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WMSC Inspection Report 20250604

ISSUED 06/09/25

Inspection Details

Title: Electrical Safety Gloves Inspection Location: New Carrollton (D99) Service and Inspection Shop (S&I) Date of Inspection: 6/4/25 Time of Inspection: 7:00am to 7:30am Unannounced Risk-Based (C-0042; Urgent Hazard notice sent 5/28/25 as part of WMSC Communication Systems Audit) Functional Area: Roadway Worker Protection Hazard Rating: 2C

Overview

On June 4, 2025, WMSC Inspectors conducted an inspection of the personal protective equipment (PPE) at the New Carrollton Service and Inspection Shop (S&I)—specifically, Class 0 Electrical Gloves. Class 0 rubber insulating gloves are high voltage electrical gloves used to protect workers from electrocution when working on or around high voltage electricity. For example when testing whether third rail electricity is present (also referred to as "hot sticking the third rail"), Warning Strobe Alarm Device (WSAD) placement and removal, shunt placement and removal, third rail insulating mat placement and removal, and any other work that requires the use of electrical insulating gloves. Class 0 electrical gloves require testing to ensure proper protection: they expire six months after the sealed package is opened, but if the package has not been opened, the gloves expire one year from the stamped date.

This is a risk-based inspection based on corrective action plan C-0042, which was created to address finding 5 from the 2020 Audit of Roadway Worker Protection and Training, "WMATA employees are not consistently following RWP Rule 5.12 for equipment calibration." C-0042 remains open and is presently scheduled to close in July 2026. Prior to C-0042, Metrorail did not have an agency-wide program for managing and testing Class 0 electrical gloves. As of September 9, 2024, Metrorail created a program that must be implemented by all relevant Metrorail departments by September 9, 2025. Two quarters of reporting will then be provided to the WMSC via regular C-0042 submittals.



Although Metrorail's intended long-term fix is underway via C-0042, the WMSC must continue to inform Metrorail where instances of out of compliance gloves are identified. On May 21, 2025, during a Communication Systems Audit observation, the WMSC found such an instance. This was conveyed to Metrorail through that audit as an urgent hazard. On May 21, 2025, at the Carmen Turner Facility (CTF), prior to heading to the field, WMSC personnel checked the Class 0 electrical gloves of all personnel who would be involved in conducting the planned preventative maintenance. The gloves provided by two personnel set to go out in the field were expired. One of the sets of gloves was dated as tested on September 26, 2022. The other set of gloves was dated as expiring on March 10, 2025. When looking for replacement gloves, personnel identified a further six pairs of gloves that had expired. All expired gloves were removed and quarantined by a supervisor at the CTF radio shop.

The number of out of compliance gloves at the May 21, 2025 audit observation set the need for this risk-based inspection. Therefore, the objective of this inspection was to verify the presence of properly tested Class 0 electrical gloves at the New Carrollton Rail Yard Service & Inspection shop. Upon arrival, WMSC inspectors entered the administrative office and informed Metrorail personnel of the intent to conduct an inspection on the presence and use of all Class 0 electrical gloves. WMSC inspectors were referred to the high voltage (HV) glove daily inspection sheet for June 2025 (pictured, in part, below) and two sets of electrical gloves that were affixed to the wall and stored in tote canvas bags. Additionally, Metrorail personnel conveyed that a clip board attached to the same wall contained information relevant to the compliance of the gloves. WMSC Inspectors requested an escort be provided so that any defects or observations could be independently verified or mitigated.

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Photo 1: Location of high voltage gloves throughout the S & I shop – Daily Inspection June 2025.

Using the high voltage (HV) glove daily inspection sheet for June 2025 provided by Metrorail, WMSC Inspectors went to locations noted on the inventory document and checked for Class 0 gloves. The table below represents the outcome of their observations.

Glove Location Listed	Size	Exp. Date stated	Actual Exp Date	Compliance Verified
PI Pit – 17N Stinger	Large	12/15/2025	No gloves found	NO
Blow Pit – 17S Stinger	Large	12/15/2025	No gloves found	NO
19N Stinger	Ex Large	12/15/2025	No gloves found	NO
19S Stinger	Large	12/25/2025	No gloves found	NO
20N Stinger	Large	12/25/2025	No gloves found	NO
21N Stinger	Large	12/25/2025	No gloves found	NO

Table 1: Locations identified for high voltage glove storage and daily inspection which found no glove nor any evidence of inspection compliance.

After concluding the inspection, WMSC inspectors conducted a debrief with the S&I Shop Supervisor, in accordance with Program Standard Section 6.F.1.

Defects and Corrective Actions

WMSC Inspections identify safety issues that may be classified as defects, findings, or recommendations. Findings and recommendations are defined by Program Standard Section 5.E.2 and 5.E.3, respectively. Ordinarily, issues identified in a WMSC inspection report are classified as defects. Defects are specific safety issues of non-conformance/non-compliance that are identified and that require remedial action.

This inspection did not identify any findings or recommendations and therefore does not require a WMSC Corrective Action Plan in accordance with Program Standard Section 5.E.4.

Defect Observations and Determinations

After being escorted to the locations listed on the high voltage (HV) glove daily inspection, WMSC Inspectors found zero gloves present at the indicated locations. Each listed location has the presence of high voltage electricity and that is why in-compliance electrical gloves are supposed to be maintained at those locations. Ultimately, WMSC Inspectors determined that the S&I shop office had two pairs of gloves whose compliance status could not be verified because it was not known when the gloves had been unpackaged to determine good-for-six-months date. The date on the two gloves found in the S&I shop states September 2024, approximately nine months prior to the WMSC inspection completed in June 2025. As the gloves inspected were not listed on the high voltage (HV) glove daily inspection, compliance is unknown.

WMSC Inspectors observed the high voltage (HV) glove daily inspection and determined the inspection sheet is being signed by Metrorail personnel. Personnel are not verifying the presence or compliance of safety equipment but are signing the sheet as if this was done. Metrorail is not



verifying the accuracy of the information provided from the high voltage glove daily inspection sheet.

Standard Number: 4480-2-02/01- Personal Protective Equipment (PPE) Program - September 9, 2024

- 5.2. Departmental Managers and Supervisors are responsible for:
- 5.2.10. Maintaining documentation as required to ensure regulatory compliance.

Defect 1

Metrorail's high voltage (HV) gloves daily checklist indicated that there are six pairs of gloves available for employee use, but none could be found at the six stated locations.

Hazard Rating: 2C

Defect 2

Metrorail personnel are signing their initials to confirm they are verifying safety equipment that they are not inspecting, evident by the lack of Class 0 gloves at any of the six locations stated on the high voltage (HV) glove daily inspection sheet for June 2025.

Hazard Rating: 2C

Defect 3

Two pairs of high voltage gloves were identified during the inspection in the service and inspection shop office, but the gloves inspected were not listed on the high voltage (HV) gloves daily checklist and their expiration date could not be determined. This is the challenge presented by Metrorail's system as the proper expiration date requires knowledge of when the glove package has been opened (Metrorail's rule states expiration occurs six months after the sealed package is opened, but if the package has not been opened, the gloves expire one year from the stamped date.)

Hazard Rating: 2C



Photo 2: Two pairs of Class 0 rubber insulating gloves available for usage throughout the entire S&I shop

Next Steps

Please respond **by Thursday, June 12, 2025,** to acknowledge receipt and to convey responses to the WMSC regarding what, if any, actions will be or have been taken in response.