



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

PENNSYLVANIA PUBLIC UTILITY 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:** Pennsylvania

**Agency Status:**

**Date of Visit:** 05/05/2020 - 05/07/2020

**Agency Representative:** Robert Horensky, Fixed Utility Valuation Manager; David Kline, Fixed Utility Valuation Engineer Supervisor; Sunil Patel, Fixed Utility Valuation Engineer III, Jim Harchar, Fixed Utility Valuation Engineer

**PHMSA Representative:** David Lykken, Transportation Specialist

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

**Name/Title:** Ms. Gladys Brown Duntrieuille, Chairman

**Agency:** Pennsylvania Public Utilities Commission

**Address:** 400 North Street

**City/State/Zip:** Harrisburg, PA 17120

**Rating:**

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

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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**

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

**Possible Points    Points Scored**

0                      0  
15                    15  
10                    10  
50                    50  
15                    15  
4                      4  
0                      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-c. No issues
- d. No NRC required reportables in 2019
- e -I. No issues

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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:

a. Standard inspection procedures located in the Pennsylvania Public Utility Commission Gas Safety Inspector Handbook (Rev 2/2020) on page 11. Inspection protocols are listed on page 15. Pre and Post inspection instructions addressed on page 13 outline steps for all inspections completed by the Division. b. IMP inspection procedures beginning on page 28. c. OQ inspection procedures on page 33. d. Damage Prevention inspection procedures page 15 & 32. e. Operator Training inspection activities procedures page 9 f. Construction Inspections beginning on page 20. Steel pipe construction is found on page 33. PAPEI on page 36. Also page 51 Physical Activities under Work Environment section.

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

Length of time between inspections not to exceed five years. Inspection plan schedule for operators and inspection units is consistent with the priorities described in the procedures (Attachment 4). Four methods used. 1) Risk formula 2) length of time since last 3) Construction workload 4) Staff analyst review of inspection data requested and collected from operators (Annual FL-XX letter).

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

Procedures for closing out outstanding PV's under Inspection and Enforcement Program beginning on Page 42. Enforcement Procedures starting on page 45. Notification to company official noted on Page 46. Routine review of progress of compliance actions covered under Non-Compliance Follow Up Procedures, Page 31 and Page 44 (Documentation).

- |   |  |   |   |
|---|--|---|---|
| 4 | (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident?<br>Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
|---|--|---|---|

- 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. Page 23 - Non Reportable Failure Investigation, Facility Damage page 26, Reportable Failure Investigations page 36. Pipeline operators contact the regional PA-PUC supervisor or default to one of the inspection staff assigned to that area to report incidents. All operators have PA PUC staff contact information. Process appears to work satisfactory. Program Manager is familiar and understands the MOU between the NTSB and PHMSA (Attachment 2) and Federal/State cooperation in case of incidents (Attachment 3).

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**5** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The PAPUC Pipeline Safety Handbook contains baseline procedures as required for conducting it pipeline safety inspection and enforcement program.

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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:

Yes. No issues noted. a. Inspectors have completed the PL-3622 OQ training necessary for conducting OQ inspections. b. Inspection staff who have conducted IM inspections as lead have completed all necessary T&Q training. c. 13 inspectors including PM have completed Root Cause training. e. lead inspectors have met minimum qualifications for leading Std insps. PM has completed all required courses.

- |   |  |   |   |
|---|--|---|---|
| 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. New PM has been with the safety program since 2013. Is familiar with PHMSA programs and regulations.

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

Evaluator Notes:

No issues.

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:

The program entered into a HL 60105 agreement in 2018. Not all jurisdictional operators have been inspected. Time intervals have not been exceeded at this time.

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

The program utilizes a program specific checklist and corresponding PHMSA HL form as a supplement where needed.

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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:

The program entered into a HL 60105 agreement in 2018. Not all jurisdictional operators have been inspected. Time intervals have not been exceeded for conducting OQ inspections.

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

The program entered into a HL 60105 agreement in 2018. Both IMP plan and IMP verification inspections have been conducted.

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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. Mass Data request letter FL-1-19 sent out at the beginning of the year. 32 data points requested from operators covering NTSB, PHMSA, and State recommendations, advisories, and other areas of emphasis. Operators submit data electronically via the PUC's web site. Submissions reviewed, tabulated, and incorporated into the programs risk model. Items a thru e also covered in relevant inspection checklists.

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

Evaluator Notes:

Yes. As noted under D.5. Reviews annual FL-1-XX letter submissions and via applicable inspection checklists.

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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 | 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:

One compliance letter sent in CY2019. Sent to appropriate company official within 60 days of inspection. PV's properly documented and match numbers in Attachment 8 of Progress Report. Letter references state statute "ATC 127" which details enforcement actions/fines provisions.

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- |   |   |    |    |
|---|---|----|----|
| 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. Pipeline operators contact the regional PA-PUC supervisor or default to one of the inspection staff assigned to that area to report incidents. All operators have PA PUC staff contact information. b thru g. No jurisdictional reportable incidents in CY2019 c, d & e. Reports are typically detailed in nature. f & g. Yes, When applicable. h. The program maintains communications with PHMSA AID and Eastern Region office during reportable events. I. Yes, during seminars and annual NAPSRS 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. State Programs letter went out on 6/7/19. Chair's response received on 7/19/2019. Concerns expressed on PR scoring deductions related to facility jurisdiction authority and field inspection day requirement. Both have been rectified. Issue with inspector field performance rectified.

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

Annual seminars conducted. Reviewed agenda for CY2019 seminar.

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

Mass Data request letter FL-1-19 at the beginning of the year. Also addressed in inspection checklists.

- |           |  |   |   |
|-----------|--|---|---|
| <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. As noted in prior evaluations. Meetings held with operators semi-annually. A public documents page is provided on the PA-PUC web site to search for enforcement case information.

- |           |   |   |   |
|-----------|---|---|---|
| <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. 2 SRC's reported in CY2019. None related to HL. Both updated and closed out utilizing the WMS.

- |           |   |   |   |
|-----------|---|---|---|
| <b>14</b> | Was the State responsive to:<br>Yes = 1 No = 0 Needs Improvement = .5 <ul style="list-style-type: none"> <li>a. Surveys or information requests from NAPSRS or PHMSA;</li> <li>b. Operator IM notifications; and</li> <li>c. PHMSA Work Management system tasks?</li> </ul> | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes. No issues noted.

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

Evaluator Notes:

No waivers related to HL issued in CY2019.

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

Evaluator Notes:

Yes. No issues. Program evaluation conducted remotely. Document were provided in a timely manner. Program has a robust database for accessing needed information.

- 
- 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:

Discussed shortfalls in not meeting inspection intervals on the gas side. Program to re-evaluate needs and update SICT as necessary. Program did hire five inspectors in CY2019. May hire four additional if approved but currently under a hiring freeze.

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- 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:

Yes. Discussed performance metrics. The PA-PUC metrics appeared to be at reasonable performance levels. Excavation damages per 1000 tickets (requested) ticked down slightly from 2018 still averaging approximately 2.2 damages in CY2019. Inspection days per 1000 miles significantly up from CY2018 (14 days) averaging approximately 19.5 days in CY2019. Inspector Qualification core training at almost 80%. 5 year retention percentage dropped below 50% due to hiring of new inspection staff. Number of total leaks eliminated/repaired averaging 280 for CY2019.

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- 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:

Yes. Discussed as part of operator seminars.

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

Evaluator Notes:

No point deductions. No issues identified.

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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:

A standard inspection of the MIPC LLC 6" HVL pipeline conducted remotely via GoToMeeting and telephone. The operator was represented via webcast and telephone. The lead inspector has been with the safety program since 2013.

- 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. PHMSA Form 3 Rev 1/2020 (Baseline Records) was used for this 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:

Yes. Inspectors had reviewed and had available procedures for field activities of which records were reviewed during GoToMeeting sessions. Several issues identified during inspection. Calibration records for instruments where notated on maintenance records were reviewed. Inspections were of reasonable length.

- 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. Inspectors demonstrated adequate knowledge.

- 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:

Final exit has not been conducted. The inspector did review with the operator identified concerns during the records review. Establishing MOP - Final confirmation of MOP record(s) for ANSI 300 block valves; ROW patrolling regarding line markers; and Atmospheric Corrosion monitoring. Inspector will be requesting further records and perform field verification at facility site.

- 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:

As previously noted the inspection was conducted remotely via GoToMeeting and telephone. Field verification to follow when current local COVID-19 restriction are lifted. This inspection was well organized the inspectors conducted themselves in a courteous and professional manner.

7 General Comments:  
Info Only = No Points

Info Only Info Only

Evaluator Notes:

No issues noted. Zero point deductions.

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. Operator's annual reports and results recorded into the risk assessment spreadsheet.

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

N/A. New question. No points scored for this evaluation period. Discussed with PM the 3/5/20 email from D. Appelbaum highlighting the need to dive deeper into operator annual report submittals related to excavation safety practices and the need to hold operators accountable.

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

N/A. New question. No point scored for this evaluation year. Discussed with PM the 3/5/20 email from D. Appelbaum highlighting the need to dive deeper into operator annual report submittals related to excavation safety practices and the need to hold operators accountable.

- |   |   |   |   |
|---|---|---|---|
| 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><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:

Yes, The program issues a letter to all operators in the first quarter of each year. The letter (FL 1-18) lists this question. Excavation damages per 1000 tickets (requested) which have trended slightly upward since 2013 topping out at 2.4 damages in 2016 now averaging approximately 2.1 damages in CY2019.

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**5** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Yes, The program issues a letter to all operators in the first quarter of each year. The letter (FL 1-19) lists this question. Excavation damages per 1000 tickets (requested) which have trended slightly upward since 2010 is now averaging approximately 2.1 - 2.2 damages between since CY2017.

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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.

- 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.

- 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.

- 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.

- 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.

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

Evaluator Notes:

N/A. Does not have a interstate agent.

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