

National Transportation Safety Board

Washington, DC 20594



Office of the Chairman

June 10, 2019

The Honorable Howard “Skip” Elliott
Administrator
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Mr. Elliott:

On April 24, 2019, the National Transportation Safety Board (NTSB) adopted its report, *Building Explosion and Fire, Silver Spring, Maryland, August 10, 2016*, NTSB/PAR-19/01. The details of this accident investigation and the resulting safety recommendations may be found in the attached report, which can also be accessed at <http://www.nts.gov>.

As a result of this investigation, the NTSB identified the following safety issues:

- The location and inspection of service regulators within a structure.
- The inspection of the gas meter assembly.
- The notification of the natural gas odor to Washington Gas Light Company.
- The detection of natural gas through odorants and methane.

Accordingly, the NTSB makes the following safety recommendations to the Pipeline and Hazardous Materials Safety Administration (PHMSA). Additional information regarding these recommendations can be found in the noted sections of the report.

- Require that all new service regulators be installed outside occupied structures. **(P-19-001) (See section 2.3.10.)**
- Require existing interior service regulators be relocated outside occupied structures whenever the gas service line, meter, or regulator is replaced. In addition, multifamily structures should be prioritized over single-family dwellings. **(P-19-002) (See section 2.3.10.)**

The NTSB is vitally interested in these recommendations because they are designed to prevent accidents and save lives. We would appreciate a response within 90 days, detailing the actions

you have taken or intend to take to implement these recommendations. When replying, please refer to the safety recommendations by number. We encourage you to submit your response to correspondence@ntsb.gov. If your reply exceeds 20 MB, including attachments, please e-mail us at the same address for instructions on how to send larger documents. Please do not submit both an electronic copy and a hard copy of the same response.

National Transportation Safety Board

Washington, DC 20594



Office of the Chairman

June 10, 2019

Mr. Jason M. Stanek
Chairman
Public Service Commission of Maryland
6 St. Paul Street
Suite 1600
Baltimore, MD 21202

Dear Mr. Stanek:

The National Transportation Safety Board (NTSB) is an independent federal agency charged by Congress with investigating every civil aviation accident in the United States and significant accidents in other modes of transportation—railroad, highway, marine, and pipeline. We determine the probable cause of the accidents and issue safety recommendations aimed at preventing future accidents. In addition, we carry out special studies concerning transportation safety and coordinate the resources of the federal government and other organizations to assist victims and their family members affected by major transportation disasters.

We are providing the following information to urge your organization to act on the safety recommendations in this letter because we believe your organization can help reduce the risk of future accidents. For more information about NTSB and our recommendation process, please see the attached one-page summary.

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- The location and inspection of service regulators within a structure.
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- The notification of the natural gas odor to Washington Gas Light Company.
- The detection of natural gas through odorants and methane.

Accordingly, the NTSB makes the following safety recommendations to the Public Service Commission of Maryland, the Commonwealth of Virginia State Corporation Commission Division of Public Utility Regulation, and the Public Service Commission of the District of Columbia. Additional information regarding these recommendations can be found in the noted sections of the report.

- Following Washington Gas's successful completion of Safety Recommendation P-19-009, audit and verify the performance of Washington Gas's mercury service regulator replacement program, including its recordkeeping. **(P-19-003) (See section 2.3.9.)**
- Oversee the replacement process for the mercury service regulators that Washington Gas has in service. **(P-19-004) (See section 2.3.10.)**

The NTSB is vitally interested in these recommendations because they are designed to prevent accidents and save lives. We would appreciate a response within 90 days, detailing the actions you have taken or intend to take to implement these recommendations. When replying, please refer to the safety recommendations by number (for example, P-19-003). We encourage you to submit your response to correspondence@ntsb.gov. If your reply exceeds 20 MB, including attachments, please e-mail us at the same address for instructions on how to send larger documents. Please do not submit both an electronic copy and a hard copy of the same response.

Sincerely,

Robert L. Sumwalt, III
Chairman

National Transportation Safety Board

Washington, DC 20594



Office of the Chairman

June 10, 2019

The Honorable Judith Williams Jagdmann
Chairman
Commonwealth of Virginia
State Corporation Commission
Division of Public Utility Regulation
Tyler Building
1300 E. Main Street
Richmond, VA 23219

Dear Judge Jagdmann:

The National Transportation Safety Board (NTSB) is an independent federal agency charged by Congress with investigating every civil aviation accident in the United States and significant accidents in other modes of transportation—railroad, highway, marine, and pipeline. We determine the probable cause of the accidents and issue safety recommendations aimed at preventing future accidents. In addition, we carry out special studies concerning transportation safety and coordinate the resources of the federal government and other organizations to assist victims and their family members affected by major transportation disasters.

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- Following Washington Gas's successful completion of Safety Recommendation **P-19-009**, audit and verify the performance of Washington Gas's mercury service regulator replacement program, including its recordkeeping. (**P-19-003**) (**See section 2.3.9.**)
- Oversee the replacement process for the mercury service regulators that Washington Gas has in service. (**P-19-004**) (**See section 2.3.10.**)

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Sincerely,

Robert L. Sumwalt, III
Chairman

cc: The Honorable Marc C. Christie, Commissioner
The Honorable Patricia L. West, Commissioner
Mr. William F. Stephens, Director of Division of Public Utility Regulation

National Transportation Safety Board

Washington, DC 20594



Office of the Chairman

June 10, 2019

Mr. Willie L. Phillips
Chairman
Public Service Commission of
the District of Columbia
1325 G Street, NW
Suite 800
Washington, DC 20005

Dear Mr. Phillips:

The National Transportation Safety Board (NTSB) is an independent federal agency charged by Congress with investigating every civil aviation accident in the United States and significant accidents in other modes of transportation—railroad, highway, marine, and pipeline. We determine the probable cause of the accidents and issue safety recommendations aimed at preventing future accidents. In addition, we carry out special studies concerning transportation safety and coordinate the resources of the federal government and other organizations to assist victims and their family members affected by major transportation disasters.

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Sincerely,

Robert L. Sumwalt, III
Chairman

cc: Mr. Richard A. Beverly, Commissioner
Ms. Greer J. Gillis, Commissioner

National Transportation Safety Board

Washington, DC 20594



Office of the Chairman

June 10, 2019

Mr. Gary Galasso
Chairman
Fire Council of Standards
International Academies of Emergency Dispatch
110 South Regent Street
8th Floor
Salt Lake City, UT 84111

Dear Mr. Galasso:

The National Transportation Safety Board (NTSB) is an independent federal agency charged by Congress with investigating every civil aviation accident in the United States and significant accidents in other modes of transportation—railroad, highway, marine, and pipeline. We determine the probable cause of the accidents and issue safety recommendations aimed at preventing future accidents. In addition, we carry out special studies concerning transportation safety and coordinate the resources of the federal government and other organizations to assist victims and their family members affected by major transportation disasters.

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- The detection of natural gas through odorants and methane.

Accordingly, the NTSB makes the following safety recommendation to the International Academies of Emergency Dispatch. Additional information regarding this recommendation can be found in the noted section of the report.

- Revise *Protocol-60 Gas Leak/Gas Odor (Natural and Liquefied Petroleum Gases)* to direct dispatchers to notify the gas company when any odor call is received. **(P-19-005) (See section 2.4.3.)**

The NTSB is vitally interested in this recommendation because it is designed to prevent accidents and save lives. We would appreciate a response within 90 days, detailing the actions you have taken or intend to take to implement this recommendation. When replying, please refer to the safety recommendation by number (for example, P-19-005). We encourage you to submit your response to correspondence@ntsb.gov. If your reply exceeds 20 MB, including attachments, please e-mail us at the same address for instructions on how to send larger documents. Please do not submit both an electronic copy and a hard copy of the same response.

Sincerely,

Robert L. Sumwalt, III
Chairman

National Transportation Safety Board

Washington, DC 20594



Office of the Chairman

June 10, 2019

Mr. Brett Patterson
Chairman
Medical Council of Research
International Academies of Emergency Dispatch
110 South Regent Street
8th Floor
Salt Lake City, UT 84111

Dear Mr. Patterson:

The National Transportation Safety Board (NTSB) is an independent federal agency charged by Congress with investigating every civil aviation accident in the United States and significant accidents in other modes of transportation—railroad, highway, marine, and pipeline. We determine the probable cause of the accidents and issue safety recommendations aimed at preventing future accidents. In addition, we carry out special studies concerning transportation safety and coordinate the resources of the federal government and other organizations to assist victims and their family members affected by major transportation disasters.

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Sincerely,

Robert L. Sumwalt, III
Chairman

National Transportation Safety Board

Washington, DC 20594



Office of the Chairman

June 10, 2019

Mr. Michael Spath
Chairman
ED-Q Council of Standards
International Academies of Emergency Dispatch
110 South Regent Street
8th Floor
Salt Lake City, UT 84111

Dear Mr. Spath:

The National Transportation Safety Board (NTSB) is an independent federal agency charged by Congress with investigating every civil aviation accident in the United States and significant accidents in other modes of transportation—railroad, highway, marine, and pipeline. We determine the probable cause of the accidents and issue safety recommendations aimed at preventing future accidents. In addition, we carry out special studies concerning transportation safety and coordinate the resources of the federal government and other organizations to assist victims and their family members affected by major transportation disasters.

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- Revise *Protocol-60 Gas Leak/Gas Odor (Natural and Liquefied Petroleum Gases)* to direct dispatchers to notify the gas company when any odor call is received. **(P-19-005) (See section 2.4.3.)**

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Sincerely,

Robert L. Sumwalt, III
Chairman

National Transportation Safety Board

Washington, DC 20594



Office of the Chairman

June 10, 2019

Ms. Tami Wiggins
Chair
Police Council of Standards
International Academies of Emergency Dispatch
110 South Regent Street
8th Floor
Salt Lake City, UT 84111

Dear Ms. Wiggins:

The National Transportation Safety Board (NTSB) is an independent federal agency charged by Congress with investigating every civil aviation accident in the United States and significant accidents in other modes of transportation—railroad, highway, marine, and pipeline. We determine the probable cause of the accidents and issue safety recommendations aimed at preventing future accidents. In addition, we carry out special studies concerning transportation safety and coordinate the resources of the federal government and other organizations to assist victims and their family members affected by major transportation disasters.

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Accordingly, the NTSB makes the following safety recommendation to the International Academies of Emergency Dispatch. Additional information regarding this recommendation can be found in the noted section of the report.

- Revise *Protocol-60 Gas Leak/Gas Odor (Natural and Liquefied Petroleum Gases)* to direct dispatchers to notify the gas company when any odor call is received. **(P-19-005) (See section 2.4.3.)**

The NTSB is vitally interested in this recommendation because it is designed to prevent accidents and save lives. We would appreciate a response within 90 days, detailing the actions you have taken or intend to take to implement this recommendation. When replying, please refer to the safety recommendation by number (for example, P-19-005). We encourage you to submit your response to correspondence@ntsb.gov. If your reply exceeds 20 MB, including attachments, please e-mail us at the same address for instructions on how to send larger documents. Please do not submit both an electronic copy and a hard copy of the same response.

Sincerely,

Robert L. Sumwalt, III
Chairman

National Transportation Safety Board

Washington, DC 20594



Office of the Chairman

June 10, 2019

Mr. William R. Bryant, MCP, CBO
President
International Code Council
500 New Jersey Avenue, NW
6th Floor
Washington, DC 20001

Dear Mr. Bryant:

The National Transportation Safety Board (NTSB) is an independent federal agency charged by Congress with investigating every civil aviation accident in the United States and significant accidents in other modes of transportation—railroad, highway, marine, and pipeline. We determine the probable cause of the accidents and issue safety recommendations aimed at preventing future accidents. In addition, we carry out special studies concerning transportation safety and coordinate the resources of the federal government and other organizations to assist victims and their family members affected by major transportation disasters.

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- The detection of natural gas through odorants and methane.

Accordingly, the NTSB makes the following safety recommendation to the International Code Council. Additional information regarding this recommendation can be found in the noted section of the report.

- In coordination with the Gas Technology Institute and the National Fire Protection Association, incorporate provisions in the *International Fuel Gas Code* that requires methane detection systems for all types of residential occupancies with gas service. At a minimum, the provisions should cover the installation, maintenance, placement of the detectors, and testing requirements. **(P-19-006) (See section 2.5.2.)**

The NTSB is vitally interested in this recommendation because it is designed to prevent accidents and save lives. We would appreciate a response within 90 days, detailing the actions you have taken or intend to take to implement this recommendation. When replying, please refer to the safety recommendation by number (for example, P-19-006). We encourage you to submit your response to correspondence@ntsb.gov. If your reply exceeds 20 MB, including attachments, please e-mail us at the same address for instructions on how to send larger documents. Please do not submit both an electronic copy and a hard copy of the same response.

Sincerely,

Robert L. Sumwalt, III
Chairman

National Transportation Safety Board

Washington, DC 20594



Office of the Chairman

June 10, 2019

Mr. James Pauley
President
National Fire Protection Association
1 Batterymarch Park
Quincy, MA 02169-7471

Dear Mr. Pauley:

The National Transportation Safety Board (NTSB) is an independent federal agency charged by Congress with investigating every civil aviation accident in the United States and significant accidents in other modes of transportation—railroad, highway, marine, and pipeline. We determine the probable cause of the accidents and issue safety recommendations aimed at preventing future accidents. In addition, we carry out special studies concerning transportation safety and coordinate the resources of the federal government and other organizations to assist victims and their family members affected by major transportation disasters.

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- The detection of natural gas through odorants and methane.

Accordingly, the NTSB makes the following safety recommendation to the National Fire Protection Association. Additional information regarding this recommendation can be found in the noted section of the report.

- In coordination with the Gas Technology Institute and the International Code Council, revise the *National Fuel Gas Code, National Fire Protection Association 54* to require methane detection systems for all types of residential occupancies with gas service. At a minimum, the provisions should cover the installation, maintenance, placement of the detectors, and testing requirements. **(P-19-007) (See section 2.5.2.)**

The NTSB is vitally interested in this recommendation because it is designed to prevent accidents and save lives. We would appreciate a response within 90 days, detailing the actions you have taken or intend to take to implement this recommendation. When replying, please refer to the safety recommendation by number (for example, P-19-007). We encourage you to submit your response to correspondence@ntsb.gov. If your reply exceeds 20MB, including attachments, please e-mail us at the same address for instructions on how to send larger documents. Please do not submit both an electronic copy and a hard copy of the same response.

Sincerely,

Robert L. Sumwalt, III
Chairman

National Transportation Safety Board

Washington, DC 20594



Office of the Chairman

June 10, 2019

Mr. David C. Carroll
President and Chief Executive Officer
Gas Technology Institute
1700 S. Mount Prospect Road
Des Plaines, IL 60018

Dear Mr. Carroll:

The National Transportation Safety Board (NTSB) is an independent federal agency charged by Congress with investigating every civil aviation accident in the United States and significant accidents in other modes of transportation—railroad, highway, marine, and pipeline. We determine the probable cause of the accidents and issue safety recommendations aimed at preventing future accidents. In addition, we carry out special studies concerning transportation safety and coordinate the resources of the federal government and other organizations to assist victims and their family members affected by major transportation disasters.

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- The detection of natural gas through odorants and methane.

Accordingly, the NTSB makes the following safety recommendation to the Gas Technology Institute. Additional information regarding this recommendation can be found in the noted section of the report.

- In coordination with the National Fire Protection Association and the International Code Council, work to develop standards for methane detection systems for all types of residential occupancies in both the *International Fuel Gas Code* and the *National Fuel Gas Code, National Fire Protection Association 54*. At a minimum, the provisions should cover the installation, maintenance, placement of the detectors, and testing requirements. **(P-19-008) (See section 2.5.2.)**

The NTSB is vitally interested in this recommendation because it is designed to prevent accidents and save lives. We would appreciate a response within 90 days, detailing the actions you have taken or intend to take to implement this recommendation. When replying, please refer to the safety recommendation by number (for example, P-19-008). We encourage you to submit your response to correspondence@ntsb.gov. If your reply exceeds 20MB, including attachments, please e-mail us at the same address for instructions on how to send larger documents. Please do not submit both an electronic copy and a hard copy of the same response.

Sincerely,

Robert L. Sumwalt, III
Chairman

National Transportation Safety Board

Washington, DC 20594



Office of the Chairman

June 10, 2019

Mr. Adrian P. Chapman
President and Chief Executive Officer
Washington Gas Light Company
1000 Maine Avenue, SW
Washington, DC 20024

Dear Mr. Chapman:

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- The notification of the natural gas odor to Washington Gas Light Company.
- The detection of natural gas through odorants and methane.

Accordingly, the NTSB makes the following safety recommendations to the Washington Gas Light Company. Additional information regarding these recommendations can be found in the noted sections of the report.

- Throughout the Washington Gas network, implement an audit program to verify the data on the service forms used to determine the location and condition of mercury service regulators to ensure the accuracy of this safety-critical data. **(P-19-009) (See section 2.3.9.)**
- Revise your procedures and field forms to require technicians to verify the integrity of vent lines following the testing of indoor service regulators throughout the Washington Gas network. **(P-19-010) (See section 2.3.5.)**
- Establish a time frame with specific dates and milestones for the replacement of mercury service regulators throughout the Washington Gas network that recognizes the need to expedite this program and that prioritizes multifamily dwellings where mercury service regulators are located inside the property. (P-19-011) (See section 2.3.10)
- Install all new service regulators outside occupied structures. **(P-19-012) (See section 2.3.10.)**
- Relocate existing interior service regulators outside occupied structures whenever the gas service line, meter, or regulator is replaced. In addition, multifamily structures should be prioritized over single-family dwellings. **(P-19-013) (See section 2.3.10.)**

The NTSB is vitally interested in these recommendations because they are designed to prevent accidents and save lives. We would appreciate a response within 90 days, detailing the actions you have taken or intend to take to implement these recommendations. When replying, please refer to the safety recommendations by number (for example, P-19-009). We encourage you to submit your response to correspondence@ntsb.gov. If your reply exceeds 20MB, including attachments, please e-mail us at the same address for instructions on how to send larger documents. Please do not submit both an electronic copy and a hard copy of the same response.

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Chairman