



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

1200 New Jersey Avenue SE  
Washington DC 20590

## 2021 Gas State Program Evaluation

for

ARKANSAS PUBLIC SERVICE COMMISSION

### Document Legend

#### PART:

- O -- Representative, Dates and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- State Qualifications
- D -- Program Performance
- E -- Field Inspections
- F -- Damage prevention and Annual report analysis
- G -- Interstate Agent/Agreement States



# 2021 Gas State Program Evaluation -- CY 2021

Gas

**State Agency:** Arkansas

**Agency Status:**

**Date of Visit:** 10/25/2022 - 10/27/2022

**Agency Representative:** Rocky Hickman, Angela Sartori

**PHMSA Representative:** Joe Subsits

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

**Name/Title:** Katie Anderson, Chair

**Agency:** Arkansas Public Service Commission

**Address:** 1000 Center Street, P.O, Box 400

**City/State/Zip:** Little Rock, Arkansas 72203-0400

**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 2021 (not the status of performance at the time of the evaluation). A deficiency in any one part of a multiple-part question should be scored as "Needs Improvement." Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the appropriate notes/comments section. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and they OBJECTIVELY reflect the state's program performance for the question being evaluated. Increasing emphasis is being placed on how the state pipeline safety programs conduct and execute their pipeline safety responsibilities (their performance). This evaluation, together with selected factors reported in the state's annual progress report attachments, provide the basis for determining the state's pipeline safety grant allocation.

## Scoring Summary

### PARTS

### Possible Points Points Scored

A	Progress Report and Program Documentation Review
B	Program Inspection Procedures
C	State Qualifications
D	Program Performance
E	Field Inspections
F	Damage prevention and Annual report analysis
G	Interstate Agent/Agreement States

0	0
15	13
10	9
50	47
15	15
10	9
0	0

### TOTALS

**100 93**

**State Rating** ..... **93.0**

## 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
- Stats On Operators Data - Progress Report Attachment 1
  - State Inspection Activity Data - Progress Report Attachment 2
  - List of Operators Data - Progress Report Attachment 3\*
  - Incidents/Accidents Data - Progress Report Attachment 4\*
  - Stats of Compliance Actions Data - Progress Report Attachment 5\*
  - List of Records Kept Data - Progress Report Attachment 6 \*
  - Staff and TQ Training Data - Progress Report Attachment 7
  - Compliance with Federal Regulations Data - Progress Report Attachment 8
  - Performance and Damage Prevention Question Data - Progress Report Attachment 10\*

### Evaluator Notes:

- Arkansas PUC has 151 operators. 124 are master meters, there are 4 private distribution companies, 6 municipal systems, 3 propane systems, 12 transmission systems and 2 gathering systems. This information was taken from the previous progress reports.
- Arkansas was required to have 510 SICT days. They had 912 days and 188 construction days.
- There is a conflict between private unit counts. Attachment 1 lists 20 units. Attachment 3 list 38 units.
- There were 4 federally reportable incidents in 2021 progress report. There was a pinhole corrosion leak by Enable (2/1/2021). Centerpoint had two incidents first party damage (5/5/2021) and outside force damage (2/6/2021). Black Hill Energy had an outside force damage incident. (6/6/2021)
- 11 violations were carried over from 2020. 51 additional violations were found in 2021. 10 violations were corrected. There were no violations to be corrected listed in attachment 5. Compliance numbers did not add up correctly.
- Records list appeared comprehensive.
- Rocky Hickman is the new supervisor. Bobby Henry worked 8 months. Angela Sartori was the new Director of Pipeline Safety. Rocky reports to Angela.
- (\$200,000/\$2,000,000) penalty amount was adopted on 9/25/2014. Use of Plastic Pipe systems in Transportation and 3/12/21 Regulatory reform not adopted yet. 4/23/19 Drug Testing corrections not adopted yet.
- Planned performance and past performance activities were identified by state. No issues identified.

Private units need to be the same for attachments 1 and 3. Compliance numbers on attachment e need to add up correctly.

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:

Pre inspection is covered in Section II. Post inspection is covered in section III.

- a. Standard inspection addressed in section III. Public awareness is addressed in section X. Drug and Alcohol is addressed in section XI. There was no section addressing control room management.
- b. IMP is addressed in section VI and DIMP is addressed in section VII.
- c. OQ is addressed in section V.
- d. Damage Prevention is addressed in Section III as part of the standard inspection.
- e. On-site training is addressed in section XII.
- f. Construction inspections are addressed in section VIII.
- g. There is no LNG in Arkansas.

Procedures need to address control room management inspections.

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

Inspection planning is addressed in section I. Risk factors which may impact inspection frequencies are identified in this section.

- |   |   |   |   |
|---|---|---|---|
| 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 | 2 |
|   | <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. Procedure does not appear to clearly state who letters need to be addressed to.
- b. Procedures did not describe how compliance issues will be managed
- c. Procedures describing how probable violations will be closed out were missing.

There were no procedures describing who letters will be addressed to, how compliance issues will be managed, and how outstanding violations will be closed out.

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- 4 (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident? 3 2

Yes = 3 No = 0 Needs Improvement = 1-2

- a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports
- b. If onsite investigation was not made, do procedures require on-call staff to obtain sufficient information to determine the facts to support the decision not to go on-site.

Evaluator Notes:

Incident investigations are covered in section IX.

- a. Procedures describing how incident reports are received, recorded and responded to need to be written.
  - b. Procedures to address decisions to not perform an on-site investigation were not found. Procedures should require process to ensure enough facts are collected to make determination to not go to an incident investigation.
- 

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Procedures were needed to address control room management inspections. Procedures were also required to identify who compliance letters will go to. Procedures should also identify how compliance processes will be managed. There should also be procedures describing probable violation closure procedures. There should also be procedures describing how notices of incident reports are to be received, recorded and responded to. There should also be procedures requiring sufficient information to support decision to not go to a federally reportable incident.

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Total points scored for this section: 13  
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 4.3<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:

All inspectors are qualified to do all gas inspections. Qualifications were confirmed on T&Q blackboard. No outside training was noted for last year.

- |   |  |   |   |
|---|--|---|---|
| 2 | Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations?<br>Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 4 |
|---|--|---|---|

Evaluator Notes:

Rocky Hickman has been program manager for less than one year. He still has to pass all his core classes. Rocky has 39 years of pipeline experience. 23 years in distribution and the remaining years in production and gathering. There will be a 1-point deduction for being a new program manager.

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

Evaluator Notes:

Rocky is a new program manager with less than one year experience as a regulator. There is a one-point deduction.

Total points scored for this section: 9  
Total possible points for this section: 10



## PART D - Program Performance

Points(MAX) Score

- |   |   |   |   |
|---|---|---|---|
| 1 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1<br>Yes = 5 No = 0 Needs Improvement = 1-4  | 5 | 4 |
|   | <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:

Inspection intervals for various types of inspections were checked.

- a. Standard inspections were within the required intervals
- b. Public awareness inspections were within the required intervals
- c. The most recent inspection dates for the drug and alcohol inspections was 4/24/2019. The previous drug and alcohol inspection dates was 9/29/2011 which exceeds the 5 year required interval.
- d. Control room management inspection intervals were met.
- e. There is no LNG in Arkansas
- f. The 20 % inspection day requirement was met.
- g. OQ inspection intervals were met
- h. IMP/DIMP inspection intervals were met.

There is a 1-point deduction for not meeting previous drug and alcohol inspection frequencies.

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

a-h Federal inspection forms are used. The State also uses a state supplemental checklist. Inspection forms were filled out completely.

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

Programmatic Operator Qualification inspections were completed within the required intervals. Protocol 9 inspections are performed during the standard field inspections.

- |   |   |   |   |
|---|---|---|---|
| 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 Subparts O and P  | 2 | 2 |
|   | Yes = 2 No = 0 Needs Improvement = 1  |   |   |
|   | <ul style="list-style-type: none"> <li>a. Are the implementation plans of the state's large/largest operators(s) being reviewed annually to ensure they are completing full cycle of the 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> <li>c. Are the states verifying operators are including low pressure distribution systems in their threat analysis?</li> </ul> |   |   |

Evaluator Notes:

- a. Rocky was reminded of the requirement to annually review IMP/DIMP plans for the largest operator. Rocky believed this was being done.
- b. Verification of problematic pipe is performed during DIMP inspections.
- c. Rocky was reminded of the need to require that low pressure distribution systems be incorporated into the DIMP threat assessment.

- |   |   |   |   |
|---|---|---|---|
| 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  |   |   |
|   | <ul style="list-style-type: none"> <li>a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken;</li> <li>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);</li> <li>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;</li> <li>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;</li> <li>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;</li> <li>f. Operator procedures for considering low pressure distribution systems in threat analysis?</li> <li>g. Operator compliance with state and federal regulations for regulators located inside buildings?</li> </ul> |   |   |

Evaluator Notes:

NTSB recommendations are addressed in the state supplemental checklist.

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

Rocky was informed of the need to address advisory bulletins as they are released.

- |   |  |    |    |
|---|--|----|----|
| 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  |    |    |
|   | <ul style="list-style-type: none"> <li>a. Were compliance actions sent to company officer or manager/board member if municipal/government system?</li> <li>b. Were probable violations documented properly?</li> </ul>                             |    |    |

- 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:

- Inspection reports were reviewed and found to be properly managed.
- a. Compliance letters were submitted to the appropriate company officer.
  - b. Probable violations were properly documented.
  - c. Probable violations were properly resolved and tracked.
  - d. All Compliance issues were properly managed and tracked.
  - e. Probable violations were identified for all violations identified in inspection reports.
  - f. There has been evidence of fining authority.
  - g. The program manager approves and monitors all compliance actions.
  - h. Show cause hearing are options or operator due process.
  - i. Exit interviews are documented in the inspection documentation and data base.
  - j. Compliance letters were released within the 90 day requirement.

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8	(Incident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations?	10	8
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Yes = 10 No = 0 Needs Improvement = 1-9

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

Evaluator Notes:

- a. Rocky receives all notifications of pipeline incidents. Email notices are also received.
- b. There notices were on Bobby's computer.
- c-g. There was no investigation documentation provided.
- h. There were no requests for assistance made.
- i. Lesson learned are shared during the NAPS regional meeting.

There was no investigation documentation provided during the evaluation.

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

Evaluator Notes:

There were no issues during the last evaluation. A letter was sent to chair Ted Thomas. Katie Anderson is the new Commission Chair.

- 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:

The next pipeline seminar is scheduled for 8/14/2023. There were covid related delays. The previous seminar was in 2019.

- 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:

This question is addressed in the transmission checklist.

- 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:

The web page is the top rated web site in the pipeline safety trust web page evaluation. The web page includes regulations, safety tips emergency numbers, enforcement information, damage prevention information. Mailouts are also used.

- 13 Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.7 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

There were no safety related conditions. This is confirmed in the pipeline data mart.

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

Evaluator Notes:

Rocky was reminded to have evidence that he had responded to NAPSRS surveys. WMS is periodically checked.

- 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:

Rocky was directed to PHMSA's waiver/special permit web page. He was reminded to keep track of waivers and get them closed as required.

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

Evaluator Notes:

Key information was not readily available. Incident information could not be retrieved from the file.

- 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:

Arkansas had 510 SICT days in 2021. SICT days and required construction days were achieved. There will be a comment of next years SICT submission. Arkansas needs to list risk concerned for larger operators..

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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:

Rocky was directed to the state program performance metrics.

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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:

A discussion was held with Rocky describing possible ways to promote Safety Management Systems.

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

Evaluator Notes:

There are point deductions for lack of investigation reports and extended inspections frequencies for drug and alcohol inspections.

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Total points scored for this section: 47  
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:

- The inspection reviewed was the field portion of a standard inspection.
- The Conway unit of Summit Utilities was inspected.
- This unit was last inspected 4 years ago.
- Jason Donovan and Greg Rienhart were the inspection. Greg is currently being trained.

- 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:

Federal forms are being used for standard inspections.

- 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:

The evaluation covered the field portion of standard inspection. Inspected were regulator stations and corrosion control facilities.

- 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:

Jason appeared qualified to perform the standard inspection.

- 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:

An exit interview was conducted at the end of the field portion of the standard inspection.

- 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
- 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:

Proper PPE was worn. The inspection was conducted in a safe manner. The inspections reviewed set points, pipe to soil readings, atmospheric corrosion, vent condition.

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7 General Comments:

Info Only = No Points

Info Only Info Only

Evaluator Notes:

no issues with Part E.

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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**

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues.<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 1 |
|----------|--|---|---|

Evaluator Notes:

There was no evidence that annual reports were reviewed in 2021.

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | Has the state verified that the operators analyze excavation damages for the purpose of determining root causes and minimizing the possibility of a recurrence? (192.617)<br>Has the state verified that the operators have appropriately identified excavators who have repeatedly violated one-call laws and damaged their facilities. Have the operators taken steps to mitigate that risks? (192.1007)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

The state requests damage prevention information for the operators. This information includes causal information.

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

Evaluator Notes:

Annual reports were not reviewed

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests?<br>Yes = 2 No = 0 Needs Improvement = 1 <ol style="list-style-type: none"><li>a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.</li><li>b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages?</li><li>c. Has the state evaluated which of the following best describes the reason for the excavation damages; i.e., operator or contractor not following written procedures, failure to maintain marks, failure to support exposed facilities, failure to use hand tools were required, failure to test-hole (pot hole), improper backfilling practices, failure to maintain clearance or insufficient excavation practices.</li><li>d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?</li></ol> | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

Information has been requested by the Commission for review.

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**5** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There is a point deduction for not reviewing annual reports.

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Total points scored for this section: 9  
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:

Arkansas is 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:

Arkansas is 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:

Arkansas is 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:

Arkansas is 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:

Arkansas is not an interstate agent.

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

Evaluator Notes:

Arkansas is not an interstate agent.

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