



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

1200 New Jersey Avenue SE  
Washington DC 20590

## 2020 Gas State Program Evaluation

for

OREGON PUC

### 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 Gas State Program Evaluation -- CY 2020

Gas

**State Agency:** Oregon

**Agency Status:**

**Date of Visit:** 07/13/2021 - 07/15/2021

**Agency Representative:** Kevin Hennessy, Chief Pipeline Safety  
Cody R. Cox, Senior Pipeline Safety Analyst

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

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

**Name/Title:** Megan Decker, Chair

**Agency:** Oregon Public Utility Commission

**Address:** 201 High Street SE, Suite 100

**City/State/Zip:** Salem, OR 97301-3398

**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 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  
10  
0

0  
15  
10  
50  
15  
10  
0

### TOTALS

**100 100**

**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:

- a. Jurisdictional authority, number of operators and units inspected were found and verified via PHMSA Portal. No issues.
- b. Number of inspection person days were 500 and exceeds the minimum requirement SICT number of 399. Construction days 83.5 meets the 20% requirement level.
- c. Verification via PHMSA Portal confirm operators match attachment 1 & 3. No issues.
- d. One incident reported for CY2020. The incident match the number in PHMSA Portal. This incident was largely related to the forest fire that affected many homes in the Avista Utilities service area.
- e. Number of carryover violations is 26 and previous year number was incorrectly reported as 16. No compliance action was taken nor civil penalties assessed in CY2020.
- f. Due to evaluation being performing remotely unable to verify records kept at the office location.
- g. Reviewed TQ training records and verified 4 inspectors have attended classes and met the gas inspector qualification. Inspectors: 1-I, 3-II & 1--IV.
- h. Adopted civil penalty amount of \$200,000 to \$2 Million. Taking steps to adopt three regulations before the 24 month period ends.
- i. No issues with description and good information was provided in each section.

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



## PART B - Program Inspection Procedures

Points(MAX) Score

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

### Evaluator Notes:

- a. Yes, this information is located in Oregon Public Utilities Commission Guidelines Procedures for Participating in the Pipeline Safety Program (OR PUC Procedures) Section V, Conducting Inspection page 15.
- b. Yes, this item is located in OR PUC Procedures, Section V, subsection N, Integrity Management page 23.
- c. Yes, this item is located in OR PUC Procedures, Section V, subsection I, Operator Qualification page 22.
- d. Yes, this item is located in OR PUC Procedures, Section V, subsection M, Damage Prevention page 23.
- e. Yes, this item is located in OR PUC Procedures, Section V, subsection L, Operator Training page 22.
- f. Yes, this item is located in OR PUC Procedures, Section V, subsection H, Design, Testing & Construction pages 19-21.
- g. Yes, this item is located in OR PUC Procedures, Section V, page 13-14.

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

### Evaluator Notes:

- a. Yes, this is listed in OR PUC Procedures, Section IV, Inspection Planning, Part B, Inspection Priorities, pages 12-13.
- b. Yes, this is listed in OR PUC Procedures, Section IV, Inspection Planning, Part B, Inspection Priorities, item 7 pages 12.
- c. Yes, this is listed in OR PUC Procedure, Section IV, Inspection Planning, Part B, Inspection Priorities, item 9 page 13.
- d. Yes, this is listed in OR PUC Procedures, Section IV, Inspection Planning, Part B, Inspection Priorities, item 10 page 13.
- e. Yes, this is listed in OR PUC Procedures, Section IV, Inspection Planning, Part B, Inspection Priorities, item 11 page 13.
- f. Yes, a review of progress report confirm units are broken down correctly.

- |   |   |   |   |
|---|---|---|---|
| 3 | (Compliance Procedures) Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1<br>Yes = 3 No = 0 Needs Improvement = 1-2  | 3 | 3 |
|   | <ul style="list-style-type: none"><li>a. Procedures to notify an operator (company officer) when a noncompliance is identified</li><li>b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns</li><li>c. Procedures regarding closing outstanding probable violations</li></ul> |   |   |

### Evaluator Notes:

- a. Yes, this is listed in OR PUC Procedures, Section V, Inspection Planning, Part B, Inspection Priorities, item 10 page 13.
- b. Yes, this is listed in OR PUC Procedures, Section V, Conducting Inspection, Part R, Notice of Violation Tracking , page 27.

c. Yes, this is listed in OR PUC Procedures, Section V, Conducting Inspection, Part S, Removal or Correction of Violation, page 28.

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- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | (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:

- a Yes, this is listed in OR PUC Procedures, Section VI, Investigation of Incidents, page 30-35.
  - b. Yes, this is listed in OR PUC Procedures, Section VI, Investigation of Incidents, page 30-35.
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- |          |                       |           |           |
|----------|-----------------------|-----------|-----------|
| <b>5</b> | General Comments:     | Info Only | Info Only |
|          | Info Only = No Points |           |           |

Evaluator Notes:

No loss of points occurred in this section of the state program evaluation.

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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 DIMP/IMP Training before conducting inspection as lead</li><li>c. Completion of Required LNG Training before conducting inspection as lead</li><li>d. Root Cause Training by at least one inspector/program manager</li><li>e. Note any outside training completed</li><li>f. 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:

Reviewed TQ Blackboard and found four inspectors are Gas Standard Inspector qualified. One inspector (John Ivey) is Gas IMP qualified and lead inspector. PM has not completed Root Cause course and Gas Standard Inspector qualified. One inspector is category I, three category II and one category IV.

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

Mr. Hennessy has been with the OR PUC in the pipeline safety program since 2003. He has been the program manager for more than 5 years.

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

Evaluator Notes:

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

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



## PART D - Program Performance

Points(MAX) Score

- |   |   |   |   |
|---|---|---|---|
| 1 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1<br>Yes = 5 No = 0 Needs Improvement = 1-4  | 5 | 5 |
|   | <ul style="list-style-type: none"><li>a. Standard (General Code Compliance)</li><li>b. Public Awareness Effectiveness Reviews</li><li>c. Drug and Alcohol</li><li>d. Control Room Management</li><li>e. Part 193 LNG Inspections</li><li>f. Construction (did state achieve 20% of total inspection person-days?)</li><li>g. OQ (see Question 3 for additional requirements)</li><li>h. IMP/DIMP (see Question 4 for additional requirements)</li></ul> |   |   |

**Evaluator Notes:**

A review of program manager's spreadsheet confirm all intervals were met for each operator and inspection units. Construction days were met in accordance to the 20% requirement. No issues or concerns with intervals.

- |   |   |    |    |
|---|---|----|----|
| 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. Part 193 LNG Inspections</li><li>f. Construction</li><li>g. OQ (see Question 3 for additional requirements)</li><li>h. IMP/DIMP (see Question 4 for additional requirements)</li></ul>  |    |    |

**Evaluator Notes:**

Yes, OR PUC utilizes the Inspection Assistance forms in conducting Standard, OQ, DIMP, TIMP, CRM, PAPEI and D&A inspections. A review of forms confirm all section were completed and excellent notes were provided in areas of concern or probable violations. No issues.

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

**Evaluator Notes:**

Yes, a review of random selected spreadsheet provided by Program Manager confirm OQ inspections are being conducted in accordance with standard inspections. Additionally, OQ is checked during construction inspections of those individuals performing covered task.

- |   |   |   |   |
|---|---|---|---|
| 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<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 to ensure they are completing the full cycle of the DIMP/IMP process?</li><li>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?</li></ul> |   |   |

- c. Are the states verifying operators are including low pressure distribution systems in their threat analysis?

Evaluator Notes:

- a. A review if random selected spreadsheet confirm all larger operators IMP & DIMP plans are reviewed annually.  
b. Yes. This item is included in the IA inspection supplemental questions.  
c. No low pressure distribution systems in the State of OR.

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
	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. A review of PHMSA portal confirm no cast iron pipe in the State of Oregon. Therefore, questions a & b are no. c. This item appears to be addressed in the IA form on the baseline procedures questions. d & e These items are addressed in the IA question set.

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:

Information on advisory bulletins are shared with the operator at the bi-monthly Oregon Utility Safety Counsel meeting with the operator.

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
	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, b & c. Yes, a review of compliance letters sent for non-compliance issues to the operator were addressed to company officers. Conducted a review of the following letters and found complete with information on violations and areas of concern. Reports reviewed were: 2020-03-AVA HQ D&A 2020-05 NWN Norkenzie Rd & Holly Ave Eugene CONST DIST 2020-25 NWN Highlands Ln and Drummond Dr Gearhart Astoria DIST GCC 2020-30 NWN 6160 Nelson Pl SW Albany DP DIST 2020-34 NWN Ben Brown Ln Woodburn Salem DIST GCC DIST 2020-50 NWN NW Garryanna St Corvallis Albany GCC DIST 2020-53 AVA 21821 N Poe Valley Rd Klamath Falls GCC DIST 2020-58 NWN 3500 SE Concord Rd Space 44 Milwaukie Mt. Scott GCC DIST 2020-75 NWN 5 Oakway Center Eugene GCC DIST 2020-18 CNG Bend GCC DIST TRANS
- d. Yes, inspector and program manager routinely review probable violations letters and time frame for violations to be corrected. Operator is required to response to correct the violation within a scheduled time frame.
- e. Yes, good documentation with a summary was noted in the letters pertaining to violations found.
- f. Yes, the last civil penalty was assessed in 2014. \$40,000 Avista Utilities.
- g. Yes Program Manger reviews and approves all compliance letters.
- h. Yes, due process is provided to the operator in accordance to OR PUC Procedures.
- i. Yes, the inspection form has an exit interview question that is used to share information to the operator about areas of concern or violations found.
- j. Yes, this is completed prior to the 90 day requirement. A review of spreadsheet confirm this is being accomplished

8 (Incident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations? 10 10

Yes = 10 No = 0 Needs Improvement = 1-9

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

Evaluator Notes:

- a. Yes, OR PUC Procedures provide for a mechanism to receive and respond to incidents.
- b, c, d, e, f, g & h. In CY2020 no incidents occurred.
- i. Yes, information pertaining to incidents or other related compliance issues are presented at the State Report at the NAPSR Region Meeting.

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 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

- Yes, Chair Megan Decker response letter to Zach Barrett was received on December 22, 2020 within the required 60 day requirement. No issues.

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

Evaluator Notes:

Oregon Utilities Safety Council Meeting is used to share information about the pipeline safety regulations with the operators.  
OR PUC does not conduct pipeline safety seminars.

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

Evaluator Notes:

Yes. This is checked and reviewed during the IA inspections.

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

Evaluator Notes:

This is completed via the Oregon Utilities Safety Council Meetings.

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

Evaluator Notes:

A review of PHMSA Portal determined no safety related condition reports were submitted in CY2020.

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

Evaluator Notes:

Yes they continue to participate in NAPS/NARUC surveys.

- 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:

One waiver is still active. The waiver number is PHMSA 2012-0323. Other previous waivers have been closed out. No current waivers or permits have been issued.

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

Evaluator Notes:

Yes, unable to view files but items provided via internet were found accessible and accurate with 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 the SICT and found the information has not been completed as of July 15, 2021. However, the program manager is aware of the tool and how it works.

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

Evaluator Notes:

Reviewed PHMSA Portal on Oregon's metrics with Program Manager. Slight upward trend in leaks scheduled for repair at end of year per 1000 miles. Downward trend in leaks repaired per 1000 miles.

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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, this is presented and discussed at the Oregon Utility Safety Committee Council meetings. The last meeting was held May 2021.

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

Evaluator Notes:

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

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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:

Three separate inspections were performed on different operators over a two day period. On August 18th the first inspection was performed on a construction site with a new service line being installed due to existing line not sized correctly. The location was 718 Fifth Street Lake Oswego, OR. The second inspection was a pipeline damage incident that occurred at the Fibert Run Potential Future Park Site in Oregon City, OR. The third inspection was performed on August 19th at Linn County Government 3010 Ferry Street in Albany, OR. The last inspection was performed using IA and relative to MAOP and uprating the intrastate transmission pipeline.

- 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, it was observed the inspector using OR PUC iPad computer to access the inspection forms for each type of inspection being performed. The OR PUC forms have several drop down menu items that allows the inspector to enter the answers to each question he ask the operator to monitor compliance to pipeline safety regulations. A review of inspection reports confirm all items were checked or an answer provided for each question.

- 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, it was observed the inspector asking questions to each of the operator's representatives about the company's procedures and verification of material being installed or repaired at each site. OQ records were reviewed along with calibration of equipment being used and pressure test results of newly installed service line. The depth of the service line was checked and observation of purging the new service line. The second inspection was relative to a contractor hitting a two-inch gas line during construction at a new park site. The inspector asked questions about the locating marks of the facilities and observed the gas company's response to the leaking natural gas from a damaged two inch main line. A detailed inspection and investigation was performed. Several questions and company records were reviewed. Time was spend observing the squeeze off of the main line and making the area safe. The third inspection was performed at Linn County Government in Albany, Or. This was a review of an existing intrastate transmission pipeline. The inspection consisted of a review of the pipeline using the IA questions. The operator was considering uprating the line. The inspector asked several questions and reviewed the operator's construction drawings, records and test pressure charts.

- 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, Cody Cox demonstrated an excellent knowledge in performing pipeline safety inspections. He asked several questions

during the performance of the three inspection and documented the results in the inspection forms. Mr. Cox has completed all the required TQ courses to be a gas safety inspector.

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

Evaluator Notes:

Yes, at each inspection location Mr. Cox performed an exit interview with all company or operator personnel. No violations were found but areas of concerns were discussed to provide the operator an opportunity to make improvements in their performance.

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- 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, all inspections were performed in a safe manner. Safety clothing, hard hats and safety boots were worn at each of the inspection sites.

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

Evaluator Notes:

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

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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:**

OR PUC staff download from PHMSA website data on the operator's annual reports. The data is reviewed pertaining to leakage, miles of pipe, damages to facilities and other relative information. The data is rank risk and used in performing inspections. The data is reviewed with the operators during meetings conducted by OR PUC.

- |   |  |   |   |
|---|--|---|---|
| 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 | 2 |
|---|--|---|---|

**Evaluator Notes:**

Yes. Annual report data downloaded from PHMSA website is shared with larger distribution systems pertaining to leakage and damages. The data is listed in a spreadsheet that reflects the performances of the operator over a performance period and if improvements are being made. The spreadsheet shows damages in accordance to Section D of the annual report. The data is discussed with the operator during IM inspections or Oregon Utilities Safety Council Meetings.

- |   |   |   |   |
|---|---|---|---|
| 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 | 4 |
|---|---|---|---|

**Evaluator Notes:**

- a. Yes, OR PUC uses the PHMSA Annual Operator's report data to review the root causes of damages occurring on distribution systems. The data is reviewed annually and downloaded into an Excel spreadsheet for review.
- b. Yes, this is accomplished during the download and review of PHMSA's Operator annual report data.
- c. Yes, this is accomplished during the download and review of PHMSA's Operator annual report data.
- d. Yes, this is reviewed during the Drop-in Inspections of operators. A review of the qualifications of the individuals and written procedures is conducted on-site.
- e. Yes, this is reviewed during the Drop-in inspections.
- f. The number of damages resulting from mismarks are 146 as determined by Program Manager data sheet.
- g. The number of damages resulting from not locating within time requirements are 2 as determined by Program Manager data sheet.
- h. Yes, this is reviewed during the IMP inspection.
- i. Yes, this is reviewed during the Drop-in Inspections of operators.
- j. Yes, this is reviewed during the download of PHMSA's Annual Operator reports.

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

Evaluator Notes:

- a. Contractor are causing the highest number of damages in OR.
- b. Yes, this is checked during the IM inspections.
- c. Yes, it has found that "Insufficient excavation practices" per annual report best describes the reason for excavation damages in OR.
- d. Yes, this is checked during IM & Drop-in inspections conducted by staff members.

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

Evaluator Notes:

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

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



## 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:

OR PUC does not have a 60106 agreement with PHMSA and not an interstate agent.

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

Evaluator Notes:

OR PUC does not have a 60106 agreement with PHMSA and not an interstate agent

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

Evaluator Notes:

OR PUC does not have a 60106 agreement with PHMSA and not an interstate agent

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

Evaluator Notes:

OR PUC does not have a 60106 agreement with PHMSA and not an interstate agent

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

Evaluator Notes:

OR PUC does not have a 60106 agreement with PHMSA and not an interstate agent

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

Evaluator Notes:

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

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