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NATURAL GAS PIPELINE SAFETY INSPECTION AND ENFORCEMENT PROCEDURES

Revised APRIL 2024

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REVISIONS HISTORY

<i>EN</i>	<i>Revision Description</i>	<i>Date</i>	<i>Prepared by</i>	<i>Approved by</i>
10	Drug and Alcohol Records	12/01/2010 06/08/2015	Ahmadou L. Bagayoko Amrik S. Kaisth	Manmohan Singh M. Singh
11	Contractor Drug Program	12/01/2010	Ahmadou L. Bagayoko	Manmohan Singh
16	Utility Records Inspection	12/01/2010	Ahmadou L. Bagayoko	Manmohan Singh
17	Comprehensive Evaluation	12/01/2010	Ahmadou L. Bagayoko	Manmohan Singh
31	Welding Inspection	12/01/2010	Ahmadou L. Bagayoko	Manmohan Singh
33	Steel Construction	12/01/2010 06/01/2015	Ahmadou L. Bagayoko Amrik S. Kaisth	Manmohan Singh M. Singh
34	Plastic Pipeline Construction	11/19/2011 12/28/2012 06/01/2015	Ahmadou L. Bagayoko Amrik S. Kaisth	Manmohan Singh M.Singh
36	Customer Response/Leak Survey	12/02/2010	Ahmadou L. Bagayoko	Manmohan Singh
37	Small Operator/Master Meter	11/15/2022	Ahmadou L. Bagayoko	Udeozo Ogbue
39	Damage Prevention	04/06/2014	Manmohan Singh	Udeozo Ogbue
41	Corrosion Control	12/02/2010	Ahmadou L. Bagayoko	Manmohan Singh
42	Leak Repair Inspection	12/02/2010	Ahmadou L. Bagayoko	Manmohan Singh
43	Regulator Station Field	12/02/2010	Ahmadou L. Bagayoko	Manmohan Singh
44	Gas Leak Field	12/02/2010	Ahmadou L. Bagayoko	Manmohan Singh
46	Emergency Valve Inspection	06/01/2015	Amrik S. Kaisth	M. Singh
54	Failure Investigation	12/03/2010	Ahmadou L. Bagayoko	Manmohan Singh

54#	Short EN 54 Incident Form (After Hours Notification)	11/15/2022	Ahmadou L. Bagayoko	Udeozo Ogbue
55	Operator Meeting Notes	11/28/2012	Ahmadou L. Bagayoko	Manmohan Singh
56	Anode Installation	12/28/2012	Ahmadou L. Bagayoko	Manmohan Singh
57	Follow up Inspection	3/01/2016	Ahmadou L. Bagayoko	Manmohan Singh
58	Referee Meter Test	12/03/2010	Ahmadou L. Bagayoko	Manmohan Singh
59	Up rating / MAOP Inspection	12/03/2010	Ahmadou L. Bagayoko	Manmohan Singh
60	Plastic Joining Inspection/Testing	8/30/2021	Ahmadou L. Bagayoko	Udeozo Ogbue
Forms/PHMSA Inspection Forms/Protocols				
62*	Integrity Management-Procedure and Records (OPS Protocol)			
66*	Public Awareness Program (RP1162)	8/30/2021	Ahmadou Bagayoko	Udeozo Ogbue
32*	OQ OPS Protocol			
32.9*	OQ Field Inspections			
35*	Comprehensive Drug Program			
70*	Distribution IMP (DIMP)			
67*	Control Room Mgt.			

* Latest DOT Forms

AUTHORITY

The Public Service Commission of the District of Columbia (“Commission”), under 49 U.S.C. 60105 Certification provides regulatory jurisdiction and responsibility with respect to intrastate gas facilities operated by utilities in the District of Columbia. By order dated August 15, 1983, in Formal Case No.799, (modified in April 3, 1991 in Formal Case No. 712), the Commission adopted Title 49 CFR §190, §191, §192, and §199 and Part 40 of the Code of Federal Regulations as the Gas Pipeline Safety Code (“Code”) of the District of Columbia. Authority was delegated to the Office of Engineering, now Office of Compliance and Enforcement in the Office

* Forms/PHMSA Inspection Forms/Protocols (See PHMSA Website)

of Technical and Regulatory Analysis, to supervise and administer the Gas Pipeline Safety Code in the District of Columbia.

The Commission has the power to require the maintenance and filing of reports, records, and other prescribed information; to enter upon and inspect, at reasonable times and in a reasonable manner, the pipeline facilities and the pipeline procedures, operation and maintenance records, and other documents (paper and electronic data) relevant to determining compliance with the regulations.

Whenever the Commission finds a particular facility to be hazardous to life or property, it is empowered to require the person operating such facility to take those steps necessary to remove such hazards.

FEDERAL CODE PROVISIONS APPLICABLE (49 CFR per 15 DCMR 2301)

Title 15 of the District of Columbia Municipal Regulations (“DCMR”), Chapter 2301, states: The federal government’s gas safety regulations for transportation of natural and other gas by pipeline, Title 49 CFR, Parts 190 (Pipeline Safety Program Procedures), 191 (Annual Reports and Incident Reports), 192 (Minimum Federal Safety Standards), and 199 (Drug and Alcohol Testing) and Part 40 (Code of Pipeline Safety Regulations) shall be the natural gas pipeline safety standards for intrastate natural gas transmission and distribution facilities subject to the jurisdiction of the Commission, except to the extent that the regulations in this chapter are more stringent.

MISSION OF THE OFFICE OF COMPLIANCE AND ENFORCEMENT

The Office of Compliance and Enforcement (OCE) was established in October 2013 from the former Office of Engineering. The overall focus and mission of OCE is to advise the Commissioners on their mission to protect consumers as well as the physical components and systems that enable safe and reliable natural gas and electricity transportation, and telecommunications services delivery in the District of Columbia.

To accomplish its mission and objective, OCE focuses primarily on field/facilities inspections, records inspections, Operator Qualification inspections, incident investigations, enforcement, compliance audits, compliance reporting, and prioritization and minimization of risks associated with the construction, operation, and maintenance of electric, natural gas, and telecommunications infrastructure and facilities in the District of Columbia.

OBJECTIVE OF THE OFFICE OF COMPLIANCE AND ENFORCEMENT

The objective of the Office of Compliance and Enforcement regarding pipeline safety is to assure that all jurisdictional gas operators in the District of Columbia comply with provisions of the Code as stated in Parts 190, 191, 192, 199, and Part 40.

INSPECTIONS

The Office of Compliance and Enforcement will conduct inspection activities in accordance with Pipeline and Hazardous Materials Safety Administration's ("PHMSA") "Guidelines for States Participating in the Pipeline Safety Program," current version (Guideline Manual), and subsequent revisions.

PURPOSE AND SCOPE OF INSPECTIONS

To provide reasonable assurance that diligent and rigorous inspections and investigations of gas pipeline facilities and procedures are conducted and appropriate enforcement proceedings executed following violation of pipeline safety regulations by jurisdictional gas operators in the District of Columbia.

RESPONSIBILITY

Pipeline Safety Inspector(s) in the Office of Compliance and Enforcement are responsible for:

1. Preparing inspection plans and schedules and identifying natural gas facilities, sites, records, and procedures for inspection
2. Conducting Standard and Comprehensive inspections of natural gas facilities, reviewing Operations and Maintenance ("O&M") procedures and records; and construction and repair activities records
3. Conducting construction inspections of gas facilities
4. Conducting damage prevention inspections of gas facilities. (Part 192-614 and Miss Utility)
5. Responding to gas incidents and conducting incident investigations
6. Preparing, submitting, and filing inspection reports
7. Preparing appropriate evidence and documentation for enforcement proceedings
8. Conducting Integrity Management Program ("IMP") Plan inspections (Procedures and Records) for gas transmission and Distribution Integrity Management Plan ("DIMP") inspections, including field verifications, for gas distribution
9. Conducting Operator Qualification Programs Plan inspections (Procedures and Records), and Field Verification
10. Conducting Operator Public Awareness Programs Plan (Procedures and Records) inspections, and Field Verification.

PROGRAM

OCE's plan for conducting inspections on behalf of the Commission includes:

1. A consideration for conducting periodic inspections of jurisdictional intrastate gas operator according to the attached schedule.
2. A format that provides for a methodical, systematic, and comprehensive inspection of facilities, records, and procedures.
3. A procedure to document the results of each inspection. The Commission has adopted the use of standard protocols for Operator Qualifications & Integrity Management Plan Inspections.
4. A procedure, in the event of non-compliance, of notification and follow-up to ensure that timely corrective action has been taken.

Review of Effectiveness of the Gas Program

On behalf of the Commission, OCE will conduct thorough and periodic formalized review of Operator history/inspection data, violations and enforcement, incidents records/reports, leak data, replacement of cast iron ("CI") and bare steel, damage data and damage prevention best practices. The Commission will review and analyze trends to help minimize risks and enhance effectiveness of pipeline safety program. The Commission will maintain supporting documents in easily accessible manner and format (summary, conclusions, charts/graphs for trends, etc.).

Format

An evaluation of an operator's facilities, procedures and records will be made, with inspection guidelines based upon checklists referenced to the Federal and State Safety Regulations and PHMSA Guidelines for States Participating in the Pipeline Safety Program. (A list of the EN-Forms Checklists is included in the Revisions History Section).

The inspections will include a review of the operator's records and procedures concerning training, operation, maintenance, emergency plans, operator qualification ("OQ"), IMP, and its anti-drug and alcohol plan. OQ, IMP, and Public Awareness Plan (RP 1162) inspections will utilize federal protocols available on PHMSA's website (www.ops.dot.gov/library/forms.htm) and upon completion of OQ inspections, the results will be entered in the OQ database. Field inspections of the operator's facilities and activities will cover the installation and testing of pipeline facilities, and will specifically include corrosion control, pressure regulating station maintenance, leak survey, and leak repair.

TYPES OF INSPECTIONS AND SCHEDULE/FREQUENCY

The jurisdictional intrastate operator(s) in the District of Columbia is/are inspected according to the following schedule (See Table on the following page). The schedule is revised on an as-needed basis upon the results of the inspections and mandates from PHMSA. Inspections may also be initiated as a result of a pipeline accident, incident, or public complaint. Follow-up inspections will be conducted in the event of non-compliance. After enforcement actions have been initiated, follow-up inspections are conducted as necessary to confirm that corrective actions have been completed. The following are the types of inspections we conduct:

- a. Standard Inspections (General Code Compliance) – a comprehensive and thorough review of an operator’s compliance records, operations and maintenance plans, emergency procedures, public awareness plans, drug and alcohol programs and pipeline facilities. This would include corrosion control, leakage surveys (**including surveys in response to public or customer complaints**), overpressure protection and pressure regulating equipment, odorization levels and equipment, repaired and/or active leaks, emergency valves, emergency response, control room management, etc.
- b. Construction Inspections – include construction activities, evaluation of design and the integrity testing of new or replacement facilities.
- c. Operator Training – this would include a staff member making a presentation at an operators’ training/safety meeting, damage prevention conference, etc.
- d. IMP – Integrity Management (**IMP and DIMP**) – these are inspections involving integrity management inspections on Gas Transmission and Gas Distribution lines.
- e. OQ – Operator Qualification – these are inspections of an operator’s plan using the Federal Protocol Elements. If the inspection is spent primarily doing OQ Protocol Elements 9 activities, the time should be reported in this category.
- f. Investigating Incidents/Accidents – this would include any Incident/Accident activities and investigative activities.
- g. Damage Prevention Activities – Inspection and enforcement activities related to inspections and enforcement of 49 CFR Part 192.614.
- h. Compliance Follow-up – Inspections or evaluations to see if actions are completed as requested to an operator from a previous inspection or compliance action.

	TYPES OF INSPECTIONS	MINIMUM FREQUENCY/SCHEDULE
A. Office Inspections		
1	Comprehensive Evaluation (for gas company) EN #17	3 years
2	Records Inspection (corrosion, odorant (Odorization equipment checked to ensure no wide variations in level of odorant introduced), leak survey, valve maintenance, regulator station maintenance, testing, and Emergency Plans) EN #16	1 year
3	Comprehensive Drug and Alcohol Testing Program (Federal Protocols) EN #35	3 years
4	Drug and Alcohol Records Inspections (or Federal Protocols 36 months) EN #10	1 year
5	Follow-Up Inspections (for non-compliance of operators)	As needed
6	Operator Qualification Plan/Records Inspection (Federal Protocols) EN #32	3 years
7	Transmission and Distribution Integrity Management Inspections (IMP & DIMP) (Federal Protocols) EN #62 and #70	3 years
8	Public Awareness Program Inspection (RP1162) (Federal Protocols) EN #66	3 years
9	Damage Prevention (General Inspection) EN #55 OPM	As needed
10	Control Room Management Inspection (Federal Protocols) EN #71	3 years
11	Contractors Drug & Alcohol Program EN #11	As needed
12	Upgrading / MAOP Inspection EN #59	As needed
13	Small Gas Operator/Master Meter Operator EN#37	1 Year
B. Field Inspections		
1	Leak Survey (for gas company) EN #44	1 year
2	Corrosion Survey (for gas company) EN #41 (Test Interval, Test Points check)	1 year
3	Regulator Station Inspection (for gas company) EN #43	1 year
4	Pipeline Construction/Repairing Inspection (steel/plastic, CI, and Bare Steel Replacement) EN #33. Plastic Construction Inspection EN #34 (Met construction and minimum test pressure standards?)	1 year

5	Key Valves Inspection/Emergency Valves Inspection EN #46	Yearly
6	Failure Investigation/Incident Investigation (Federal Protocols) EN #54	As needed
7	Leak Repair Inspection EN #42 (Per NTSB Requirement, check for multiple leaks and confirm limit of gas migration to other buildings).	As needed
8	Plastic Joining Inspection – Testing EN #60 Field	Annually
9	Welding Procedure Inspection EN #31	2 years
10	Operator Qualification Field Inspection (OQ 9) EN #32.9 (List covered tasks)	Annually
11	IMP Field Inspection EN #62 (Communication with operator re: new work)	As needed
12	Incident Investigation EN #54 A	As needed
13	Damage Prevention Inspection EN #39	As needed
14	Anode Installation Inspection EN #56	As needed
15	Leak Repair EN #42	As needed
16	Customer Response Leak Survey EN #36	As needed
17	Refereed Meter Test EN #58	As needed

*** See Appendix A for Inspections Priority List ***

Inspection Procedures

Directions to Inspector - Pre-Inspection Planning/Activities:

- 1) Directions for acquiring the appropriate documents, forms, equipment, and personal protective equipment needed for the type of inspection being conducted:
 - a. Access the operator's Daily Location Sheet on SharePoint and the daily work schedule via email
 - b. Select location(s) to visit
 - c. Verify the scope of the Miss Utility locate ticket along with the Work Request.
- 2) Directions for reviewing the operator's available information in state files and state/federal databases to become familiar with the operator's system and inspection issues:
 - a. Access the OCE "C" drive to retrieve previous inspection records
 - b. Access and review appropriate procedure based on type of inspection.
- 3) Directions for conducting a review of previous inspection reports including violations cited to identify past inspection issues; the review may require additional follow-up actions; and:
 - a. Review previous inspection reports for possible enforcement follow-up
 - b. If previous report contains a non-compliance, check the status of the enforcement action (NOPV, Warning Letter, Corrective Action Plan, etc.), and plan a follow-up
 - c. If previous report does not contain enforcement action, review inspector's note.

4) Directions for providing operator notification of the inspection, coordinating expectations with the operator, and scheduling the inspection visit:

- a. For unscheduled inspections no notification is required
- b. Channel ALL inspection notification and coordination through the operator/Company's DOT Compliance Department either via email or by phone.

Directions to Inspector to Complete Other Pre-Inspection Activities and Prepare for ALL LISTED INSPECTIONS

The Inspector will:

- Use email or telephone call to confirm the name and mailing address of the jurisdictional operator
- Use email or telephone call to confirm the official address of the operator to which all pipeline safety related correspondence is sent and considered the official notice to the operator
- Check the Commission's internal data base and docket to verify the information about the pipeline location and service area
- Follow the risk-based procedure used to establish an inspection priority list (e.g., PHMSA –PL1RA Introduction to Risk Assessment Methods, Appendix S).
- Check the operator's Operations and Maintenance Manual to become familiar with the operator or utility's plans, procedures, and processes associated with the area to be inspected
- From the OCE's automated inspection tablet and PPE inventory, obtain the appropriate documents, forms, equipment, and personal protective equipment needed for the type of inspection to be conducted
- Ensure appropriate Inspection Forms cite or display Title 49 CFR and applicable Part and Section
- Use the Commission docket and federal databases to review the operator's available information to become familiar with the operator's system and inspection issues
- Identify any special permits/waivers and any recommendations that apply to the system/segment being inspected

The Inspector's inspection plan will address the inspection priorities of each operator/unit based on the following elements:

- Length of time since last inspection – must complete an inspection of each operator's inspection units within the appropriate interval for: i) Standard Inspection (General Code Compliance), ii) DIMP Inspection, iii) IMP Inspection, iv) Operator Qualification (OQ) Inspection (See Table for Types of Inspections and Frequency/Interval).
- Operating history of operator/unit and/or location (includes leakage, accident/incident history and compliance activities)
- Type of activity being undertaken by operators and recent events (e.g., construction, changes in operator personnel or operating procedures)
- Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Density, etc.) – NE, SE, NW, SW
- Rotation of locations inspected
- 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). See also Inspection Priority List.

- Deadlines for completion of Public Awareness Program Effectiveness Inspections.
- Appropriate breakdown of inspection units (one operator, one inspection unit for DC).

Directions to Inspector – All Listed Inspections/Activities:

Those activities required for conducting a thorough and comprehensive inspection. Inspection activities should include:

- 1) Directions for conducting an entry/opening interview with the operator's representative(s) present at the inspection visit:
 - a. Once on site, introduce yourself and ask for the person in charge
 - b. Ask the scope of the work being done and the number of crew members on site.
- 2) Directions for reviewing operator procedures, records, and pipeline facilities in the field:
 - a. Review/check paperwork (Work Request, BCA, locate ticket, permits)
 - b. Conduct a visual inspection of facilities on site
 - c. Request procedures based on covered tasks being performed
 - d. Verify/check OQ cards (electronic and/or hard copy) of crew members.
- 3) Directions for completing inspection documentation:
 - a. Verify locate marks
 - b. Conduct the inspection
 - c. On the OCE automated inspection tablet, select and fill out the appropriate inspection form (EN) based on inspection type.
- 4) Directions for conducting an exit interview with the operator's representatives.
 - a. Upon completion of the observed covered task, conduct an exit interview with the competent persons on site (Company's crew and/or its contractors' crews foreman and supervisor)
 - b. Inform them of any non-compliance observed along with any enforcement action that the Commission may take.
 - c. Document findings on the inspection form and notify the Chief, OCE/Program Manager by sending the completed inspection form via email in case of non-compliance; otherwise synchronize your tablet when the form is complete.
- 5) Instructions for documenting the potential enforcement issues found during the inspection and discussion with the operator's representatives on the findings:
 - a. Document potential issues by way of video and/or pictures of any physical evidence, and documents supporting the possible non-compliance
 - b. Document on the appropriate inspection (EN) form any discussion with the Company's and/or its contractors' representatives on site
 - c. Inform the Company's and/or its contractors' representatives on site about the specific probable violation. As appropriate, follow up with an email alert of impending enforcement action to the Company within 30 days of your inspection.

- d. Request that the Company file the Outside Agency Visit Form with the OCE within 5 days as prescribed in DCMR Chapter 23 Section 2311.1
 - e. Document findings on the inspection form and notify Chief, OCE/Program Manager by sending the inspection form via email in case of non-compliance; otherwise synchronize your tablet when the form is complete. You may not document minor observations you discussed verbally with Company representatives.
- 6) Directions on obtaining access to operator's records, pipeline facilities or requesting from the operator, any clarification on documentation.
- a. To access operator's records, pipeline facilities or any data request; please send your request via email to DOTCpompliance@washgas.com; Washington Gas' Compliance group will coordinate with the appropriate department and submit the requested documents within the deadline set in your email.

Directions to Inspector to Complete SPECIFIC Listed Inspections and Related Activities:

Directions to Inspector for Conducting STANDARD Inspections (for general code compliance)

The Inspector will:

- Visit the operator's site(s) to conduct a comprehensive and thorough review and evaluation of the operator's compliance records, operations and maintenance plans, emergency procedures, public awareness plans, drug and alcohol programs and pipeline facilities, including corrosion control, leakage surveys, overpressure protection and pressure regulating equipment, odorization levels and equipment, repaired and/or active leaks, emergency valves, and emergency responses
- Use the appropriate inspection form in the OCE automated inspection tablet and referenced to the applicable Federal and/or DC regulations for guidance and documentation during the inspections
- Use a telephone call or email to the operator contact person to confirm access to system facilities by time of day, day of the week, and entry restrictions to secure sites and facilities
- Use a telephone call or email to the operator contact person to confirm ability to use utility vehicles and special equipment, e.g., bucket truck to inspect overhead assets
- Upon arrival on site, check with the supervisor to confirm ability to photograph equipment and materials
- Devote a specific number of days for standard inspection activities in municipal and master meter facilities
- Conduct joint inspection with other inspector(s) when warranted. Rotate inspections as appropriate, and rotate with all three jurisdictions/States in which WGL operates
- Conduct an opening interview with the operator's representatives present at the inspection
- Review operator procedures, records, and pipeline facilities in the field, and request clarification on the documentation, if required

- Complete inspection documentation
- Document the potential enforcement issues found during the inspection and discussion with the operator's representatives on the findings
- Close each on-site inspection with an exit critique with a representative of the operator or utility. Discuss all probable violations discovered by the Inspector with the operator.
- **Complete the inspection form and report and submit to the Chief of OCE no later than two (2) weeks after each inspection**
- **File/upload the inspection report to the OCE Shared Drive and to the database filing and retrieval system**
- Notify the Chief of OCE of the **reason for the delay** if circumstances are encountered requiring additional time to finalize the report.

Directions to Inspector for Conducting DISTRIBUTION INTEGRITY MANAGEMENT PROGRAM (DIMP) Inspections

The Inspector will:

- Use DIMP Inspection Forms EN #s 22, 23, 24 and 70 to conduct a comprehensive and thorough review and evaluation of the operator's Distribution Integrity Management Plan to ensure that the Plan contains procedures for developing and implementing the elements outlined in 49 CFR §§ 192.1007 – 1015
- Use a telephone call or email to the operator contact person to confirm access to system facilities by time of day, day of the week, and entry restrictions to secure sites and facilities
- Notify the company and make arrangements by telephone or electronic mail with company and/or contractor personnel to cooperate in conducting the inspection
- Use a telephone call or email to the operator contact person to confirm ability to use utility vehicles and special equipment, e.g., bucket truck to inspect overhead assets
- Upon arrival on site, confirm ability to photograph equipment and materials
- Conduct joint inspection with other inspector(s) when warranted and rotate inspections as appropriate
- Conduct an opening interview with the operator's representatives present at the inspection
- Review operator procedures, records, and pipeline facilities in the field, and request clarification on the documentation, if required
- Complete inspection documentation
- Document the potential enforcement issues found during the inspection and discussion with the operator's representatives on the findings
- Close each on-site inspection with an exit critique with a representative of the operator or utility
- **Complete the inspection form and report and submit to the Chief of OCE no later than two (2) weeks after each inspection**
- **File/upload the inspection report to the OCE Shared Drive and to the database filing and retrieval system**
- **Report/upload the DIMP inspection results and inspection protocol forms into the appropriate federal integrity management database. (Note: Follow similar steps and use the appropriate IMP inspections forms and checklists for IMP inspections).**

- Notify the Chief of OCE of the **reason for the delay** if circumstances are encountered requiring additional time to finalize the report.

Directions to Inspector for Conducting TRANSMISSION INTEGRITY MANAGEMENT PROGRAM (IMP) Inspections

The Inspector will:

- Use the IMP Inspection Form EN# 62 to conduct a comprehensive and thorough review and evaluation of the operator's Integrity Management Plan to ensure that the Plan contains procedures for developing and implementing the elements outlined in Federal protocols (and that the line meets all code requirements under "Transmission")
- Review operator procedures, records, and pipeline facilities in the field, and request clarification on the documentation, if required (verify that any transmission pressure reduction was not due to a safety condition, and that the line meets all code requirements under "Distribution" in addition to < 20% of SMYS)
- Use a telephone call or email to the operator contact person to confirm access to system facilities by time of day, day of the week, and entry restrictions to secure sites and facilities
- Notify the company and make arrangements by telephone or electronic mail with company and/or contractor personnel to cooperate in conducting the inspection
- Use a telephone call or email to the operator contact person to confirm ability to use utility vehicles and special equipment, e.g., bucket truck to inspect overhead assets
- Upon arrival on site, confirm ability to photograph equipment and materials
- Conduct joint inspection with other inspector(s) when warranted and rotate inspections as appropriate
- Conduct an opening interview with the operator's representatives present at the inspection
- Review operator procedures, records, and pipeline facilities in the field, and request clarification on the documentation, if required
- Complete inspection documentation
- Document the potential enforcement issues found during the inspection and discussion with the operator's representatives on the findings
- Close each on-site inspection with an exit critique with a representative of the operator or utility
- **Complete the inspection form and report and submit to the Chief of OCE no later than two (2) weeks after each inspection**
- **File/upload the inspection report to the OCE Shared Drive and to the database filing and retrieval system**
- **Report/upload the IMP inspection results and inspection protocol forms into the appropriate federal integrity management database. (Note: Follow similar steps and use the appropriate DIMP inspections forms and checklists for DIMP inspections).**
- Notify the Chief of OCE of the **reason for the delay** if circumstances are encountered requiring additional time to finalize the report.

Directions to Inspector for Conducting OPERATOR QUALIFICATION (OQ) Inspections

The Inspector will:

- Use the 9 Element Inspection Protocol Form and the Operator Form 15 OQ Field Inspection Protocol to document the individuals and list the covered tasks observed during field inspections
- Conduct an opening interview with the operator's representatives present at the inspection
- Note the status of qualification for each task observed
- Determine if the operator's training requirements are being met and appropriate documentation is being maintained by the operator
- **NOTE: On-Site Operator Training - Any operator training conducted should be outlined and appropriately documented as needed**
- Complete inspection documentation
- Document the potential enforcement issues found during the inspection and discussion with the operator's representatives on the findings
- Close the inspection with an exit critique with a representative of the operator or utility
- **Complete the inspection form and report and submit to the Chief of OCE no later than two (2) weeks after each inspection**
- **File/upload the inspection report to the OCE Shared Drive and to the database filing and retrieval system**
- **Report/upload the OQ inspection results (including Protocol 9 Element only) into the appropriate federal database**
- Notify the Chief of OCE of the **reason for the delay** if circumstances are encountered requiring additional time to finalize the report.

Directions to Inspector for Conducting DAMAGE PREVENTION Inspections (49 CFR § 192.605, § 192.614)

The Inspector will:

- Use the appropriate inspection form in the OCE automated inspection tablet and referenced to the applicable Federal and/or DC regulations for guidance and documentation during the inspection
- Verify that the operator participates in a qualified One Call program, or if available, a company program that complies with the following:
 - i) Identify persons who engage in excavation (including list of bad excavators)
 - ii) Provide notification to the public in the One Call area
 - iii) Provide means for receiving and recording notifications of pending excavations, e.g., through monitoring Miss Utility ticket requests
 - iv) Provide notification of pending excavations to members of One Call

- v) Provide means of temporary marking to the pipeline in the vicinity of the excavations
 - vi) Provide for inspection of the pipeline where there is reason to believe the pipeline could be damaged (This includes as many inspections as necessary during and after excavations and conduct of a leak survey after blasting).
- Review the damages the company sustained due to third party damages per 1,000 locates during the previous year
 - Compare the current hits/1,000 locates to prior years to determine if the rate is decreasing
 - **Complete the inspection form and report and submit to the Chief of OCE no later than two (2) weeks after each inspection**
 - **File/upload the inspection report to the OCE Shared Drive and to the database filing and retrieval system**
- Notify the Chief of OCE of the **reason for the delay** if circumstances are encountered requiring additional time to finalize the report.

Directions to Inspector for Conducting CONSTRUCTION Inspections (including Design and Testing)

The Inspector will:

- Use a telephone call or email to the operator contact person to schedule field observation of the installation of new gas piping (transmission, distribution main or service) resulting in an increase in capacity or size of an existing facility as accomplished through replacement
- **In January of each year** use email to contact all regulated entities and request a listing of, and approximate start date for planned construction projects
- Include construction inspections when scheduling field inspection activities based on the projected dates of the projects
- Use a telephone call or email to contact the operator representative in a reasonable time period before the inspection
- Go to the OCE internal data base or Commission docket to review the operator's (O & M) procedures in advance of the inspection or request a copy of the procedures from company representatives to be reviewed while observing the construction procedure
- Use the appropriate inspection form in OCE's automated inspection tablet and referenced to the applicable Federal and/or DC regulations for guidance and documentation during the inspection
- Use the checklist or form to document adherence to the proper construction procedure
- Notify the appropriate company official if a task is not being completed as required
- Conduct a review to determine whether the issue identified relates to the procedure or a training/qualification problem in natural gas transmission and distribution
- Notify the Chief of OCE if the code or rule sections referenced in the checklist or inspection form are incorrect or in need of updating
- Ensure that the most current copy of the inspection checklist or form is maintained in the OCE automated inspection tablet/system and Shared Drive

- As part of the inspection, determine if the company is following its damage prevention program by verifying that a ticket has been issued and the excavation or digging completed within the time interval allowed on the ticket
- Determine if the operator/company-approved excavation procedures are being adhered to
- Review crew members' qualifications (OQ Cards) and document same for currency
- Determine if tasks were conducted satisfactorily and document findings on the appropriate construction checklist or inspection form
- **Complete the necessary documentation and attachments (e.g., forms, reports, drawings, pictures), complete and review the entire report package and submit the finalized inspection report and attachments to the Chief of OCE within two (2) weeks of the completion date of the inspection**
- **File/upload the inspection report to the OCE Shared Drive and to the database filing and retrieval system**
- Notify the Chief of OCE of the **reason for the delay** if circumstances are encountered requiring additional time to finalize the report.

Directions to Inspector for Conducting Post Inspection Activities:

Those activities required after an inspection is completed. Post Inspection Activities should include:

- 1) Verification that all required data points are uploaded or entered in the proper state and federal data bases within a reasonable time:
 - a. Ensure every applicable data field on the inspection form is filled
 - b. For Forms subject to federal submission, ensure the form is submitted to the appropriate federal data bases.
- 2) Instructions for gathering and updating new information concerning the operator:

Detailed instructions for completing and filing all necessary paperwork resulting from the inspection, including time limits for processing probable compliance/enforcement action:

- a. For each inspection, fill up the correct EN form and synchronize the inspection tablet upon completion of the form if no follow-up inspection is required. If a follow-up inspection is required, keep the EN form in edit mode and synchronize the tablet when the follow-up inspection is complete.
- b. For inspections with a probable violation, ensure the EN form is sent to the Chief, OCE/Program Manager and the Senior Compliance Officer who will ensure that the Operator is notified of the probable violation within 30 days from the date of the inspection, and a Notice of Probable Violation (NOPV) or warning letter issued to the Operator within 90 days from the date of the discovery of the probable violation.

Detailed instructions for the retention of inspection records and documents including date of destruction if required.

- a. Inspection records will be kept for 5 Years

- b. The destruction of any record will be coordinated and handled through the Office of the Commission Secretary.

Are the state's largest operator's programs being contacted or reviewed annually for IMP/DIMP, infrastructure, etc.

OCE will request Washington Gas' responsible IMP/DIMP groups to provide information related to any IMP/DIMP work/activity that may have been conducted by the Company during the year outside of the set cycle.

Directions to Inspector for Documenting Inspection Concerns/Action Items

- a. For each inspection, documented issues/concerns and recommendations will become an appendix to the appropriate inspection form based on the type of inspection. This appendix will be joined to the completed inspection and will service to track the status of any compliance issue discovered/discussed with the Operator.
- b. If a follow-up inspection is required, keep the EN form in edit mode and synchronize the tablet when the follow-up inspection is complete.

Directions to Inspector on INCIDENT/ACCIDENT INVESTIGATION PROCEDURES

Does the state have written procedures to address state action in the event of an incident/accident?

- 1. Review the states procedure manual, inspection forms and records.
- 2. Verify the program inspection procedures contain procedures for incident/accident investigations.
- 3. Verify that the procedures contain specific instructions establishing when on site incident/accident investigations will be conducted:

An on-site investigation will be conducted whenever possible after a notification is received. The site investigation will be documented on EN# 54, and any discovered non-compliance will be handled per procedures outlined in the section: NOTICE OF PROBABLE VIOLATION (NOPV) (15 DCMR §2311) of this manual.

- 4. Verify that the procedures contain a process for collecting information when an onsite investigation is NOT conducted:

For after-hours incident notifications by Washington Gas, the On-Call inspector will document preliminary/initial information provided by the caller. The provided information will be collected and documented on the incident notification form EN# 54 (refer to form for details). The collected information will be used to determine if an on-site investigation is necessary.

- 5. Procedures should require a memo to file to be completed to describe why an on-site investigation was not done:

The incident notification form EN# 54 will be filed as part of the record supporting why an onsite investigation did not take place.

- 6. Verify that inspections procedures indicate what inspection forms are used.

Select the appropriate Inspection form based on type of inspection to be conducted.

Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports:

Upon getting notified by Washington Gas, the On-Call inspector will document preliminary/initial information provided by the caller. The provided information will be collected and documented on the incident notification form EN# 54 (refer to short form for details). The collected information will be used to determine if an onsite investigation is necessary.

If onsite investigation was not made, did the state obtain sufficient information to determine the facts to support the decision to not go on-site

The provided information will be collected and documented on the incident notification form EN# 54 (refer to short form for details). The collected information will be used to determine if an on-site investigation is necessary.

Documentation

The results of an inspection will be noted on the check-list/Inspection Forms or otherwise summarized. The record will include the date, name of operator and representative(s), activities and facilities inspected, and conclusions.

Upon completion of the inspection, the operator will be advised of the inspector's determinations through an exit interview. Probable violations of regulations will be addressed in a written enforcement action.

Follow up

On behalf of the Commission, OCE is responsible for ensuring that an operator corrects all non-compliance of the pipeline safety standards discovered during an inspection. The timelines for corrective actions will depend upon the seriousness of the deficiency or violation and the circumstances involved. In those cases where non-compliance is considered a serious hazard to the public, thorough follow-up inspection will be conducted to verify the adequacy of the corrective action. A record of all non-compliances will be maintained (in the OCE Shared Drive and in the database filing and retrieval system) and reviewed to ensure that proper and timely corrective actions have been accomplished on each of the non-compliances discovered.

ENFORCEMENT PROCEDURE

Inspections

The Office of Compliance and Enforcement will conduct periodic inspections of records and property in the possession, custody, or control of a gas operator to determine compliance with

the latest revision of the Federal Natural Gas Pipeline Safety Act or Title 15, Chapter 23 of the District of Columbia Municipal Regulations (DC Regulations).

Amendment of Plans or Procedures (Title 49 CFR §190.237)

- (a) When the Office of Compliance and Enforcement determines that an operator's plans or procedures required under 49 CFR Parts 192 and 199, or DC Regulations, are inadequate to assure safe operation of a pipeline facility, the DC PSC shall require that the plans or procedures be revised by issuing a Notice of Amendment. The Notice shall provide an opportunity for a hearing under 49 CFR §190.211 and shall specify the alleged inadequacies and the proposed action for revision of the plans or procedures. The Notice shall allow the operator 30 days after receipt of the Notice to submit written comments or request a hearing. The request for a hearing usually follows a Determination Letter to the operator. After considering all material presented in writing or at the hearing, the Commissioners or Hearing Officers shall determine whether the plans or procedures are inadequate as alleged and order the required amendment, if they are inadequate, or withdraw the notice if they are adequate. In determining the adequacy of an operator's plans or procedures, the Office of Compliance and Enforcement shall consider:
 - (1) Relevant available pipeline safety data;
 - (2) Whether the plans or procedures are appropriate for the particular type of pipeline transportation or facility, and for the location of the facility;
 - (3) The reasonableness of the plans or procedures; and,
 - (4) The extent to which the plans or procedures contribute to public safety.
- (b) The amendment of an operator's plans or procedures prescribed in paragraph (a) of this section is in addition to, and may be used in conjunction with, the appropriate enforcement actions prescribed.
- (c) For all inspections relating to Operator Qualification, Public Awareness Programs, Distribution Integrity Management Plans, and Integrity Management of Transmission facilities, DC PSC will utilize protocol forms from PHMSA's website.

Specific Information Request (Title 49 CFR § 190.203)

After a complaint, report, or inspection, the Office of Compliance and Enforcement may send a gas operator (company officer) a Specific Information Request ("SIR"). The gas operator (company officer) shall respond within 5 working days after receipt of a SIR when it relates to a possible reportable incident. All other SIRs not relating to reportable incidents shall be responded to within 45 days after receipt. The Commission may waive the above requirements upon written request from a gas operator demonstrating sufficient cause.

Reportable Incident Investigation (15 DCMR §2306)

Pursuant to Federal/State regulations a State agency shall conduct an investigation of each significant or reportable incident/accident involving jurisdictional pipeline facilities. The primary objective of the investigation activities is to document findings, identify contributing factors and root cause, and recommend corrective actions to minimize the possibility of recurrence for the affected operator and other operators in the State's jurisdiction and to institute enforcement action where noncompliance with the safety standards has occurred. After a reportable incident, as defined in the District of Columbia Municipal Regulations 15 DCMR §2306, the Office of Compliance and Enforcement may interview personnel, view equipment and/or pipe, issue a subpoena for equipment and/or pipe relating to the incident for independent preservation, order independent laboratory tests of equipment and/or pipe, view related documents, and take other investigative measures as needed to complete a comprehensive independent investigation.

A gas operator shall preserve all equipment and/or piping, which may have contributed to the incident until such time as investigation by the Office of Compliance and Enforcement has been completed.

Reportable Incident Testing

After a reportable incident, a gas operator shall conduct the following minimum tests. The perimeter of the area involved in the incident shall be leak surveyed using a subsurface gas detection survey. All piping directly associated with the incident, or which may have contributed to the incident, shall be pressure tested, unless evidence clearly indicates the cause and origin of the incident. A gas regulator or meter serving a structure involved in the incident shall be properly tagged and stored in a secured area for testing at the earliest practical time. When appropriate, a sample of the failed facility or equipment shall be selected for laboratory examination.

The test results as required shall be sent to the Office of Compliance and Enforcement within 10 days of the test.

Reportable Incident Investigation (49 CFR §191.3)

The Office of Compliance and Enforcement shall follow the same procedure as mentioned above in case of Reportable Incident Investigation (15 DCMR §2306). In addition, the Office of Compliance and Enforcement shall make sure that the Reportable Incidents are reported to the National Response Center ("NRC") by the Intrastate Operator in a timely manner per Federal Regulations. The Office of Compliance and Enforcement shall provide "heads-up" information to US DOT/PHMSA-Accident Investigation Division as soon as possible. Based on the initial information received by the DC PSC, the Office of Compliance and Enforcement may determine not to conduct on site-site investigation. The Office will keep records to support the decisions made. The Office will conduct on-site investigations of all federal reportable incidents (i.e., resulting in death, injury requiring hospitalization, or property damage exceeding \$50,000).

An on-site investigation will be conducted whenever possible after a notification is received. The site investigation will be documented on EN# 54, and any discovered non-compliance will be

handled per procedures outlined in the section: NOTICE OF PROBABLE VIOLATION (NOPV) (15 DCMR §2311) of this manual.

For afterhours incident notifications by Washington Gas, the On-Call inspector will document preliminary/initial information provided by the caller. The provided information will be collected and documented on the incident notification form EN# 54 (refer to form for details). The collected information will be used to determine if an onsite investigation is necessary. The incident notification form EN# 54 will be filed as part of the record supporting why an onsite investigation did not take place.

Safety Related Conditions (“SRC”) Follow-Up and Update

The Office of Compliance and Enforcement will receive a request for SRC update. The Office will provide follow-up and updates per Part 6.2 Chapter 6 of PHMSA Guideline Manual within 30 days by e-mail to PHMSA-Eastern Region, and maintain communications. Once DC PSC makes a determination that all necessary remedial actions have been completed and no further actions are needed, the Office of Compliance and Enforcement will recommend to Eastern Region that the SRC be closed.

NOTICE OF PROBABLE VIOLATION (NOPV) (15 DCMR §2311)

VIOLATION REPORT

Within two (2) weeks following an inspection or investigation from which a probable violation has been determined, the inspector or investigator shall first prepare a written Violation or Inspection Report for the Chief of OCE and recommend enforcement action including a Notice of Probable Violation (NOPV). If a violation is corrected on the spot, no further action may be required. The Violation Report shall include:

- 1) Date of the violation
- 2) Time of the violation
- 3) Location of the violation
- 4) Description of the specific provision or Code violated (probable violation)
- 5) Description of the specific action or behavior that violated the provision or Code; e.g.: on a specific date, at a specific time, at a specific location the inspector observed the operator welding a pipe joint. The inspector asked the operator to show a copy of the applicable welding procedure and the operator failed to show the applicable welding procedure as required by the applicable Sections of 49 CFR/DCMR. (This includes a listing/citing of the applicable codes violated).

- 6) Witnesses or other personnel present at the time and place of the probable violation.
- 7) Any physical or graphic evidence gathered by the inspector/investigator, e.g., a photograph scanned and put on record.
- 8) Any communication exchange between the inspector/investigator and the operator at the site of the observed probable violation.
- 9) Record or copy of previous information request(s) and warning letter(s).
- 10) Include documented confirmation of site visit by DCPSC, example Form APP2100-1, Outside Agency Visit or other form completed by WGL supervisors during PSC's visit.

When an evaluation of an operator's records or facilities indicates that the operator apparently is not in compliance with a pipeline safety regulation, the investigator shall, within 90 days of inspection, prepare the letter for the Chief, OCE/Program Manager to sign and send to inform the Operator (Company Officer) of the probable violation.

The Chief, OCE/Program Manager, will issue a Compliance Action which may include a NOPV or other compliance actions, to the Operator upon finding good causes to believe a violation of the Federal Natural Gas Pipeline Safety Act; U.S.C. App. 91671 et Seq, or the D.C. Code, has occurred.

A NOPV shall include:

- 1) A statement of the regulation, or rule allegedly violated by a gas corporation or small gas operator;
- 2) A description of the supporting evidence indicating a possible violation;
- 3) A notice of response options available to the gas corporation or small gas operator;
- 4) If appropriate, the amount of the proposed civil penalty and the maximum civil penalty applicable under the law; and,
- 5) If appropriate, a statement of the remedial action and specific timeline being sought in a compliance order.

The NOPV may include a proposed compliance order. If the operator objects to the compliance order in writing, the Chief, OCE will review the objection and issue a determination within 60 calendar days.

A NOPV process will involve: Inspection > Inspection Form > Draft Inspection/Violation Report > Chief of OCE/Program Manager and Legal (OGC) Review > NOPV Approved for Issue >

NOPV Issued to Company Officer who may or may not request a meeting with the Chief of OCE/Program Manager.

Opportunity for Operator to Respond, NOPV Tracking and Closure

A gas corporation that is the subject of a formal notice of probable violation shall respond to the Chief, Office of Compliance and Enforcement, in writing, within 30 days of receipt of the notice.

A natural gas corporation may respond to a formal notice of probable violation by taking one of the following actions:

- (a) Pay the civil penalty assessed and/or
- (b) Submit a written plan of action to the Office of Compliance and Enforcement outlining actions that will be taken to correct the violations, including a schedule and the date when compliance is anticipated and/or
- (c) Request an information conference with the Chief, Office of Compliance and Enforcement/Program Manager.

If a conference is requested, it shall be held within fourteen (14) days of the request. The conference shall be convened by the Chief, Office of Compliance and Enforcement, and shall be attended by the investigator who filed the report.

If the matter is not resolved at an informal conference or if the Chief, Office of Compliance and Enforcement, rejects the plan of action submitted by the Natural Gas Corporation, the Chief, Office of Compliance and Enforcement, shall issue a Determination Letter within sixty (60) days of the conference or send the rejection of the corporation's plan to the Commission for resolution.

- (d) Contest the allegation(s) in the NOPV.

The Chief, Office of Compliance and Enforcement will issue her/his decision on the operator's contest of the allegation(s) in the NOPV through a Determination Letter within sixty (60) days. The operator may request a formal hearing within 30 days of its receipt of the Determination Letter. The operator may request the execution of a consent order jointly with OCE. Upon the Commissioners' approval, the Chief, OCE may execute a consent order ("Settlement Agreement") with the operator on the probable violations.

- (e) Accomplish Closure of the NOPV by: (i) the Operator's response to the NOPV letter includes documentation of correction of the deficiency, (ii) a follow up inspection has been conducted to verify correction of the deficiency, and/or (iii) a regularly scheduled inspection of the operator has verified that the violation issue no longer exists.

CIVIL PENALTIES (49 CFR § 190.223 (a))

The amount of any civil penalty shall be determined by the Office of Compliance and Enforcement and the Office of the General Counsel (OGC) or agreed upon in compromise, based upon the appropriateness of the penalty to the size of the business of the operator charged, the gravity of the violation, the good faith of the operator charged in attempting to achieve compliance after notification of violation, history of repeat violations, the economic benefit, and other matters that justice requires. Penalty reduced on contingency in a settlement or in a compromise and mitigation may be re-instated to the original amount if the operator fails to implement the directed corrective action in the settlement/compromise and mitigation. In proposing a civil penalty, the OCE and OGC shall consider the most current inflation-adjusted maximum penalty amount stated in 49 CFR § 190.223 (a) and the procedure in 49 CFR § 190.209 for violations of Commission pipeline safety rules.

Corrective Action Order (15 DCMR §2302)

If a particular pipeline facility is found to be hazardous to life or property as outlined in 15 DCMR §2302, the Office of Compliance and Enforcement shall issue a hazardous facility order. A hazardous facility order shall provide an opportunity for a Commission Hearing. A hazardous facility order shall contain a finding that a pipeline facility is hazardous to life or property, the facts on which the finding is based, the legal basis of the order, the nature and description of the particular corrective action required of the gas operator and the date by which this action is to be taken. Corrective action may include suspended or restricted use of the facility, physical inspection, testing, repair, replacement, or other action. The Commission shall issue a corrective action order in lieu of a civil penalty if a past civil penalty did not provide sufficient deterrence from the violation.

Record Keeping

The Office of Compliance and Enforcement maintains all inspection records for a minimum period of five (5) years. In specific unique situations, the Office will maintain the necessary records for a longer period. The pipeline inspection report and all other pipeline safety correspondence are filed. The Office of Compliance and Enforcement maintains these files in its Shared Drive and in the database filing and retrieval system.

ATTACHMENTS

1. List of Gas Companies and Master Meter Operators in the District of Columbia.
2. Civil Penalty Assessments in NOPVs

ATTACHMENT 1

PRIVATE GAS DISTRIBUTION AND TRANSMISSION OPERATOR IN THE DISTRICT OF COLUMBIA

Washington Gas
6801 Industrial Road,
Springfield, Virginia 22151
Inspection Units 1 (both for transmission and distribution lines)

MASTER METER OPERATORS IN THE DISTRICT OF COLUMBIA

Still under investigation.

ATTACHMENT 2

MAXIMUM AMOUNTS TO BE CHARGED FOR VIOLATIONS OF COMMISSION'S RULES ON PIPELINE SAFETY

Please refer to the most current inflation-adjusted maximum penalty amount stated in 49 CFR § 190.223 (a) to assess the civil penalties for violations of the Commission's pipeline safety rules.

ADJUSTMENT CRITERIA FOR CIVIL PENALTIES

The Commission shall consider the following factors in determining civil penalty amounts:

Factor	Effect
Appropriateness of the penalty to the size of the business of the person charged	100% Increase or 50% Decrease
Gravity of the violation (including environmental considerations)	200% Increase
Good faith of the person charged in attempting to achieve compliance	25% Decrease

The Commission may consider the following downward adjustment criteria in determining the amount of any civil penalty:

Downward Adjustment Criteria	Effect
Minor Violation	50% Decrease
Voluntary Disclosure (i.e., operator is not required to report)	50% Decrease
History of Overall Compliance	50% Decrease
Inability to Pay	25% Decrease

The Commission may consider the following upward adjustment criteria in determining the amount of any civil penalty:

Upward Adjustment Criteria	Effect
Misrepresentation or Lack of Candor	100% Increase
Ability to Pay/Relative Disincentive	100% Increase
Intentional Violation	300% Increase
Substantial Threat to Public Safety	500% Increase
Prior Violation of Commission Requirements	100% Increase
Economic Benefit	100% Increase
Repeated or Continuous Violation	200% Increase
Inadequate Supervision	300% Increase

Appendix A Inspections Priority List and Types of Inspections

The Chart below displays the order in which the District of Columbia Public Service Commission Pipeline Safety Engineers/Inspectors prioritize pipeline safety inspections.

	TYPES OF INSPECTIONS	MINIMUM FREQUENCY/SCHEDULE
A. Office Inspections		
1	Comprehensive Evaluation (for gas company) EN #17	3 Years
2	Comprehensive Drug and Alcohol Testing Program (Federal Protocols) EN #35	3 Years
3	Operator Qualification Plan/Records Inspection (Federal Protocols) EN #32	3 Years
4	Transmission and Distribution Integrity Management Inspections (IMP & DIMP) (Federal Protocols) EN #62 and #70	3 Years
5	Control Room Management Inspection (Federal Protocols) EN #71	3 Years
6	Public Awareness Program Inspection (RP1162) (Federal Protocols) EN #66	36 months
7	Records Inspection (corrosion, odorant (Odorization equipment checked to ensure no wide variations in level of odorant introduced), leak survey, valve maintenance, regulator station maintenance, testing,	1 Year

	and Emergency Plans) EN #16	
8	Drug and Alcohol Records Inspections (or Federal Protocols 36 months) EN #10	1 Year
9	Damage Prevention (General Inspection) EN #55 OPM	As needed
10	Follow-Up Inspections (for non-compliance of operators)	As needed
B. Field Inspections		
11	Key Valves Inspection/Emergency Valves Inspection EN #46	2 Years
12	Welding Procedure Inspection EN #31	2 Years
13	Plastic Joining Inspection – Testing EN #60 - Field	Yearly
14	Operator Qualification Field Inspection (OQ 9) EN #32.9 (List covered tasks)	Yearly
15	Leak Survey (for gas company) EN #44	Yearly
16	Corrosion Survey (for gas company) EN #41 (Test Interval, Test Points check)	Yearly
17	Regulator Station Inspection (for gas company) EN #43	Yearly
18	Pipeline Construction/Repairing Inspection (steel/plastic, CI, and Bare Steel Replacement) EN #33. Plastic Construction Inspection EN #34 (Met construction and minimum test pressure standards?)	As needed
19	Failure Investigation/Incident Investigation (Federal Protocols) EN #54	As needed
20	Leak Repair Inspection EN #42 (Per NTSB Requirement, check for multiple leaks and confirm limit of gas migration to other buildings).	As needed
21	IMP Field Inspection EN #62 (Communication with operator re: new work)	As needed
22	Incident Investigation EN #54 A	As needed
23	Damage Prevention Inspection EN #39	As needed
24	Anode Installation Inspection EN #56	As needed

Appendix B Classification of Inspections by Type – Standard, Construction, and Integrity Management Inspections

NATURAL GAS PIPELINE SAFETY INSPECTION AND ENFORCEMENT PROCEDURES
NATURAL GAS PIPELINE SAFETY INSPECTION AND ENFORCEMENT PROCEDURES

	TYPES OF INSPECTIONS	MINIMUM FREQUENCY/ SCHEDULE
STANDARD INSPECTIONS		
- Office Inspections		
	Comprehensive evaluation (for gas company) EN Form #17	3 Years
	Records inspection (corrosion, odorant, leak survey, valve maintenance, regulator station maintenance, testing, and Emergency Plans) EN Form #16	3 Years
	Comprehensive drug and alcohol testing program (Federal Protocols) EN Form #35	3 Years
	Drug and alcohol records inspections (or Federal Protocols 36 months) EN Form #10	1 Year
	Follow-Up inspections (for non-compliance of operators)	As needed
	Operator Qualification Plan/ Records Inspection (Federal Protocols) EN Form #32	3 Years
	Public Awareness Program (RPI 1162) (Federal Protocols) EN Form #69	2 Years
	Damage Prevention EN Form #39	As needed

	Leak survey (for gas company) EN Form #44	Yearly
	Corrosion survey (for gas company) EN Form #41	Yearly
	Regulator Station inspection (for gas company) EN Form #43	Yearly
	Key valves inspection/Emergency Valves Inspection EN Form #46	Yearly
	Failure investigation/incident investigation EN Form #54	As needed
	Leak Repair EN Form #42	As needed
	Plastic Joining Inspection - Testing EN Form #60	Yearly
	Welding Procedure Inspection EN Form #31	2 Years
	Operator Qualification Field Inspection (OQ9) EN Form #32.9	Yearly
	Incident Investigations - Field	As needed
	Construction Inspections - Throughout the year	As needed
CONSTRUCTION INSPECTIONS (DTC)		
	Pipeline construction/repairing (steel/plastic) (Cl and Bare Steel	As needed

	Replacement) EN Form #33. Plastic construction EN Form #34	
INTEGRITY MANAGEMENT		
	Transmission and Distribution Integrity Management (IMP & DIMP) (Federal Protocols) EN Form #62 and Form #70	3 Years
	IMP Field Inspection EN Form #62	As needed