



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

CAL FIRE - OFFICE OF THE STATE FIRE MARSHAL

## 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:** California

**Agency Status:**

**Date of Visit:** 07/06/2020 - 07/09/2020

**Agency Representative:** Jim Hosler

**PHMSA Representative:** Michael Thompson

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

**Name/Title:** Michael J. Richwine,, State Fire Marshal

**Agency:** CAL FIRE - Office of the State Fire Marshal

**Address:** 2251 Harvard Street, Suite 400

**City/State/Zip:** Sacramento, California 95815

**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  
48  
15  
4  
0

**TOTALS**

**94                      92**

**State Rating** ..... **97.9**

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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:

Reviewed the results of the Progress Report scoring summary spreadsheet, found no issues.

Reviewed the programs documentation of inspection days, and found no issues.

Total number of operators on attachment 1 does not match attachment 3 because some operators have inspection units of different commodities.

Reviewed staff training in PHMSA TQ - Blackboard - All OK

All regulations and ammendment shave been adopted. Civil penalties are set at \$200,000.00 and \$2,000,000.00

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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 |
|   | a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspections   |   |   |
|   | b. IMP Inspections (reviewing largest operator(s) plans annually)   |   |   |
|   | c. OQ Inspections   |   |   |
|   | d. Damage Prevention Inspections  |   |   |
|   | e. On-Site Operator Training  |   |   |
|   | f. Construction Inspections (annual efforts)  |   |   |

### Evaluator Notes:

Yes, written procedures were reviewed

Section 8 - Conducting Inspections - 8.9

Section 8 - Conducting Inspections - 8.23 & 8.24

Section 8 - Conducting Inspections - 8.12 & 8.13

Section 8 - Conducting Inspections - 8.22

Section 8 - Conducting Inspections - 8.21

They have this section which is training for New Operators. However, it notes it would work for any reason.

Section 8 - Conducting Inspections - 8.11

\*\* They don't have LNG jurisdiction

- |   |  |   |   |
|---|--|---|---|
| 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 |
|   | a. Length of time since last inspection  |   |   |
|   | b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)   |   |   |
|   | c. Type of activity being undertaken by operators (i.e. construction)  |   |   |
|   | d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.)   |   |   |
|   | 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)                           |   |   |
|   | f. Are inspection units broken down appropriately?   |   |   |

### Evaluator Notes:

a. Section 7.3 Time Intervals for Inspections. b. Section 7.3 Risk-based approach. Inspection History Section 7.4.1 Link to Activity Reports c, d & e. Section 7 f. Units apportioned appropriately.

- |   |  |   |   |
|---|--|---|---|
| 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 |
|   | a. Procedures to notify an operator (company officer) when a noncompliance is identified   |   |   |

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

Evaluator Notes:

Yes, written procedures were reviewed

Section 11 - Enforcement Program - 11.3

Section 11 - Enforcement Program - 11.10

Section 11 - Enforcement Program - 11.10

\* The CaSFM procedures call for inspectors to review previous compliance actions prior to conducting inspections to identify probable violations and issues from warning letters. However the procedures do not clearly state in post inspection activities how the condition of these PVs and issues is to be documented. The CaSFM could benefit from updating their procedures to clearly identify and document these issues.

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

Yes, written procedures were reviewed

Section 10 - Accident Investigation - 10.1

Section 10 - Accident Investigation - 10.1, 1-5

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

Evaluator Notes:

B3 - The CaSFM procedures call for inspectors to review previous compliance actions prior to conducting inspections to identify probable violations and issues from warning letters. However the procedures do not clearly state in post inspection activities how the condition of these PVs and issues is to be documented. The CaSFM could benefit from updating their procedures to clearly identify and document these issues.

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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:

They use a system of monitoring and qualifying inspectors by supervisors and final approval is by program manager before they are allowed to conduct inspections as a lead.

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- |   |  |   |   |
|---|--|---|---|
| 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:

The PM showed adequate knowledge of the the pipeline safety program and regulations.

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

Evaluator Notes:

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



**PART D - Program Performance****Points(MAX) Score**

- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | 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 <ol 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></ol> | 5 | 3 |
|----------|---|---|---|

**Evaluator Notes:**

Reviewed inspections completed in 2019 and found that some types of inspections are not meeting the time intervals established in the CaSFM written procedures. The CaSFM has created a tracker to help ensure that all operator types, units, and inspection types are completed within established time-frames. The program is aggressively working to get all types of inspections back on schedule and should be able to do so in the next couple years.

2-Points deducted for Needed improvement -

- |          |   |    |    |
|----------|---|----|----|
| <b>2</b> | 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 <ol 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></ol> | 10 | 10 |
|----------|---|----|----|

**Evaluator Notes:**

Yes, the program is using IA to conduct inspections. A sample review of the inspections showed that inspectors were keeping good notes and documenting evidence of probable violations.

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|----------|---|---|---|
| <b>3</b> | 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. 83.75 field days devoted to OQ inspections.  
Yes, they did 78.74 OQ inspection days in CY2019.

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|----------|--|---|---|
| <b>4</b> | 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 <ol style="list-style-type: none"><li>a. Are the state's largest operator(s) plans being reviewed annually?</li></ol> | 2 | 2 |
|----------|--|---|---|

**Evaluator Notes:**

Yes, they did 150.76 days LIMP inspection days in CY 2019.

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| 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|   | 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:

Yes, incident investigations for 2019 were reviewed and no issues were found.  
Incidents investigations are well documented.

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

Evaluator Notes:

yes, no issues

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|---|---|----|----|
| 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<br>Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
|   | 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:

Compliance actions were reviewed and found to be well documented. Letters were sent to Company Officers and managers. Inspections are reviewed by supervisors who decide what is a PV or a concern then those findings are reviewed by the supervisor group before actions are taken. The Program Manager reviews all PV action letters before signing.

State could improve the process by adding the amount of civil penalties that could be assessed if the operator does not achieve compliance.

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

Yes, Section 10 - Accident Investigation of their procedures  
 Yes, they were reviewed  
 Yes, the records and documents were reviewed and were sufficient.  
 Yes, records were in good order and complete.  
 No violations were identified in investigations.  
 Yes, they did respond to AID on any requests made.  
 Yes, the program shared information and lessons learned with all WR states at NAPSR WR Meetings.

- |          |   |   |   |
|----------|---|---|---|
| <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:**

Yes, letter was sent to Chairman on 6/18/2019 and the response was received back on 7/30/2019.

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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:**

Held on April 17-18, 2019 with TQ help -Wayne StGernain and Tom Finch from PHMSA Western Region.

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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, they have a state report that is required that has this question on it.

- |           |  |   |   |
|-----------|--|---|---|
| <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:**

Yes, the State Fire Marshall information is available on their public web site.

- |           |   |   |   |
|-----------|---|---|---|
| <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:**

Yes, reviewed the three SRCRs from DATA Mart and the actions taken from report to closing.

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

Yes, the PM provided verification of his responding to NAPSR surveys during CY2019.

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

Evaluator Notes:

The state had 2 waivers going into 2019 and has since had 1 operator change out the pipe being used under the waiver and the state has closed that one out.

Provided them the contact name and information for PHMSA to have them removed from the records.

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|-----------|--|-----------|-----------|
| <b>16</b> | Were pipeline program files well-organized and accessible? | Info Only | Info Only |
|           | Info Only = No Points                                      |           |           |
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Evaluator Notes:

Yes, the CaSFM has worked to to all electronic record keeping and the files are well organized.

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

Discussed the SICT numbers for 2020 and beyond and the importance of having good estimates of what can be completed by existing staff.

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|-----------|---|-----------|-----------|
| <b>18</b> | Discussion on State Program Performance Metrics found on Stakeholder Communication site.\ <a href="http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805">http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805</a> | Info Only | Info Only |
|           | Info Only = No Points   |           |           |
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Evaluator Notes:

Discussed the state metrics with the Program Manager.

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|-----------|--|-----------|-----------|
| <b>19</b> | Did the state encourage and promote operator implementation of Pipeline Safety 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 | Info Only |
|           | Info Only = No Points  |           |           |
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- a. <https://pipelinesms.org/>
  - b. Reference AGA recommendation to members May 20, 2019
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Evaluator Notes:

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- |           |                       |           |           |
|-----------|-----------------------|-----------|-----------|
| <b>20</b> | General Comments:     | Info Only | Info Only |
|           | Info Only = No Points |           |           |
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Evaluator Notes:

D-1, Reviewed inspections completed in 2019 and found that some types of inspections are not meeting the time intervals established in the CaSFM written procedures. The CaSFM has created a tracker to help ensure that all operator types, units,

and inspection types are completed within established time-frames. The program is aggressively working to get all types of inspections back on schedule and should be able to do so in the next couple years.

2-Points deducted for Needed improvement -

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Total points scored for this section: 48  
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:

Standard Comprehensive.

Yes, pipeline operator had representatives at inspection

- 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:

Inspection was conducted using IA

- 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:

A. Yes

B. Yes, the inspectors asked in-depth questions

C. Inspectors were reviewing the procedures in an office setting.

D. Inspectors made sure to establish understanding of the requirements in the CFR and get the appropriate responses.

- 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, both inspectors showed adequate knowledge of the pipeline safety program and regulations.

- 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:

Yes, the inspectors reviewed the days findings and what would be reviewed the next day.

- 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:

Inspectors reviewed the procedures for receiving shipments of product, welding and repair and emergency response.

7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

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**

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | 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:

The CaSFM has seen very few incidents or accidents on the HL pipelines it covers over the past many years. (0 - incidents in 2019 by excavation damage. They have worked with the CPUC to look at their damage stats in the past to get a better understanding of the trending taking place in California.

- |          |  |   |    |
|----------|--|---|----|
| <b>2</b> | 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:

- |          |   |   |    |
|----------|---|---|----|
| <b>3</b> | 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:

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | 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><li>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.</li><li>d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?</li></ol> | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

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**5**      General Comments:

Info Only = No Points

Info Only Info Only

Evaluator Notes:

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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:

N/A. Does not have a interstate agent agreement.

- 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:

N/A. Does not have a interstate agent agreement.

- 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:

N/A. Does not have a interstate agent agreement.

- 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:

N/A. Does not have a interstate agent agreement.

- 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:

N/A. Does not have a interstate agent agreement.

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

Evaluator Notes:

N/A. Does not have a interstate agent agreement.

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