



U.S. Department  
of Transportation  
**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue SE  
Washington DC 20590

# 2019 Hazardous Liquid State Program Evaluation

for

Alabama Public Service Commission

## Document Legend

### PART:

- O -- Representative, Dates and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- State Qualifications
- D -- Program Performance
- E -- Field Inspections
- F -- Damage prevention and Annual report analysis
- G -- Interstate Agent/Agreement States



2019 Hazardous Liquid State Program Evaluation -- CY 2019  
Hazardous Liquid

**State Agency:** Alabama

**Agency Status:**

**Date of Visit:** 04/13/2020 - 04/17/2020

**Agency Representative:** Wallace Jones - Director, Gas Pipeline Safety Division

**PHMSA Representative:** Glynn Blanton, US DOT/PHMSA State Evaluator

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

**Name/Title:** Twinkle Andress Cavanaugh, President

**Agency:** Alabama Public Service Commission

**Address:** 100 N. Union St., Suite 800

**City/State/Zip:** Montgomery, Alabama 36104

**Rating:**

**60105(a):** Yes **60106(a):** No **Interstate Agent:** No

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**INSTRUCTIONS:**

Complete this evaluation in accordance with the Evaluator Guidance for conducting state pipeline safety program evaluations. The evaluation should generally reflect state program performance during CY 2019 (not the status of performance at the time of the evaluation). A deficiency in any one part of a multiple-part question should be scored as "Needs Improvement." Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the appropriate notes/comments section. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and they OBJECTIVELY reflect the state's program performance for the question being evaluated. Increasing emphasis is being placed on how the state pipeline safety programs conduct and execute their pipeline safety responsibilities (their performance). This evaluation, together with selected factors reported in the state's annual progress report attachments, provide the basis for determining the state's pipeline safety grant allocation.

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**Scoring Summary**

**PARTS**

**Possible Points    Points Scored**

A    Progress Report and Program Documentation Review  
B    Program Inspection Procedures  
C    State Qualifications  
D    Program Performance  
E    Field Inspections  
F    Damage prevention and Annual report analysis  
G    Interstate Agent/Agreement States

0  
15  
10  
50  
15  
4  
0

0  
15  
10  
50  
15  
4  
0

**TOTALS**

**94                      94**

**State Rating** .....

**100.0**

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## PART A - Progress Report and Program Documentation Review

Points(MAX) Score

1 Were the following Progress Report Items accurate?

Info Only Info Only

Info Only = No Points

- a. Stats On Operators Data - Progress Report Attachment 1
- b. State Inspection Activity Data - Progress Report Attachment 2
- c. List of Operators Data - Progress Report Attachment 3\*
- d. Incidents/Accidents Data - Progress Report Attachment 4\*
- e. Stats of Compliance Actions Data - Progress Report Attachment 5\*
- f. List of Records Kept Data - Progress Report Attachment 6 \*
- g. Staff and TQ Training Data - Progress Report Attachment 7
- h. Compliance with Federal Regulations Data - Progress Report Attachment 8
- i. Performance and Damage Prevention Question Data - Progress Report Attachment 10\*

Evaluator Notes:

- a. New intrastate crude oil operators were added from previous year: Geneis Pipeline,Pine Energies & Plains Marketing.
- b. Nineteen percent of total inspection person days were spend on construction.
- c. Attachments 1 & 3 agree. No issues of concern.
- d. No incidents in CY2019.
- e. Three violations cited and three to be carryover into current year. One compliance action taken. No civil penalty assessed.
- f. Reviewed Administrators Monthly, Quarterly and Annual Person-Day Reports found no issues with information. Records maintained were consistent from previous CY2018 review.
- g. Verification of TQ training records confirm all three inspectors are qualified for HL. Two are category II and one is category III.
- h. Automatic adoption of regulations, Civil penalty is \$200,000/\$2 million.
- i. Description is concise with past and future performance goals. Answers to Damage Prevention questions on action to be taken on enforcement was provided. Authority will be acting in January 2020 in making changes to their law.

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



## PART B - Program Inspection Procedures

Points(MAX) Score

- |   |  |   |   |
|---|--|---|---|
| 1 | Do written procedures address pre-inspection, inspection and post inspection activities for each of the following inspection types: Chapter 5.1<br>Yes = 5 No = 0 Needs Improvement = 1-4  | 5 | 5 |
|   | <ul style="list-style-type: none"><li>a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspections</li><li>b. IMP Inspections (reviewing largest operator(s) plans annually)</li><li>c. OQ Inspections</li><li>d. Damage Prevention Inspections</li><li>e. On-Site Operator Training</li><li>f. Construction Inspections (annual efforts)</li></ul> |   |   |

### Evaluator Notes:

- a. Alabama Pipeline Safety Program Operations Plan identifies these requirements on pages 12-15, Section V. Conducting Inspections: Sub-Sections A-G.
- b. DIMP inspections are listed on page 19, Section V. Conducting Inspections: Sub-Sections P. Appendix C - Item R. page 18 of PHMSA Form -1, Subpart O, Pipeline Integrity Management for IMP (192.901 - 192.951); Appendix C - Item A, page 2, para. 5. (DIMP) and para. 6, (IMP); Appendix C - Item Q, page 25 of PHMSA Form - 2, Subpart P, Pipeline Integrity Management (192.1001 - 192.1005)
- c. This item is listed on page 17, Section I. Training and Operator Qualification.
- d. This item is located on pages 18, Section M, Damage Prevention Activities.
- e. This information is located on pages 18, Operator Training.
- f. This requirement is located on pages 15-17, Section V, Subsection H. AL PSC has their own construction forms. All Alabama operator are required to file a construction notification to the agency prior to work being performed. This is a PSC rule.

- |   |   |   |   |
|---|---|---|---|
| 2 | Do written procedures address inspection priorities of each operator, and if necessary each unit, based on the following elements and time frames established in its procedures? Chapter 5.1<br>Yes = 4 No = 0 Needs Improvement = 1-3  | 4 | 4 |
|   | <ul style="list-style-type: none"><li>a. Length of time since last inspection</li><li>b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)</li><li>c. Type of activity being undertaken by operators (i.e. construction)</li><li>d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.)</li><li>e. 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)</li><li>f. Are inspection units broken down appropriately?</li></ul> |   |   |

### Evaluator Notes:

Located in Appendix D-Risk Management Assessments of Alabama Pipeline Safety Program Operations Plan information on risk management is identified. The document contains all the elements required to rank risk and priorities their inspection visits. Appendix D is located on pages 35 & 36. Annual review of inspection units is conducted by inspectors and program manager.

- |   |  |   |   |
|---|--|---|---|
| 3 | (Compliance Procedures) Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1<br>Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
|   | <ul style="list-style-type: none"><li>a. Procedures to notify an operator (company officer) when a noncompliance is identified</li></ul>   |   |   |

- b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns
- c. Procedures regarding closing outstanding probable violations

Evaluator Notes:

- a. Yes, this is listed in Alabama Public Service Commission procedure manual in Section S. Notices of Probable Violations page 20.
- b. Yes, this information is listed under section U. Notice of Probable Violation Tracking, page 21.
- c. Yes, this information is listed under section V. Removal or Correction of a Probable Violation, pages 22-23.

**4** (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident? 3 3

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

- a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports
- b. If onsite investigation was not made, do procedures require on-call staff to obtain sufficient information to determine the facts to support the decision not to go on-site.

Evaluator Notes:

- a. Alabama Pipeline Safety Program Operations Plan on pages 25-29, VI. Investigation of Incidents. address this issue.
- b. Yes, Alabama PSC's GPS Rule #9, requires the pipeline operator to give telephonic notice of all incidents by calling (334) 242-5778 to report incidents during normal business hours of 8:00 AM to 5:00 PM. After hours, the operator is required to call the Pipeline Safety Investigator assigned to or located in the operator's region of the state (North, Central or South Alabama).Page 25 of the Operations Plan, Para. B - General Procedures, 2nd paragraph; page 26, first full paragraph; page 28, para. E. Telephone Notification address this item.

**5** General Comments: Info Only Info Only  
Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section of the review.

Total points scored for this section: 15  
Total possible points for this section: 15



## PART C - State Qualifications

Points(MAX) Score

- |   |  |   |   |
|---|--|---|---|
| 1 | Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.4<br>Yes = 5 No = 0 Needs Improvement = 1-4   | 5 | 5 |
|   | <ul style="list-style-type: none"><li>a. Completion of Required OQ Training before conducting inspection as lead</li><li>b. Completion of Required IMP Training before conducting inspection as lead</li><li>c. Root Cause Training by at least one inspector/program manager</li><li>d. Note any outside training completed</li><li>e. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1)</li></ul> |   |   |

Evaluator Notes:

- a. ? Yes, Program Manager and two of the three inspectors have completed the required Gas & HL courses requirements.
  - b. ? Yes, inspectors and Program Manager have completed the required DIMP/IMP training courses.
  - c. ? Yes, Program Manager and three inspectors have completed the root cause course.
  - d. ? Yes, inspectors continue to obtain HAZWOPER Certifications training.
  - e. ? Yes, a review of TQ Blackboard confirm 2 inspectors are qualified to perform a standard HL inspection as the lead.
- Jonathan Kimbrel and Judy Ramsey.

- |   |  |   |   |
|---|--|---|---|
| 2 | Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1<br>Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|---|--|---|---|

Evaluator Notes:

Yes, Mr. Jones continues to demonstrate an excellent understanding of the requirements of the pipeline safety program. He has completed all TQ courses within the required three years from attending the first course. He has over forty-one plus years of natural gas experience. He is currently the Chairman of the National Association of Pipeline Safety Representatives.

- |   |  |           |           |
|---|--|-----------|-----------|
| 3 | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

No loss of points occurred in this section of the review.

Total points scored for this section: 10  
Total possible points for this section: 10



## PART D - Program Performance

Points(MAX) Score

- |   |  |   |   |
|---|--|---|---|
| 1 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1<br>Yes = 5 No = 0 Needs Improvement = 1-4   | 5 | 5 |
|   | <ul style="list-style-type: none"><li>a. Standard (General Code Compliance)</li><li>b. Public Awareness Effectiveness Reviews</li><li>c. Drug and Alcohol</li><li>d. Control Room Management</li><li>e. Construction (did state achieve 20% of total inspection person-days?)</li><li>f. OQ (see Question 3 for additional requirements)</li><li>g. IMP (see Question 4 for additional requirements)</li></ul> |   |   |

### Evaluator Notes:

Information provided by program manager confirmed all inspections units were performed in accordance to written procedures. Twenty percent of the inspections performed were in the construction category. Thirteen inspection days were spent on standard inspections, three inspections person days on drug and alcohol, one inspection person day on operator qualification and additional inspections person days were spend on follow-up and damage prevention.

- |   |   |    |    |
|---|---|----|----|
| 2 | Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1. Do inspection records indicate that adequate reviews of procedures, records and field activities, including notes and the appropriate level of inspection person-days for each inspection, were performed?<br>Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
|   | <ul style="list-style-type: none"><li>a. Standard (General Code Compliance)</li><li>b. Public Awareness Effectiveness Reviews</li><li>c. Drug and Alcohol</li><li>d. Control Room Management</li><li>e. Construction</li><li>f. OQ (see Question 3 for additional requirements)</li><li>g. IMP (see Question 4 for additional requirements)</li></ul>   |    |    |

### Evaluator Notes:

Using the random generator program, three operators were selected to review inspection reports. Due to the selection one operator DENBURY ONSHORE, LLC was found abandoned in CY2018 and not inspected in CY2019. Therefore, an additional operator, Hunt Refining Company was added to the list. All inspection reports for these operators were well documented and established inspection schedule was met in accordance to written procedures.

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|---|---|---|---|
| 3 | Is state verifying operators OQ programs are up to date? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals established in the operator's plan. 49 CFR 192 Part N<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

### Evaluator Notes:

Yes, a review of two operators inspected found verification of plans were conducted.

- |   |  |   |   |
|---|--|---|---|
| 4 | Is state verifying operator's integrity management Programs (IMP)? This should include a review of plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operator's plan(s). 49 CFR 192 Subpart P<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|   | <ul style="list-style-type: none"><li>a. Are the state's largest operator(s) plans being reviewed annually?</li></ul>  |   |   |

### Evaluator Notes:

This item is covered in their inspection form. Question 16 on the standard inspection form was developed and used to check this item. A review of form confirms this was checked.

- 5 Did the state review the following (these items are NTSB recommendations to PHMSA that have been deemed acceptable response based on PHMSA reviewing these items during the evaluation process): Chapter 5.1 2 2  
Yes = 2 No = 0 Needs Improvement = 1  
a. Operator records of previous accidents and failures including reported third-party damage and leak response to ensure appropriate operator response as required by 192.617; and  
b. Directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies;

Evaluator Notes:

- a. This item is located in Appendix C, Item E, Question 3 on the Liquid Standard Inspection form.  
b. This item is addressed in Appendix C, Items E, Question 4 .

- 6 Did the State verify Operators took appropriate action regarding advisory bulletins issued since the last evaluation? (Advisory Bulletins Current Year) 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The advisory bulletins are discussed with the operator during the inspection and listed on the federal form.

- 7 (Compliance Activities) Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1 10 10  
Yes = 10 No = 0 Needs Improvement = 1-9  
a. Were compliance actions sent to company officer or manager/board member if municipal/government system?  
b. Were probable violations documented properly?  
c. Resolve probable violations  
d. Routinely review progress of probable violations  
e. Did state issue compliance actions for all probable violations discovered?  
f. Can state demonstrate fining authority for pipeline safety violations?  
g. Does Program Manager review, approve and monitor all compliance actions? (note: Program Manager or Senior Official should sign any NOPV or related enforcement action)  
h. Did state compliance actions give reasonable due process to all parties? Including "show cause" hearing, if necessary.  
i. Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns  
j. Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. (Incident investigations do not need to meet 30/90-day requirement)

Evaluator Notes:

- a. Yes, a review of Hunt Refining Company confirms the compliance letter was sent to company officer.  
b. Yes.  
c. Yes, violations were follow-up with inspection and correspondence from operator.  
d. Yes, a review of spreadsheet confirm violations were routinely monitored by program manager or administrative assistant.  
e. Yes, compliance action was taken but no civil penalty.  
f. Yes, a civil penalty of \$3,000 was assessed against Camp Hill Utilities Board in CY2019.  
g. & h. Yes, information on civil penalty and show cause hearing is provided in the compliance and non-compliance letters.  
i. An exit interview is conducted immediately after the inspection and an exit interview form is completed and attached to the inspection report.  
j. Yes, a response is provided to the operator on the inspection performed or NOPV within 60 days after the inspection report is approved.

- 8 (Incident Investigations) Were all incidents investigated, thoroughly documented, with conclusions and recommendations? 10 10  
Yes = 10 No = 0 Needs Improvement = 1-9



- a. Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports?
- b. Did state keep adequate records of Incident/Accident notifications received?
- c. If onsite investigation was not made, did the state obtain sufficient information from the operator and/or by means to determine the facts to support the decision not to go on site?
- d. Were onsite observations documented?
- e. Were contributing factors documented?
- f. Were recommendations to prevent recurrences, where appropriate, documented?
- g. Did state initiate compliance action for any violations found during any incident/accident investigation?
- h. Did state assist Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA?
- i. Does state share any lessons learned from incidents/accidents?

Evaluator Notes:

- a. Yes, their procedures pertaining to incident investigations are in Alabama Pipeline Safety Program Operations Plan on pages 25-29, VI. Investigation of Incidents.
- b. thru i. No incidents occurred in CY2019.

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- |          |   |   |   |
|----------|---|---|---|
| <b>9</b> | Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Response was not required due to no issues of concern or findings in CY2018 state program evaluation.

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- |           |   |           |           |
|-----------|---|-----------|-----------|
| <b>10</b> | Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5<br>Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

Evaluator Notes:

Yes, the 2019 AL PSC pipeline safety seminar was held in Montgomery, AL on December 3-5, 2019. Number of attendees were three hundred and twenty-five.

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- |           |  |           |           |
|-----------|--|-----------|-----------|
| <b>11</b> | Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission?<br>Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

Evaluator Notes:

Yes, Alabama PSC HL Field Evaluation Report question 8 addresses this item and on page 3 of the Federal Standard Inspection form. A review of inspection reports confirms they reviewed this requirement.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>12</b> | Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public).<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

This is accomplished through the Alabama Natural Gas Association and AL PSC websites. Information about compliance and other safety items are listed.

- 
- |           |   |   |   |
|-----------|---|---|---|
| <b>13</b> | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

A review of Pipeline Data Mart confirmed no safety related condition reports in CY2019.

- 14** Was the State responsive to: 1 1  
Yes = 1 No = 0 Needs Improvement = .5  
a. Surveys or information requests from NAPS or PHMSA;  
b. Operator IM notifications; and  
c. PHMSA Work Management system tasks?

Evaluator Notes:

- a Yes, discussions with Robert Clarillos confirm Wallace Jones responded to all survey monkey request.  
b & c. There was not instances or findings that indicated AL PSC did not respond to IM and WMS task requests.

- 15** If the State has issued any waivers/special permits for any operator, has the state verified 1 1  
conditions of those waivers/special permits are being met? This should include having the  
operator amend procedures where appropriate.  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No active waivers pertaining to HL operators in AL.

- 16** Were pipeline program files well-organized and accessible? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

Yes, a discussion with Program Manager confirmed the program files have not changed from my review last year. Therefore, no issues of concern.

- 17** Discussion with State on accuracy of inspection day information submitted into State 3 3  
Inspection Day Calculation Tool (SICT). Has the state updated SICT data?  
Yes = 3 No = 0 Needs Improvement = 1-2

Evaluator Notes:

A review of the SICT program was discussed and reviewed with Wallace Jones. He is familiar with how to make changes to the SICT numbers for Gas & HL programs.

- 18** Discussion on State Program Performance Metrics found on Stakeholder Communication Info Only Info Only  
site.\ http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805  
Info Only = No Points

Evaluator Notes:

Reviewed with Program Manager the State Program Performance Metrics. It was suggested to add this website to the AL PSC website.

- 19** Did the state encourage and promote operator implementation of Pipeline Safety 1 1  
Management Systems (PSMS), or API RP 1173? This holistic approach to improving  
pipeline safety includes the identification, prevention and remediation of safety hazards.  
Info Only = No Points  
a. https://pipelinesms.org/  
b. Reference AGA recommendation to members May 20, 2019

Evaluator Notes:

This item was presented at the AL PSC Seminar by Steve Adam with Energy WorldNet.

- 20** General Comments: Info Only Info Only  
Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section of the review.

Total points scored for this section: 50  
Total possible points for this section: 50

## PART E - Field Inspections

Points(MAX) Score

- 1 Operator, Inspector, Location, Date and PHMSA Representative (enter specifics into the comments box below) Info Only Info Only

Info Only = No Points

- What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc)
- When was the unit inspected last?
- Was pipeline operator or representative present during inspection?
- Effort should be made to observe newest state inspector with least experience

### Evaluator Notes:

\*Jonathan Kimbril was the lead inspector who conducted a Standard Inspection of Liquid Pipeline Operator \* The last inspection was conducted in October 23, 2019.\* Location of the inspection was Hunt Oil Company in Tuscaloosa, AL \* Yes (Clay Snider - Senior Compliance Analyst & Mark Brown - Oil Movement Leader )

- 2 Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

Yes, Jonathan Kimbril used AL PSC Form S; PHMSA ? Standard Inspection Report of a Liquid Pipeline Carrier

- 3 Did the inspector adequately review the following during the inspection 10 10  
Yes = 10 No = 0 Needs Improvement = 1-9

- Procedures (were the inspector's questions of the operator adequate to determine compliance?)
- Records (did the inspector adequately review trends and ask in-depth questions?)
- Field Activities/Facilities (did inspector ensure that procedures were being followed, including ensuring that properly calibrated equipment was used and OQ's were acceptable?)
- Other (please comment)
- Was the inspection of adequate length to properly perform the inspection?

### Evaluator Notes:

Yes, observed inspector reading each question in the inspection form and having Hunt Oil representatives provide answers. The responses were recorded in the inspection form. \* Inspector was observing comparing responses from operator to the operator's procedure manual. Excellent in-depth review was observed. \* Field portion of the review was scheduled the next day. \*Records review was a full day inspection and covered all sections of the regulations.

- 4 From your observation did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

Yes, Jonathan Kimbril has completed all TQ courses and qualified as a Hazardous Liquid Inspector. He has over 12 year's experience in liquid pipeline safety compliance work.

- 5 Did the inspector conduct an exit interview, including identifying probable violations? (If inspection is not totally completed the interview should be based on areas covered during time of field evaluation) 1 1  
Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

The exit interview was scheduled to be performed the next day. However, Joanthan reviewed the items that were covered at the end of the day. He found no areas of concern or violations.

- 6 Was inspection performed in a safe, positive, and constructive manner ? Info Only Info Only  
Info Only = No Points
- No unsafe acts should be performed during inspection by the state inspector

- b. What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)
- c. Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)
- d. Other

Evaluator Notes:

Yes, all protocols on COVID-19 was observed pertaining to meeting with the operator and other personnel. The field inspection was scheduled to be performed the next day.

7

General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No loss of points occurred this section of the review.

Total points scored for this section: 15  
Total possible points for this section: 15



**PART F - Damage prevention and Annual report analysis****Points(MAX) Score**

- |   |  |   |   |
|---|--|---|---|
| 1 | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues.<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

**Evaluator Notes:**

Yes, the Program Manager annually reviews all reports. If the reports have errors they are returned to the operator to make corrections. It was suggested each inspector perform an analysis of the operator's annual report and discuss the results with the operator during their inspection audit.

- |   |  |   |    |
|---|--|---|----|
| 2 | Has the state verified that the operators analyze excavation damages for the purpose of determining root causes and minimizing the possibility of a recurrence? (? 192.617)<br>Has the state verified that the operators have appropriately identified excavators who have repeatedly violated one-call laws and damaged their facilities. Have the operators taken steps to mitigate that risks? (? 192.1007)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | NA |
|---|--|---|----|

**Evaluator Notes:**

Question 5 on Alabama Public Service Commission inspection form address this item. Wallace Jones is familiar and aware of the importance of damage prevention and has reviewed the Alabama Excavation Damage Worksheet provided by PHMSA's David Appelbaum. Mr. Wallace has decided to add damage prevention questions pertaining to causes of damages to natural gas lines to their inspection forms.

- |   |   |   |    |
|---|---|---|----|
| 3 | Has the state reviewed the operator's annual report pertaining to Part D ? Excavation Damage?<br>Yes = 4 No = 0 Needs Improvement = 1-3 <ol style="list-style-type: none"><li>a. Is the information complete and accurate with root cause numbers?</li><li>b. Has the state evaluated the causes for the damages listed under "One-Call Notification Practices Not Sufficient" (Part D.1.a)?</li><li>c. Has the state evaluated the causes for the damages listed under "Locating Practices Not Sufficient" (Part D.1.b)? For each operator, does the state review the following?</li><li>d. Is the operator or its locating contractor(s) qualified and following written procedures for locating and marking facilities?</li><li>e. Is the operator appropriately requalifying locators to address performance deficiencies?</li><li>f. What is the number of damages resulting from mismarks?</li><li>g. What is the number of damages resulting from not locating within time requirements (no-shows)?</li><li>h. Is the operator appropriately addressing discovered mapping errors resulting in excavation damages?</li><li>i. Are mapping corrections timely and according to written procedures?</li><li>j. Has the state evaluated the causes for the damages listed under "Excavation Practices Not Sufficient" (Part D.1.c)?</li></ol> | 4 | NA |
|---|---|---|----|

**Evaluator Notes:**

A discussion with AL PSC Wallace Jones determined inspectors have reviewed these items with the operator but not documented the results. AL PSC does include in their written procedures Section IV, Inspection Planning, data from the annual report on damage that is considered in their rank risking. However, AL PSC understands the importance of these items and has agreed to add these questions to their standard inspection form.

- |   |   |   |   |
|---|---|---|---|
| 4 | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests?<br>Yes = 2 No = 0 Needs Improvement = 1 <ol style="list-style-type: none"><li>a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.</li><li>b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages?</li></ol> | 2 | 2 |
|---|---|---|---|

- c. Has the state evaluated which of the following best describes the reason for the excavation damages; i.e., operator or contractor not following written procedures, failure to maintain marks, failure to support exposed facilities, failure to use hand tools were required, failure to test-hole (pot hole), improper backfilling practices, failure to maintain clearance or insufficient excavation practices.
- d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?

Evaluator Notes:

- a. A review of past reports and incidents indicate the contractor stakeholder is causing the highest number of damages.
- b. Yes, this is checked and reviewed during audit reviews. Additionally, at the pipeline safety seminar and the Alabama Public Awareness Cooperative Training meetings across the state.
- c. Yes, contractors are not following procedures or best practices.
- d. Yes, this is accomplished at the Alabama Public Awareness Cooperative Training and review of construction sites by inspector staff.

**5** General Comments:  
Info Only = No Points

Info Only Info Only

Evaluator Notes:

No loss of points in this section of the review.

Total points scored for this section: 4  
Total possible points for this section: 4



## PART G - Interstate Agent/Agreement States

Points(MAX) Score

- 1 Were all inspections of interstate pipelines conducted using the Inspection Assistant program for documenting inspections. Info Only Info Only  
Info Only = No Points

Evaluator Notes:

AL PSC does not have a 60106 agreement with PHMSA nor an interstate agent.

- 2 If inspections were conducted independent of a PHMSA team inspection was notice of all identified probable violations provided to PHMSA within 60 days. Info Only Info Only  
Info Only = No Points

Evaluator Notes:

AL PSC does not have a 60106 agreement with PHMSA nor an interstate agent.

- 3 If inspections were conducted independent of a PHMSA team inspection was PHMSA immediately notified of conditions which may pose an immediate safety hazard to the public or environment? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

AL PSC does not have a 60106 agreement with PHMSA nor an interstate agent.

- 4 If inspections were conducted independent of a PHMSA team inspection did the state coordinate with PHMSA if inspections not were not included in the PHMSA Inspection Work Plan? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

AL PSC does not have a 60106 agreement with PHMSA nor an interstate agent.

- 5 Did the state take direction from and cooperate with PHMSA for all incident investigations conducted on interstate pipelines? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

AL PSC does not have a 60106 agreement with PHMSA nor an interstate agent.

- 6 General Comments: Info Only Info Only  
Info Only = No Points

Evaluator Notes:

AL PSC does not have a 60106 agreement with PHMSA nor an interstate agent.

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