



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

1200 New Jersey Avenue SE
Washington DC 20590

2022 Hazardous Liquid State Program Evaluation

for

CAL FIRE - OFFICE OF THE STATE FIRE MARSHAL

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



2022 Hazardous Liquid State Program Evaluation -- CY 2022
Hazardous Liquid

State Agency: California

Agency Status:

Date of Visit: 07/11/2023 - 07/13/2023

Agency Representative: Jim Hosler, Chief Pipeline Safety Division,

PHMSA Representative: Joe Subsits

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

Name/Title: Daniel Berlant, Acting State Fire Marshal

Agency: California State Fire Marshal

Address: 2251 Harvard Street, Suite 400

City/State/Zip: Sacramento, CA 95815

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 2022 (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
49
15
6
0

TOTALS

96 95

State Rating

99.0

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:

There were 50 points scored on the progress report.

- The progress report identifies 24 intrastate refined product pipelines with 60 units. There are 34 intrastate crude oil pipelines and 67 units. There were 6 HVL systems and 6 units. The State has jurisdictional authority for all operators. Operator counts come from APOR data base. This is compared to the PHMSA data base.
- There were 1471 inspection days in 2022. 1346 days were required in SICT. Inspectors fill out activity reports with oversight of project leads. Activity reports are in PIMS (Pipeline information management system).
- Attachment 3 unit numbers are consistent with the attachment 1 numbers.
- There were 10 incidents reported in 2022. This matches PDM. There was an eleventh incident that was not determined to be an incident until March 2023. This late report is an ongoing compliance issue.
- 70 violations were correctly carried over from FY 2021. Compliance numbers were computed accurately. Compliance items are tracked on the "compliance action tracker" spreadsheet. The compliance spreadsheet is checked periodically by Doug.
- The list of records appears appropriate.
- The progress report was consistent with T&Q blackboard.
- All amendments were adopted within the two-year timeframe.
- Inspection days were met, several incidents were investigated. Several Coastal best available technologies (CBAT) were met. SB295 and coastal best AB264 are State legislative actions.

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

PART B - Program Inspection Procedures

Points(MAX) Score

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|---|---|---|---|
| 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 -inspection activities are found in section 7.1., inspection procedures covered in section 7.5, 7.6 and 7.7. Post inspection activities are covered in section 7.8. Pre-Inspection and post inspection activities are also covered in the various sections covering different types of inspections.

- a. Standard inspections are covered in section 7.9. Control Room Management is covered in section 7.14. Public Awareness is covered in section 7.15. and Drug and Alcohol is covered in section 7.16.
- b. IMP is covered in section 7.23 and section 7.24.
- c. OQ is covered in section 7.12 and 7.13.
- d. Damage Prevention inspections are covered in section 7.22.
- e. New operator requirements are covered in section 7.21.
- f. Construction inspections are covered in section 7.11.

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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:

a-f Inspection prioritization is addressed in section 6.2 and 6.3. Detailed inspection prioritization considerations are identified in section 6.2 and 6.3.

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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:

The enforcement Program is covered in Section 10. Civil penalties are addressed in section 10.4. Hearings are addressed in section 10.5.

- a. Submission to chief corporate officers is addressed in section 10.4.
- b. 90-day response is found in section 10.3. Exit interview are required at the end of the inspection. This is found in section 7 under each of the inspection types.
- c. Compliance closure is addressed in section 10.10.

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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:

Incident procedures are addressed in section 9.2.

a. Notification is addressed in section 9.1.

b. Procedures to address decisions to not go on-site for investigations is found in Section 9.1.5.

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

Evaluator Notes:

There are no issues with Part B.

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 4.3
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:

Liquid core qualified inspectors are Aimee Cauquiran, Alula Gebremedhin, Malek Itani, Enrique Jimenez, Nhu Dan Le, Charles MacDonald, Hossein Monfared, Ha Nguyen, Durga Shrestha, Sampson Tang, Tuan Tran, Bitam Emami, Al Giese, Justin Harer, Mark McCaleb, Xuan Nguyen and Linda Ziglar. Only Thomas Williams is not core qualified.

- a. All inspectors are OQ qualified except Justin Harer, Mark McCaleb and Thomas Williams.
- b. Liquid IMP qualified inspectors are Aimee Cauquiran, Alula Gebremedhin, Malek Itani, Enrique Jimenez, Nhu Dan Le, Charles MacDonald, Hossein Monfared, Ha Nguyen, Durga Shrestha, Sampson Tang, and Tuan Tran.
- c. The IMP qualified inspectors are also root cause trained except for Xuan Nguyen and Linda Ziglar. Failure investigation trained inspectors are Aimee Cauquiran, Alula Gebremedhin, Hossein Monfared, Ha Nguyen, Durga Shrestha, Sampson Tang, and Tuan Tran.
- d. Two staff members attended training by Clarion. No group training was conducted.
- e. New Inspectors are required to inspect under management oversight prior to inspecting on their own.

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

Jim has been program manager for 5 years. He has worked for the State Fire Marshal for 7 years. Jim worked for Operators prior to working for the Fire Marshal. He worked 35 years with industry including ARCO, Plaines, and Kinder Morgan. Jim is core hazardous liquids trained.

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

There were no issues with Part C.

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 | 4 |
| | <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:

Cal Fire Marshal is up to date on current inspection frequencies. Several previous inspection frequencies were exceeded. This has been a reoccurring issue identified in previous reports.

- a. There were three instances of prior inspection frequencies being exceeded.
- b. There was once instance of a public awareness prior inspection frequency being exceeded.
- c. There were two instances of previous drug and alcohol inspection frequencies being exceeded.
- d. There were four instances of previous inspection frequencies being exceeded.
- e. N/A, This is a liquids operator.
- f. There were four instances of previous OQ inspections being exceeded.
- g. There were two instance of previous IMP inspection frequencies being exceeded.

Exceeding previous inspection frequencies results in a 1-point deduction.

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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:

CA SFM uses the inspection Assistant (IA). IA was filled out completely and correct for the operators that were evaluated. Operators were chosen from the random operator list.

- a. IA was filled out completely and correctly.
- b. IA was filled out completely and correctly.
- c. IA was filled out completely and correctly.
- d. IA was filled out completely and correctly.
- e. N/A, this is a liquids operator with little construction activity.
- f. IA was filled out completely and correctly.
- g. IA was filled out completely and correctly.

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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 Part 195 Subpart G
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

Protocol 9 is filled out for all standard inspections. Forms were checked for operators on the random inspection list. Current frequencies for OQ inspection are up to date.

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| 4 | Is state verifying operator's integrity management Programs (IMP and DIMP)? This should include a review of plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operator's plan(s). 49 CFR Part 195 Subpart F & G | 2 | 2 |
|---|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

- 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?

Evaluator Notes:

An annual operator inspection conducted for all operators. Imp activities and program modifications are covered during these visits. A risk checklist /form is also submitted annually for each operator. This information is used to populate the risk assessment and for inspection planning.

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| 5 | Did the state review the following (these items are NTSB recommendations to PHMSA that have been deemed acceptable response based on PHMSA reviewing these items during the evaluation process): Chapter 5.1 | 2 | 2 |
|---|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

- a. 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
- b. Directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies;

Evaluator Notes:

- a. This issue is addressed during the annual operator meeting.
- b. Operator procedures for drilling are addressed prior to construction projects

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| 6 | Did the State verify Operators took appropriate action regarding advisory bulletins issued since the last evaluation? (Advisory Bulletins Current Year) | 1 | 1 |
|---|---|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The advisory bulletin is found on the CASFM web page. Operators were notified of the advisory bulletin during the annual operator meeting and during the pipeline safety seminar.

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| 7 | (Compliance Activities) Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1 | 10 | 10 |
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Yes = 10 No = 0 Needs Improvement = 1-9

- a. Were compliance actions sent to company officer or manager/board member if municipal/government system?
- b. Were probable violations documented properly?
- c. Resolve probable violations
- d. Routinely review progress of probable violations
- e. Did state issue compliance actions for all probable violations discovered?
- f. Can state demonstrate fining authority for pipeline safety violations?
- g. Does Program Manager review, approve and monitor all compliance actions? (note: Program Manager or Senior Official should sign any NOPV or related enforcement action)
- h. Did state compliance actions give reasonable due process to all parties? Including "show cause" hearing, if necessary.
- i. Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns
- j. Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. (Incident investigations do not need to meet 30/90-day requirement)

Evaluator Notes:

Compliance actions were properly documented with appropriate resolution. Compliance activates were reviewed for

operators on the random inspection list.

- a. Compliance letters were sent to appropriate chief officer.
- b. Probable violations were properly identified and documented.
- c. Appropriate compliance issues were resolved.
- d. Open compliance issues are monitored by Doug Allen. Doug has a spreadsheet which is used to track open compliance issues.
- e. Compliance actions were taken for all identified issues.
- f. in 2022, \$320,560 in penalties was assessed, \$67,825 was collected. 16 civil penalties were assessed.
- g. Jim has final approval for all compliance actions.
- h. The opportunity for due process is identified in compliance letters. Letter templates are used.
- i. Exit interviews are conducted on the last day of the inspection.
- j. Written Post Inspection findings are submitted within 90 days.

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

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

Evaluator Notes:

All federally reportable incidents were investigated and documented with conclusions and recommendations.

- a. Engineers take turn being on call. Notices received by state emergency center. There is also a supervisor on call to manage accident activities. A memo is received as initial documentation sent by the emergency center to the fire marshal.
- b. The memo by the Emergency Contact Center serves as the initial communication for the incident.
- c. Justification for no-go decisions is kept in the SFM data base. There was one instance of not going on-site. Ultramar incident was 9/14/2022 reported late. This is a current compliance/enforcement issue.
- d. Observations were found in incident documentation.
- e. Contributing factors were found in incident documentation.
- f. Recommendations to prevent reoccurrence were found in incident documentation.
- g. The incidents which will result in compliance actions were not complete yet.
- h. PHMSA has staff stationed in California so there has not been any need to involve the Fire Marshal in interstate investigations.
- i. Lessons learned are presented at state seminar and at staff meetings.

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
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A PHMSA Letter to Michael Richwine was dated 8/17/2022. The CASFM response was dated 10/14/2022. Michael retired on December 31. The acting State fire marshal is Daniel Berlant. The address is same as previous letter.

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

Evaluator Notes:

Seminars are done Annually. June 6, 2023 was the last seminar. June 29 - 30 2022 was the previous seminar. Seminars are one day seminars except every three years is a two-day seminar which includes T&Q staff.

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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:

Transmission mapping information is asked for during the annual operator meeting.

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| 12 | Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public).
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

The Fire Marshal web page has information on the advisory safety committee, hydrostaic testing, metrics, PHMSA state page, NPMS, damage prevention contacts, safety news and resources, laws regulations, inspection program enforcement, annual report and PHMSA notifications. CASFM also has an annual meeting with operators. Enforcement information is available with FOIA requests.

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

There were two SRCs by California liquid Operators in 2022. An 11/17 2022 an SRC was reported by Shell Pipeline and a 8/19/2022 SRC was reported by SFPP Kinder Morgan LP. Both conditions were conditions that could lead to imminent hazard. Shell oil is still open trying to get permits. SFPP documentation in IA inspections. A specialized Inspection plan was developed within IA to document the SRC.

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

- a. Jim responds to NAPSRS surveys.
- b. Huy and Doug monitor the PHMSA data base. IM requests are managed by Huy. Doug manages general Operator changes.

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| 15 | If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate.
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

There are two active state waivers. Phillips will go away in about two years. Plains waiver on selective seam corrosion is monitored as specialized and annual inspection. This is a 10-year waiver. Alin requested closing expired waivers for most on July 6, 2022. It was suggested that Alin resubmit waiver closure request to the address in the state guidelines. Alin resubmitted a waiver closure request to the address identified in the State guidelines.

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

Electronic files were complete and readily accessible.

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|-----------|---|---|---|
| 17 | Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT). Has the state updated SICT data?
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
|-----------|---|---|---|

Evaluator Notes:

The 2022 SICT day requirement was 1346 days. CASFM had 1471 inspection days. SICT comments noted that many risk consideration fields were not filled out. Jim addressed this issue.

- 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:

Jim stated that he regularly reviews the State metrics on PHMSA's web page.

- 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 are promoted in the Commissions advisory bulletin letters. This is also done during the annual operator meeting,

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

Evaluator Notes:

There was a one-point deduction for not meeting previous inspection frequencies for several inspections.

Total points scored for this section: 49
Total possible points for this section: 50



PART E - Field Inspections

Points(MAX) Score

- 1 Operator, Inspector, Location, Date and PHMSA Representative (enter specifics into the comments box below) Info Only Info Only

Info Only = No Points

- What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc)
- When was the unit inspected last?
- Was pipeline operator or representative present during inspection?
- Effort should be made to observe newest state inspector with least experience

Evaluator Notes:

An inspection was conducted on CRC Thums Resource Company. The operate five offshore platforms off the coast of Long Beach.

- A standard inspection was performed. Records review and field work was evaluated.
- This operator was last inspected in 2022.
- Operators were present during the inspection.
- Primary inspectors were Al Giese and Andy Chau. Both inspectors have five years regulator experience,

- 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:

The Cal State Fire Marshall uses IA. A tablet is used during the field inspection portion of the inspection.

- 3 Did the inspector adequately review the following during the inspection 10 10

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

- Procedures (were the inspector's questions of the operator adequate to determine compliance?)
- Records (did the inspector adequately review trends and ask in-depth questions?)
- Field Activities/Facilities (did inspector ensure that procedures were being followed, including ensuring that properly calibrated equipment was used and OQ's were acceptable?)
- Other (please comment)
- Was the inspection of adequate length to properly perform the inspection?

Evaluator Notes:

Procedures were used to evaluate OQ field activities.

b. Record review was observed. The IA checklist was followed, and adequate records were reviewed. c. Field activities included review of leak detection processes, atmospheric corrosion, pipe to soil readings, breakout tanks, launcher receivers, emergency valves pumps, pressure switches, calibration records, MOP and fire control systems.

d. N/A

e. The inspection was an adequate length. It consisted of records review and field visits.

- 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:

The inspectors had good knowledge of pipeline safety regulation and pipeline operation. They asked good questions and did a good job with follow up questions.

- 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 after the inspection. The exit interview covered the entire inspection.

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:

- a. The inspection was conducted in a safe manner. Inspectors wore proper PPE equipment. The inspectors worked well together as a team.
- b. Inspectors reviewed leak detection processes, atmospheric corrosion, pipe to soil readings, breakout tanks, launcher receivers, emergency valves pumps, pressure switches, calibration records, MOP and fire control systems.
- c. Written probable violations were provided during the exit interview.
- d. N/A

7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues with Part E.

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 during the annual operator inspection. There is no information to trend.

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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 |
|---|--|---|---|

Evaluator Notes:

All excavation damage is viewed as an accident and investigated as an accident.

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

a-j There are not a large number of third party damages for liquid operators. All third party damage accidents are investigated.

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

a-d There are not a large number of third party damages for liquid operators. All third party damage accidents are investigated.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues with Part F.

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:

CA SFM is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

CA SFM is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

CA SFM is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

CA SFM is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

CA SFM is not an interstate agent and does not have a 60106 agreement with PHMSA.

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

Evaluator Notes:

CA SFM is not an interstate agent and does not have a 60106 agreement with PHMSA.

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