



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

1200 New Jersey Avenue SE
Washington DC 20590

2019 Gas State Program Evaluation

for

MISSISSIPPI 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 Gas State Program Evaluation -- CY 2019

Gas

State Agency: Mississippi

Agency Status:

Date of Visit: 03/23/2020 - 07/07/2020

Agency Representative: Mr. Rickey Cotton, Director Pipeline Safety

PHMSA Representative: Mr. Agustin Lopez, State Evaluator

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

Name/Title: Dane Maxwell, Chairman

Agency: Mississippi Public Service Commission

Address: 501 N. West Street, Suite 201A

City/State/Zip: Jackson, MS 39201

Rating:

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

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.

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	0
15	15
10	9
50	49
15	15
4	4
0	0

TOTALS

94 92

State Rating **97.9**

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. Verified data with annual reports and found two municipality operators were missing. MSPSC verified that the two municipalities were taken over by private operators.
- b. There were 35 LNG inspection days submitted on Progress Report and there are no LNG operators in MS. Reviewed database tracking spreadsheet and found that the LNG Inspection days should've been Transmission inspection days. The MSPSC corrected the Progress Report and resubmitted data to FedStar.
- c. Verified operators with annual reports and there were several municipalities that did not submit annual reports. The MSPSC is working with the municipalities and will assure they submit annual reports.
- d. All reportable incidents were submitted in the Progress Report and investigated by the MSPSC.
- e. Verified compliance action data with MSPSC database/spreadsheet which tracks all compliance actions.
- f. The MSPSC lists all the records that are kept in their files.
- g. Verified the MSPSC qualified inspectors with Blackboard and found that Mr. Neil Wood was not qualified as an IMP inspector. He was missing one course, PL3359(CRM).
- h. The MSPSC has automatic adoption of regulations. Only issue is the civil penalty amount is not at the PHMSA required levels.
- i. The MSPSC has their planned performance listed in Attachment 10.

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
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none">a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspectionsb. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually)c. OQ Inspectionsd. Damage Prevention Inspectionse. On-Site Operator Trainingf. Construction Inspections (annual efforts)g. LNG Inspections | | |

Evaluator Notes:

Section 2.1 addresses inspection procedures which include pre and post inspection activities.

The MS PSC has current procedures but they are not state specific to their program. The procedures mirror the "State Guidelines" which are to generic for many of the procedures. The MS PSC needs to amend their procedures to be more specific to the way they operate the program. The MS PSC should use Appendix S of the "State Guidelines" as a reference.

- | | | | |
|---|---|---|---|
| 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
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| | <ul style="list-style-type: none">a. Length of time since last inspectionb. 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:

Section 2.1 of procedures includes inspection priorities of operators.

The MS PSC has current procedures but they are not state specific to their program. The procedures mirror the "State Guidelines" which are to generic for many of the procedures. The MS PSC needs to amend their procedures to be more specific to the way they operate the program. The MS PSC should use Appendix S of the "State Guidelines" as a reference.

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|---|---|---|---|
| 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
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
| | <ul style="list-style-type: none">a. Procedures to notify an operator (company officer) when a noncompliance is identifiedb. Procedures to routinely review progress of compliance actions to prevent delays or breakdownsc. Procedures regarding closing outstanding probable violations | | |

Evaluator Notes:

Section 2.1(5) and (6) include compliance procedures which address steps to take from the discovery to the resolution of a probable violation.

The MS PSC has current procedures but they are not state specific to their program. The procedures mirror the "State Guidelines" which are to generic for many of the procedures. The MS PSC needs to amend their procedures to be more specific to the way they operate the program. The MS PSC should use Appendix S of the "State Guidelines" as a reference.

- 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:

Section 3.3(IV) has mechanism for receiving and responding to incidents. The MS PSC gathers enough information if no onsite is made, but do investigate all reportable incidents.

The MS PSC has current procedures but they are not state specific to their program. The procedures mirror the "State Guidelines" which are too generic for many of the procedures. The MS PSC needs to amend their procedures to be more specific to the way they operate the program. The MS PSC should use Appendix S of the "State Guidelines" as a reference.

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

Evaluator Notes:

The MS PSC has current procedures but they are not state specific to their program. The procedures mirror the "State Guidelines" which are too generic for many of the procedures. The MS PSC needs to amend their procedures to be more specific to the way they operate the program. The MS PSC should use Appendix S of the "State Guidelines" as a reference.

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
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 4 |
| | <ul style="list-style-type: none">a. Completion of Required OQ Training before conducting inspection as leadb. Completion of Required DIMP/IMP Training before conducting inspection as leadc. Completion of Required LNG Training before conducting inspection as leadd. Root Cause Training by at least one inspector/program managere. Note any outside training completedf. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1) | | |

Evaluator Notes:

- a. Yes the MS PSC inspectors are qualified as lead to conduct OQ inspections.
- b. Mr. Neil Wood was the only inspector leading IMP inspections but was not qualified to led IMP inspections. He was missing course PL3359(CRM). Mr. Wood retired in 2019.
- c. There are no LNG facilities in MS.
- d. Yes MS PSC inspectors have completed the Root Cause training.
- e. no outside training in 2019.
- f. There are no IMP qualified inspectors. Mr. Thompson is registered for the CRM course in 2020 so he will be qualified to lead IMP inspections.

- | | | | |
|---|--|---|---|
| 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
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|---|--|---|---|

Evaluator Notes:

Yes, Mr. Rickey Cotton is very knowledgeable of the pipeline safety program and regulations.

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| 3 | General Comments:
Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

C1.b. Mr. Neil Wood was the only inspector leading IMP inspections but was not qualified to led IMP inspections. He was missing course PL3359(CRM). Mr. Wood retired in 2019.

Total points scored for this section: 9
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
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. Construction (did state achieve 20% of total inspection person-days?)g. OQ (see Question 3 for additional requirements)h. IMP/DIMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Yes, reviewed state data to verify inspections are being conducted per their procedures, which is every 5 years. Seems that all inspections are being conducted at least every 5 years. Also reviewed several inspection reports to verify dates of inspections. There are several operators without inspections in the last 5 years which turned out to be newer operators which the MS is working on to complete required inspections.

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| 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?
Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 9 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. Constructiong. OQ (see Question 3 for additional requirements)h. IMP/DIMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

MS PSC utilizes the PHMSA Forms to document their inspections. Reviewed randomly selected inspections to assure forms are being utilized and fully completed. The MS PSC need to be consistent in filling out forms. Some had an "X" under "SAT" and others had "SAT" written on the notes section. The inspectors should be following state procedures to assure forms are completed consistently.

There was an inspection report which had "U" marked for a question on the form, Clairborne Natural Gas 2019 Comp, which there were no notes or probable violations issued. This is most likely due to utilizing a previous form and not deleting the "U"s. Reviewed past years inspection and there were some with same issue. The MS PSC needs to assure that all "U" on inspection forms are being addressed either with notes or compliance actions. There was a one point deducted for this issue.

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

Evaluator Notes:

The MS PSC is conducting OQ inspections of operator OQ programs per their procedures. Reviewed OQ inspection reports to verify OQ Programs are being reviewed. Verified that OQ Programs are being reviewed within the inspection cycle of every 5 years.

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| 4 | Is state verifying operator's integrity management Programs (IMP and DIMP)? 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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| | <ul style="list-style-type: none"> a. Are the state's largest operator(s) plans being reviewed annually? b. Are states verifying with operators any plastic pipe and components that have shown a record of defects/leaks and mitigating those through DIMP plan? c. Are the states verifying operators are including low pressure distribution systems in their threat analysis? | | |

Evaluator Notes:

Yes, reviewed randomly selected DIMP and IMP inspections which are conducted by the MS PSC. Verified that DIMP and IMP inspections are being conducted per the inspection cycles, which is every 5 years.

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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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| | <ul style="list-style-type: none"> a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken; b. Operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance); c. Operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21; d. 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; e. 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; f. Operator procedures for considering low pressure distribution systems in threat analysis? g. Operator compliance with state and federal regulations for regulators located inside buildings? | | |

Evaluator Notes:

- A. this is in the Standard inspection form under section 605(b)(2) 192.459.
- B. This is in the DIMP plan.
- C. This is in the Standard inspection form under section 605(b)(1) 192.615(a)(7).
- D. This is in the Standard inspection form under section 605(b)(1) 192.615 (b) (3).
- E.-G. are not included in the inspection forms. The MS PSC needs to assure the questions are being verified with operators. The MS PSC needs to record or document that the questions are being verified.

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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)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Discuss ADBs during conferences and meetings. Municipalities and Master Meter operators are required to have continuing education so most attend the meetings and conferences.

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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
Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
| | <ul style="list-style-type: none"> 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, reviewed randomly selected inspection reports and all were addressed to company/government officials.
- b. Yes, probable violations were documented properly in the report and compliance letters.
- c. Yes, reviewed compliance actions and all were resolved in a timely manner.
- d. Yes, the MS PSC periodically review compliance actions to assure they are being closed and followed up on.
- e. There was an inspection report with a "U" marked with no compliance action issued. This was due to the inspector utilizing a previous form and not clearing the "U's". There was no actual violation of the regulations. Issue is addressed in Question 2.
- f. Yes, the MS PSC has issued Civil Penalties.
- g. Yes, the Program Manager reviews and signs all correspondence sent to operators.
- h. Yes, the MS PSC give due process to all parties.
- i. Yes, the post inspection exit briefing is documented on every inspection form.
- j. Yes, the MS PSC sent out all compliance actions to operators within 90 days of completing the inspection.

8	(Incident Investigations) Were all incidents investigated, thoroughly documented, with conclusions and recommendations?	10	10
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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, the MS PSC has a mechanism to receive and respond to incident notifications. Every operator is given instructions on reporting incidents and provided with contact information. Also the information is available on their website.
- b. Yes, there were two reportable incidents that were investigated by the MS PSC.
- c. All reportable incidents were investigated.
- d. Yes, observations were documented in the Investigation Reports.
- e. Yes, contributing factors were documented in the Investigation Reports.
- f. Yes, the MS PSC had recommendations to prevent re-occurrence of the incidents.
- g. There were no compliance actions sent but the operators did perform re-training due to incident. The MS PSC received records to assure the operator did re-train their employees.
- h. The MS PSC is always in contact with the Region and AID to assist with any incidents.
- i. Yes, the MS PSC shares lessons learned during seminars and NAPSR Regional meetings.

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| 9 | 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
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, the MS PSC responded within 60 days of receiving the Chairman letter. Letter sent on June 7, 2019 and response received on July 2, 2019. In last year's letter there was point deductions due to not having adequate IMP and OQ procedures. The MSPSC amended their procedures to include IMP and OQ Procedures.

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

Evaluator Notes:

Yes, the last seminar was conducted on September 2019.

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

Evaluator Notes:

Yes, the MS PSC verify NPMS changes during inspections. Question is part of the inspection form.

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| 12 | 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).
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

Yes, communicate to stakeholders thru website which has pipeline safety information enforcement cases are available if requested. Also participate in 811 Summit every year and MS Gas Association Seminars.

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|-----------|---|---|---|
| 13 | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, the MS PSC followed up on one SRCR. Received correspondence from operator stating pipeline was abandoned and a new 5 foot section was directionally bored to replace the section.

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| 14 | Was the State responsive to:
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? | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

A. Yes, Mr. Rickey Cotton responds to NAPS and PHMSA surveys and requests.
B. There are no IMP notifications.
C. MS PSC has one open SRCR in WMS with no follow up. MS PSC has been having trouble getting into WMS to update SRCR's.

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| 15 | 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.
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

There is a waiver issued in 2009 to Atmos. The pipeline section was never put in service and has been abandoned.

16 Were pipeline program files well-organized and accessible?

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Yes, the MS PSC provided all material very easily. The files are kept electronically and are very organized and protected.

17 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

Evaluator Notes:

There are no issues or concerned with the SICT inspector days. The MS PSC does not foresee any issues to meet the inspection days. This will also depend on the covid situation in the future.

18 Discussion on State Program Performance Metrics found on Stakeholder Communication site.\ <http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805>

Info Only = No Points

Evaluator Notes:

Damages per 1,000 tickets is in downward trend(good). Inspection activity is in upward trend(good). Total leaks are down this year (good).New DP law has improved the number of TP hits. More construction inspections are being performed so operators are more vigilant during excavation activities.. Operators are replacing large amounts of vintage pipe so leak numbers are going down.

19 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

a. <https://pipelinesms.org/>

b. Reference AGA recommendation to members May 20, 2019

Evaluator Notes:

The MS PSC discuss the implementation of PSMS during seminars and conferences with operators.

20 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

D.2. There was an inspection report which had "U" marked for some questions on the form, Clairborne Natural Gas 2019 Comp, which there were no notes or probable violations issued. This is most likely due to utilizing a previous form and not deleting the "U"s. Reviewed past years inspection and there were some with same issue. The MS PSC needs to assure that all "U" on inspection forms are being addressed either with notes or compliance actions. There was a one point deduction for this issue.

Total points scored for this section: 49
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:

City of Vicksburg

Ms. Joyce Beal

July 7, 2020

Evaluator: Agustin Lopez

Due to the pandemic, the evaluation was conducted virtually through ZOOM. I evaluated Ms. Beal while she reviewed procedures and records of the City of Vicksburg.

- Comprehensive Inspection which includes procedures and records.
- February 6, 2019
- Yes, operator representative was present
- Yes, Ms. Joyce Beal has not been evaluated in the recent past.

- 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, Ms. Beal utilized the Federal Inspection form during her inspection.

- 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:

- Reviewed procedures thoroughly.
- Reviewed procedures.
- Inspection was evaluated remotely via ZOOM so only evaluated inspector review procedures and records.
- No other activities.
- Yes, the inspection was the adequate length of time.

- 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, Ms. Beal displayed knowledge of the pipeline safety program and regulations. She's been with the PSC for about 3 years and she demonstrate good knowledge of pipeline safety.

- 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 inspector conducted an exit interview after reviewing the O&M Procedures and records. She discussed issues found during the evaluation with the operator. Issues discussed included: 192.16 for no procedure to notify customer of service line not being maintained by the operator; 192.615 O&M does not indicate a copy of emergency plan will be furnished to supervisors; 192.465 not taking prompt remedial action; 192.605 no providing documentation of periodically reviewing work done by personnel to determine effectiveness; 192.615 no documentation for training personnel to assure they are knowledgeable of the emergency procedures.

- 6 Was inspection performed in a safe, positive, and constructive manner ? Info Only Info Only
Info Only = No Points
- a. 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, the inspector practiced social distancing and wore a mask. The field portion of the inspection was not evaluated due to the ongoing pandemic.

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

Evaluator Notes:

Ms. Joyce Beal has been with the MS PSC since 2017 and displays excellent knowledge of the pipeline safety rules and regulations.

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.
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

Yes, discussed with Mr. Rickey Cotton and Annual Reports are reviewed for accuracy and used to prioritize inspections based on information on Annual Reports. Unaccounted gas is big trigger as well as new/removed services. Incidents are reviewed during inspections and as part of a pre-inspection activity.

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| 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)
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)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | NA |
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Evaluator Notes:

Discussed with Mr. Rickey Cotton and data has been reviewed by the MS PSC. The MS PSC has reached out to operators with issues to find ways to improve. Will try to meet with operators quarterly to review data and any actions take to improve data.

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

Reviewed data with Mr. Rickey Cotton to try to find ways to verify and improve the data. Have reached out to operators and will try to meet on a quarterly basis to analyze data.

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| 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?
Yes = 2 No = 0 Needs Improvement = 1 <ol style="list-style-type: none">a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages?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. | 2 | 2 |
|----------|--|---|---|

- d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?

Evaluator Notes:

Review data provided in PRIMIS and State Performance Metrics. Meet with operators to discuss damages and have also improved the Damage Prevention law to help improve(lower) the damages.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The MS PSC is mainly complying with Part F of the Evaluation.

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 the MS PSC is not an Interstate Agent nor has a 60106 Certification.

- 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 the MS PSC is not an Interstate Agent nor has a 60106 Certification.

- 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 the MS PSC is not an Interstate Agent nor has a 60106 Certification.

- 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 the MS PSC is not an Interstate Agent nor has a 60106 Certification.

- 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 the MS PSC is not an Interstate Agent nor has a 60106 Certification.

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

Evaluator Notes:

N/A the MS PSC is not an Interstate Agent nor has a 60106 Certification.

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