



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

1200 New Jersey Avenue SE
Washington DC 20590

2020 Hazardous Liquid State Program Evaluation

for

Minnesota Office of Pipeline Safety

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



2020 Hazardous Liquid State Program Evaluation -- CY 2020
Hazardous Liquid

State Agency: Minnesota

Agency Status:

Date of Visit: 08/04/2021 - 08/11/2021

Agency Representative: Jonathan Wolfgram

PHMSA Representative: Joe Subsits, Rex Evans

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

Name/Title: Commissioner Harrington, Commissioner

Agency: Minnesota Office of Pipeline Safety

Address: 445 Minnesota Street, Suite 1000

City/State/Zip: ST. Paul, MN 55101

Rating:

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

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 2020 (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
15
10
50
15
6
0

0
15
10
50
15
6
0

TOTALS

96 96

State Rating

100.0

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- 1 Were the following Progress Report Items accurate? (*items not scored on progress report) 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:

No issues regarding progress report accuracy were determined. A substantial portion of data is managed through the Sales Force data base that Minnesota uses to help manage their work.

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. IMP Inspectionsc. OQ Inspectionsd. Damage Prevention Inspectionse. On-Site Operator Trainingf. Construction Inspections (annual efforts) | | |

Evaluator Notes:

Pre and Post inspection procedures are found in Section 5.1 Of Minnesota's Operating Guidelines Manual. Pre and post procedures for standard inspections are found in Section 5.2.1, 5.2.7 for control room inspections, 5.2.8 for public awareness inspections and section 5.2.9 for drug and alcohol inspections. Integrity management inspection procedures are found in Section 5.2.3. Operator qualification procedures are found in Section 5.2.4. Procedures for damage prevention inspections are found in section 5.2.6. Training procedures are found in Section 5.2.3 and Construction inspections are found in Section 5.2.2

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| 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:

Inspection prioritization procedures are found in Section 12.1. Minnesota's risk model considers length of time since last inspection, operating history of operator, location of unit being inspected, high consequence are a identification process and identification of high risk units.

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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:

Procedures to notify operators of probable violations are found in Section 5.3.1(1). The operator is notified of violations by exit interviews and in writing. Compliance follow up activities are found in Section 5.3.1(2) & (3). Key compliance dates are tracked in Salesforce. Compliance cases are not closed until follow up items are corrected. Procedures on managing outstanding violations are found in Section 5.26.

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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?
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:

Section 11.8 addresses incident notifications. This section requires 24 hour notification of pipeline accidents to the Minnesota Office of Pipeline Safety. This is managed through Minnesota's duty officer. Section 11.9 addresses coordination with the Minnesota Emergency Operations Center. Section 6 and 6.1 address the need to collect information required to assure compliance with the pipeline safety code and to prevent the possibility of incident reoccurrences.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Minnesota procedures address compliance and incident response issues.

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



PART C - State Qualifications

Points(MAX) Score

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|---|--|---|---|
| 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 | 5 |
| | <ul style="list-style-type: none">a. Completion of Required OQ Training before conducting inspection as leadb. Completion of Required IMP Training before conducting inspection as leadc. Root Cause Training by at least one inspector/program managerd. Note any outside training completede. 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:

Most inspectors are qualified to perform hazardous Liquid, Operator Qualification and Hazardous liquid IMP inspections. Tricia Monbriand was not fully qualified as a liquids inspector. She was not listed on Minnesota's progress report. Jon eventually puts all his inspectors through root cause training. Jon tries to bring in additional training annually. The last class brought in was a design class. Jon usually tries to invite other States to the training session.

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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
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
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Evaluator Notes:

Jon is qualified to to perform all gas and liquid inspections. He has been with the Minnesota Office of Pipeline Safety for 13 years. He has a solid grasp of state and general pipeline safety issues.

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| 3 | General Comments:
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

Minnesota is well staffed and qualified to implement the States pipeline Safety program.

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



PART D - Program Performance

Points(MAX) Score

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|---|--|---|---|
| 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. Construction (did state achieve 20% of total inspection person-days?)f. OQ (see Question 3 for additional requirements)g. IMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

All operators receive a standard inspection annually. Other inspections were spot checked and found to be within the appropriate frequency. All operators receive a standard inspection annually. Other inspections were spot checked and found to be within the appropriate frequency. Inspection planning tools are found in Sales Force. Dates in Sales Force are auto populated including the next inspection date. Each inspector is assigned operators, they are responsible for completing due inspections as specified in Sales Force and the work plan is reviewed with the inspectors supervisor.

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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 | 10 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Constructionf. OQ (see Question 3 for additional requirements)g. IMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Minnesota uses IA for all inspections except the LPG systems. Several IA inspections were reviewed and found to be complete.

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| 3 | Is state verifying monitoring (Protocol 9/Form15) of operators OQ programs? 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 |
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Evaluator Notes:

Operator qualifications are tracked through Sales Force. Inspections required in Sales Force were matched with the Inspection Assistant in a satisfactory manner.

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| 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
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 to ensure they are completing the full cycle of the DIMP/IMP process? | | |

Evaluator Notes:

A specialized Integrity Management inspection is performed for the largest operators to review the updates associated with integrity management programs.

- 5 Did the state review the following (these items are NTSB recommendations to PHMSA that have been deemed acceptable response based on PHMSA reviewing these items during the evaluation process): Chapter 5.1 2 2
 Yes = 2 No = 0 Needs Improvement = 1
- Operator records of previous accidents and failures including reported third-party damage and leak response to ensure appropriate operator response as required by 195.402; and
 - 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:

The state may issue requests for information to determine the extent of issues addressed in an NTSB recommendation. NTSB recommendations are addressed in advisory bulletins. Advisory bulletins are forwarded to operators electronically in a year end news letter. The Federal advisory bulletin is hyperlinked to the the State advisory bulletin. The directional boring advisory bulletin is addressed in Inspection Assistant considerations.

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

Evaluator Notes:

The State issues a year end newsletter which lists the advisory bulletins for the past year. The federal advisory bulletin in hyperlinked in the state newsletter. The newsletter is sent electronically to all operators.

- 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
- Were compliance actions sent to company officer or manager/board member if municipal/government system?
 - Were probable violations documented properly?
 - Resolve probable violations
 - Routinely review progress of probable violations
 - Did state issue compliance actions for all probable violations discovered?
 - Can state demonstrate fining authority for pipeline safety violations?
 - Does Program Manager review, approve and monitor all compliance actions? (note: Program Manager or Senior Official should sign any NOPV or related enforcement action)
 - Did state compliance actions give reasonable due process to all parties? Including "show cause" hearing, if necessary.
 - Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns
 - 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:

Inspection reports were reviewed for 20 % of the operators. Compliance documentation appeared timely and appropriate. Compliance actions were made on all noted probable violations. Compliance actions and follow up are monitored in the Sales Force data base. All compliance issues were closed appropriately.

- 8 (Accident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations? 10 10
 Yes = 10 No = 0 Needs Improvement = 1-9
- Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports?
 - Did state keep adequate records of Incident/Accident notifications received?
 - 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?
 - 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:

There were no Federally reportable incidents in Minnesota for the 2020 year. Procedures were reviewed and found to be satisfactory.

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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:

Last years 10/23/20 letter to John Harrington did not require a Commission response.

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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 |
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Evaluator Notes:

A pipeline safety seminar is conducted every year. Last year the seminar was conducted virtually on 4/14/2020. The seminar is for liquid and gas operators. The seminar includes three concurrent sessions.

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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 |
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Evaluator Notes:

The NPMS data base issue is handled in the Inspection Assistant.

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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 |
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Evaluator Notes:

There is a stakeholder web page which has forms, alert notices, conference information. E-mail blasts are done as needed. Also there is a holiday mailing which include advisory bulletins and year end information.

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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:

There were no Safety related conditions for liquid operators in 2020. PHMSA records validate this.

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

Evaluator Notes:

NAPSRS surveys are filled out by Jon. Jon Has regularly filled NAPSRS survey requests. IM notifications and WMS are performed regularly.

- 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:

There were no waivers for liquid operators. This is validated on PHMSA's web site.

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

Evaluator Notes:

Files are managed electronically.

- 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:

2020 Liquid SICT days were 12. The state actually had 248 days.

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

Evaluator Notes:

Hazardous liquid inspection days per 1000 miles show slight increase from 2016. Hazardous Liquid inspector qualification lines are trending upward with a 2020 drop in core training and additional training. PHMSA enforcement and investigation review have consistently been maxed out.

- 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:

Safety Management Systems has been added to compliance orders. There has also been Safety Management System presentations at Minnesota's Pipeline Safety Seminar.

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

Evaluator Notes:

Minnesota has done a solid job managing its pipeline safety program. 20% of Minnesota's inspection reports have been reviewed. Documentation and correspondence was in order.

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:

we observed inspector Jeff Blackwell from Minnesota Office of Pipeline Safety. Jeff inspected the Enbridge construction project near Duluth. Company compliance personnel and Company inspectors were available during the inspections. During the visit Jeff looked at the coating of a joint, welding and inspection of a weld. Jeff has been an inspector for 11 years.

- 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:

Jeff used Inspection Assistant as the form for the inspection. Jeff used an IPAD to document inspection work. A hard copy of the form is available for the inspector to use.

- 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:

Jeff referred to coating procedures prior the coating application taking place. Calibration records for the jeeeping tool were checked. Jeff witnessed the entire coating application process including line jeeeping. He also observed welding and the inspection of the welds. Jeff observed the all key joining processes during our visit.

- 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:

Jeff appeared knowledgeable of pipeline construction processes. He asked good follow up questions and was engaged in his work. Jeff also asked about and confirmed proper temperatures required for coating application.

- 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:

Jeff was still performing his inspection after we left the site. He was aware of and confirmed that an exit interview would be conducted.

- 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:

Jeff worked in a safe manner. He wore the proper PE and was aware of the environment. Jeff checked procedures, validated procedures, and checked calibration records. He interview construction personnel and asked good follow up questions. He had a good understanding of the overall work being done by the operator and targeted the most important activities for evaluation.

7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Jeff was aware of the major activities being performed by the operator for the day. He planned his inspection work to ensure the most important activities for the day were being inspected. He worked well with the operator and performed a solid inspection.

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**

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

Annual reports are reviewed and managed through a sales force task. Annual report accuracy and trending are performed during the review. Trending is also reviewed based on incident reporting. Damage prevention audits are also done. A specialized form is used for this audit.

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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 | 2 |
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Evaluator Notes:

Damage prevention audits are performed. Verification that evaluation of excavation damage is addressed during third party damage investigations. This issue is addressed in the incident checklist.

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|---|---|-----------|-----------|
| 3 | Has the state reviewed the operator's annual report pertaining to Part D - Excavation Damage?
Info Only = No Points <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.)? | Info Only | Info Only |
|---|---|-----------|-----------|

Evaluator Notes:

Detailed analysis is found during quarterly damage prevention reporting.

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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.d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages? | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Data is evaluated during the damage prevention review.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Minnesota does a damage prevention review that is tracked in Sales Force. Damage prevention data is evaluated during that process.

Total points scored for this section: 6
Total possible points for this section: 6



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:

Inspection Assistant is used for documenting all interstate inspections.

- 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:

For non-team inspections, state guidelines require that PHMSA be notified within 60 days of the exit interview Central Regional office reports no issues with this requirement.

- 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:

For non-team inspections, state guidelines require immediate notification to PHMSA is required of conditions that pose an immediate hazard to the public or environment. Guidelines are accessible to state inspectors. No such condition occurred during the previous year.

- 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:

State activities are coordinated with PHMSA . Central Regional Office reports no issues with Minnesota's handling of interstate operators.

- 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:

There were no interstate Liquid incidents for 2020 in Minnesota.

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

Evaluator Notes:

Central Regional Office was contacted to determine if there were any issues with Minnesota's handling of interstate operators. There were no issues identified by Central Regional Office.

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