>E.9</b>	Information Only = No Points Part E: General Comments/Regional Observations	-	-
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**SLR NOTES:**

Total points scored for this section: 13

Total possible points for this section: 13

# PART F - Field Inspection

Points(MAX)      Score

**F.1**      Info Only = No Points Information Only = No Points  
 Operator,Inspector,Location,Date,PHMSA Representative Information      -      -

Name of Operator Inspected:  
 Williams Gas pipelines

Name of State Inspector(s) Observed:  
 Joe Subits

Location of Inspection:  
 Williams Headquarters in Houston & Salt Lake City, Utah, field in Redmond & Spokane, WA.

Date of Inspection:  
 June 9-13, July 7-11 & 21-25, 2008

Name of PHMSA Representative:  
 Kimbra Davis and Brent Brown

**SLR NOTES:**

Kimbra Davis and Brent Brown observed Joe subsits when he participated as a team member conducting an Inspection Integration (II) inspection.

Per the II Team Lead inspector -

"Joe participated in two weeks of HQ II as well as field inspections. The team worked to complete the time dependent threats, assessment and repair, control room management, public awareness, and other modules. Joe was very knowledgeable in the application of the regulations and particularly strong in his contributions to our team with respect to his expertise in the Williams system in WA. He was definitely an asset to our team and I was very happy to have him participate."

**F.2**      Yes = 1 No = 0 Yes = 3 No = 0  
 Did the inspector use an acceptable inspection form/checklist? (New regulations shall be incorporated)      3      3

**SLR NOTES:**

Yes the new II Inspection form.

**F.3**      Yes = 2 No = 0 Yes = 2 No = 0  
 Did the inspector thoroughly document results of the inspection?      2      2

**SLR NOTES:**

Yes per the team lead the WUTC inspector documented very well.

**F.4**      Yes = 2 No = 0 Yes = 1 No = 0  
 Is the inspector using the inspection form/checklist as a guide for the inspection?      1      1

**SLR NOTES:**

Yes

**F.5**      Info Only = No Points Yes = 2 No = 0 Needs Improvement = 1  
 Did the inspector check to assure the operator is following its written procedures for (check all that apply):      2      2

- 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. Liason 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

**SLR NOTES:**

Yes per his field inspections of the Redmond and Spokane district's with our Brent Brown.

**F.6**

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

Did the inspector assure the operator's procedures are adequate for (check all that apply):

2

2

- 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. Liason 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

**SLR NOTES:**

Yes

**F.7**

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

Did the inspector check to assure the operator's records verify code and procedures are followed (check all that apply):

2

2

- 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. Liason 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

**SLR NOTES:**

Yes

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<b>F.8</b>	Yes = 2 No = 0 Yes = 1 No = 0 Did the inspector have adequate knowledge of the pipeline safety program goals and regulations?	2	2
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**SLR NOTES:**

Yes

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<b>F.9</b>	Yes = 1 No = 0 Information Only = No Points What is the inspector observing in the field? (Review the summary.)	-	-
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**SLR NOTES:**

Kimbra Davis and Brent Brown observed Joe subsits when he participated as a team member conducting an Inspection Integration (II) inspection.

Per the II Team Lead inspector -

"Joe participated in two weeks of HQ II as well as field inspections. The team worked to complete the time dependent threats, assessment and repair, control room management, public awareness, and other modules. Joe was very knowledgeable in the application of the regulations and particularly strong in his contributions to our team with respect to his expertise in the Williams system in WA. He was definitely an asset to our team and I was very happy to have him participate."

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<b>F.10</b>	Yes = 1 No = 0 Info Only = No Points Did the inspector conduct an exit interview?	1	1
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**SLR NOTES:**

Yes with the II Inspection team.

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<b>F.11</b>	Info Only = No Points Yes = 1 No = 0 During the exit interview, did the inspector identify probable violations found during the inspection?	1	1
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**SLR NOTES:**

Yes the inspector and team indentified Notice of ammendment (NOA) violations that they found during the inspection.

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<b>F.12</b>	Info Only = No Points Information Only = No Points Part F: Summary of Comments (Written Summary Required)	-	-
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**SLR NOTES:**

Kimbra Davis and Brent Brown observed Joe subsits when he participated as a team member conducting an Inspection Integration (II) inspection.

Per the II Team Lead inspector -

"Joe participated in two weeks of HQ II as well as field inspections. The team worked to complete the time dependent threats, assessment and repair, control room management, public awareness, and other modules. Joe was very knowledgeable in the application of the regulations and particularly strong in his contributions to our team with respect to his expertise in the Williams system in WA. He was definitely an asset to our team and I was very happy to have him participate."

Total points scored for this section: 16  
Total possible points for this section: 16