



## NOTICE OF NON-COMPLIANCE:

### 2025 WMSC AUDIT OF METRORAIL'S ELEVATORS AND ESCALATORS – FINDING #3

ISSUED FEBRUARY 5, 2026

#### Summary

As part of the [2025 WMSC Audit of Metrorail's Elevators and Escalators](https://wmsc.gov/audits/) (<https://wmsc.gov/audits/>), the Washington Metrorail Safety Commission (WMSC) issued a finding stating that Metrorail personnel are entering elevator pits which have active electrical circuits with standing water present.

As a result, a corrective action plan (CAP) is necessary to address this finding. The WMSC Program Standard states in section 9.C.3.a that “Within 30 days from the date the WMSC issues a finding or recommendation, WMATA must propose a suitable CAP (corrective action plan).” CAP WMSC-25-C0313 should have been developed and a draft submitted to the WMSC by November 14, 2025, however, WMATA has objected to, and has not provided a draft corrective action plan.

#### Authority

The Washington Metrorail Safety Commission (WMSC) Compact (P.L. 115-54), Article IV, Powers, Sec. 30(a) states “In carrying out its purposes, the Commission, through its Board or designated employees or agents, shall, consistent with federal law: (a) Adopt, revise, and distribute a written State Safety Oversight Program[]” and Sec. 30(c) states “(c) Require, review, approve, oversee, and enforce the adoption and implementation of any Corrective Action Plans that the Commission deems appropriate[.]” Further, WMSC Compact Sec. 31(c) provides that the WMSC may “[c]ompel WMATA’s compliance with any Corrective Action Plan or order of the Commission by such means as the Commission deems appropriate...”.

Pursuant to WMSC Compact Sec. 30(a) and 30(b) and 49 CFR sec. 674.27(a)(1), version 8 of the WMSC Program Standard became effective on October 1, 2025 (maybe found at <https://wmsc.gov/program-standard/>). Program Standard sec. 9.C states that “Each finding issued by the WMSC requires WMATA to develop a suitable CAP. The WMSC may also require WMATA to develop a CAP due to other types of findings or conclusions, including from the sources noted in Section 9.A.”

This Notice of Non-Compliance is brought in accordance with Program Standard sec. 11.B:

In the event WMATA fails to comply with any provision of this Program Standard, the WMSC may issue a notice of non-compliance, provide notice that the WMSC is invoking a power provided in Section 11.C, or both. The WMSC will identify the noncompliance issue and state any action required of WMATA in an email to the WMATA Executive Vice President and Chief

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Safety & Readiness Officer, or the General Manager. WMATA must then respond by the deadline set by the WMSC. If WMATA fails to address the issue, the WMSC may take further action described in this Section 11.

### **Background**

Elevator mechanics are required to enter the pits underneath elevators to complete vital preventative and corrective maintenance tasks, however, Metrorail's elevators can be subject to water intrusion issues given the operating environment. It is imperative that workers take safety precautions to protect themselves when those conditions exist.

Each of Metrorail's Job Hazard Analyses for work within elevator pits states that workers must "Be vigilant for oil / water on the pit floor" and "not work in a pit with standing water." Metrorail's elevator operating environment—aboveground or underground—makes the units susceptible to water intrusion. Metrorail policy prohibits personnel from entering areas with standing water while electrical circuits are active; however, personnel reported entering areas with water at knee or waist depth that required pumping out of the pit. Personnel do not conduct voltage testing prior to entering the pit.

In interviews with two elevator and escalator journeymen, it was indicated that they did not receive personal protective equipment related to electrical hazards, such as electrical gloves or electrical hazard waders. As part of the audit, the WMSC requested a list of "all PPE (Personal Protective Equipment) required for elevator and escalator personnel." Electrical gloves and electrical hazard waders are not included on the list of PPE as being provided to Metrorail personnel working on elevators and escalators.

The WMSC notified Metrorail of this finding on March 26, 2025, prior to the exit conference on March 28, 2025, so that Metrorail could immediately address this hazard.

Worker safety is a fundamental part of the safety of the WMATA Rail System, and it is identified in WMATA's Public Transportation Agency Safety Plan. The WMSC is obligated to oversee the safety elements in WMATA's Agency Safety Plan. The WMSC and WMATA have had ongoing discussions attempting to resolve the differences that are preventing Metrorail from producing worker safety-related documents and required corrective actions. However, WMATA stated that it stands by its objections for producing any worker safety information. As the WMSC explained in its written response to Metrorail's written objections, and in subsequent discussions, Metrorail's objections to the WMSC's authority are without merit and do not justify its refusal to fully respond and participate in the CAP development process, and their lack of required corrective action continues to put WMATA personnel worker safety at risk.

The WMSC issued its final report for this audit on October 15, 2025. From there, in accordance with the WMSC Program Standard (section 9.C.3.a) a draft corrective action plan should have been submitted to the WMSC on November 14, 2025. To date, a draft CAP has not been received.

### **Compliance**

The corrective action plan related to Finding #3 of the WMSC's 2025 Audit of Elevators and Escalators has not been received. For WMATA to return to compliance, WMATA must submit a draft corrective action plan for WMSC review and approval.

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