



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

1200 New Jersey Avenue SE
Washington DC 20590

2022 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



2022 Gas State Program Evaluation -- CY 2022

Gas

State Agency: Oregon

Agency Status:

Date of Visit: 04/10/2023 - 04/14/2023

Agency Representative: Kevin Hennessy, Chief Pipeline Safety
David Hoy, Senior Pipeline Safety Analyst
Sean Mayo, Senior Pipeline Safety Analyst
Lonny Hazleton, Senior Pipeline Safety Analyst
Derek Crewdson, 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 Service Commission
Address: 201 High Street SE, Suite 100
City/State/Zip: Salem, Oregon 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 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

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

Possible Points Points Scored

0 0
15 15
10 10
50 49
15 15
10 10
0 0
100 99

TOTALS

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
- 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. Number of intrastate operators has changed from 13 to 12 in CY2022. One operator Malarkey Roofing Products has closed down. Total number of operators inspected increased from 64.7% to 87.5%.
- b. Number of inspection person days were 427.8 and meet the SICT requirements of 411. However, the total number of required construction inspections (82) was not achieved. Actual number was 57.6.
- c. Operators match attachment 1 & 3. No issues.
- d. No reportable incidents/accidents occurred in CY2022.
- e. Number of carry-over violations was reduced from previous year. Current carry-over of 15 is lower than previous year of 28. No civil penalties or compliance actions occurred.
- f. A review of records found not issues.
- g. Reviewed TQ Blackboard records and verified 2 inspectors have attended courses and meet gas inspector qualifications. One inspector lacks the completion of PL3293 Corrosion. No one is Gas IM inspector except program manager.
- h. Adopted civil penalty amounts of \$239,142/\$2,391,412. Three regulations are listed, taking steps to adopt. These regulations will need to be adopted by CY2024 or loss of points could occur.
- i. No issues with summary of accomplishments and past performance.

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



PART B - Program Inspection Procedures

Points(MAX) Score

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

Evaluator Notes:

- a. Yes, information on this item is located in Oregon Public Utilities Commission Guidelines Procedures for Participating in the Pipeline Safety Program (OR PUC Procedures) in section V, Conducting Inspections. page 17.
- b. Yes, Section V, subsection N, Integrity Management, page 25.
- c. Yes, Section V, subsection I, Operator Qualification, page 23.
- d. Yes, Section V, subsection M, Damage Prevention, page 24.
- e. Yes, Section V, subsection L, Operator Training, page 24.
- f. Yes, Section V, subsection H, Design, Testing & Construction, page 21.
- g. Yes, Section V, LNG, page 13.

- | | | | |
|---|---|---|---|
| 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 to e. Yes, these items are listed and found in OR PUC Procedures, Section IV, Inspection Planning, Part B, Inspection Priorities, pages 11-12
- f. All inspection units are broken down correctly and this item was check in PHMSA Portal. No issues.

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

- a. Yes, Section V, Inspection Planning, Part P, Notices of Probable Violations, page 26.
- b. Yes, Section V, Conducting Inspection, Part R, Notice of Violation Tracking, page 29.
- c. Yes, Section V, Conducting Inspection, Part S, Removal or Correction of Violation pages 29-30.

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

a & b. Yes, Section VI, Investigation of Incidents, pages 31-35.

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

Evaluator Notes:

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

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 4.3
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 DIMP/IMP Training before conducting inspection as leadc. Completion of Required LNG Training before conducting inspection as leadd. Root Cause Training by at least one inspector/program managere. Note any outside training completedf. 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:

a to f. A review of training records in TQ Blackboard found two inspectors are Category II and one Category IV. One Category II inspector is IM qualified to lead an inspection. Program Manager has completed the Root Cause course and is a qualified gas standard and IM inspector. It is requested the other inspectors attend the required courses to qualify for the IM qualification. All inspectors have completed the LNG course.

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

Evaluator Notes:

Yes, Program Manager has 8 years of experience and been with the OR PUC for nineteen years.

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|---|--|-----------|-----------|
| 3 | General Comments:
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
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. Construction (did state achieve 20% of total inspection person-days?)g. OQ (see Question 3 for additional requirements)h. IMP/DIMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Random operators were selected to check inspection intervals. A review of inspections dates and operator reports found all intervals match OR PUC written procedure requirements. However, the number of construction days conducted 57.6 (13.87%) did not meet the required 82 (20%) level. The loss of one inspector affected their ability to meet the 20% level. Considering this loss and the agency's ability to complete all 114 section inspections before the end of the year, no loss of points occurred.

- | | | | |
|----------|---|----|----|
| 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. Part 193 LNG Inspectionsf. Constructiong. OQ (see Question 3 for additional requirements)h. IMP/DIMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Yes. the continuation of OR PUC using PHMSA Inspection Assistance forms in conducting Standard, OQ, DIMP, TIMP, CRM, PAPEI and D&A inspections meet this requirement. Staff continues to upload reports and letters into OR PUC Huddle program. A review of inspection reports confirmed all sections were completed. No issues.

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|----------|--|---|---|
| 3 | Is state verifying monitoring (Protocol 9/Form15) of operators OQ programs? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals established in the operator's plan. 49 CFR 192 Part N
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

Yes, conducted a review of OQ inspections in Huddle and confirmed the agency is verifying the operator's plans. OQ is checked on individuals performing covered tasks in all construction & damage prevention 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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 1 |
| | <ul style="list-style-type: none">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? | | |

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

Evaluator Notes:

- a. No. A review of the state's largest operators (Northwest Natural Gas, Avista Utilities & Cascade Natural Gas) inspection document confirms these operators were not reviewed annually. The last reviewed was conducted in May 2021. A loss of one point occurred.
- b. Yes, this item is asked and listed in the IA inspection supplemental questions.
- c. No low-pressure systems present in the State of Oregon.

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
	<ul style="list-style-type: none"> 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 & b. No cast iron pipe in the State of Oregon. This information was verified via PHMSA Portal site.
- c thru g. All these items are listed in IA Form on the baseline procedures questions.

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:

- Yes, this is presented and discussed with the operators at the Oregon Utility Safety Council meetings which are conducted monthly.

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
	<ul style="list-style-type: none"> 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. Yes, a review of twenty-five compliance inspections confirmed letters were sent to company officials.
- b. Yes, probable violations were documented and listed in each letter.
- c. Yes, violations are resolved by operator taking immediate action to correct the area of non-compliance.
- d. Yes, program manager and inspectors routinely review cited probable violations monthly. Operators are required to response to probable violations within a scheduled time frame listed in each letter.
- e. Yes, non-compliance issues were listed in each letter.
- f. Yes, the last civil penalty issued was in CY2014 against Avista Utilities. The amount was \$40,000.
- g. Yes, program manager reviews, approves and monitors all compliance actions.
- h. Yes, due process is provided in accordance to OR PUC Procedures.
- i. Yes, exit interviews are conducted with the operator at the end of the inspection.
- j. Yes, a review of inspections and letters confirm the operator is provided the results of the inspection within 90-day period.

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 in Section VI address the mechanism to receive and respond to incidents.
- b-h. No incidents/accidents occurred in CY2022.
- i. Lessons learned on performing inspections and other items were presented at the NAPSR Western regional meeting and to operators who attend the Oregon Utility Safety Council 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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No response letter was required from Ms. Megan Decker due to a score of 100 points.

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:

Yes, information on pipeline safety regulations, advisory bulletins and other related safety items are presented to the operators at the bi-monthly Oregon Utility Safety Council meetings.

- 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 item is continually reviewed and covered in the IA question sets used by staff members.

- 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:

Yes, OR PUC website and meetings with operators at the bi-monthly Oregon Utility Council Meetings in Salem, Bend and Baker City, OR.

- 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:

Yes. Two safety related condition reports were filed in CY2022. The reports pertained to Northwest Natural Gas and Cascade Natural Gas Company transmission lines. Follow-up correspondence and monitoring the corrective action take was performed.

- 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:

- a. Yes, Program Manager has participated in NAPSRS surveys and other request.
b. Yes, a review of Work Management found no outstanding tasks that need to be performed.

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

Evaluator Notes:

No active waivers have been issued. Previous waiver was PHMSA 2012-0323 Avista Utilities on atmospheric corrosion.

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

Evaluator Notes:

Yes, all inspection reports, letters and other pipeline safety documents are maintained electronically via Huddle. The system is reliable, and password protected.

- 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:

Program Manager is familiar with SICT and has updated the report annually.

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

Evaluator Notes:

A review of PHMSA Portal on Oregon's metrics found a downward trend continues on total leaks eliminated/repared, and hazardous leaks repaired and scheduled for repair. A review of excavation damages per 1,000 locate tickets found an upward trend. This trend is similar to the National Average.

- 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 reviewed with the operators at the Oregon Utility Safety Committee Council meetings.

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

Evaluator Notes:

A loss of one point occurred in this section of the review. See question D-4.

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:

- Records and field observation.
- Avista Corporation- Roseburg OR was last inspected in calendar year 2021.
- Yes, Jeff Schwendener, Manager; Steve Boskovich, Pressure Controlman & TJ Cornia, CP Tech
- The lead inspector was Lonny Hazelton who has not been observed previously. Mr. Hazelton has recently been hired by OR PUC. Addition OR PUC inspectors were used in conducting this inspection and included the following individuals: Derek Crewdson, Senior Pipeline Safety Analyst, Sean Mayo, Senior Pipeline Safety Analyst & David Hoy, Senior Pipeline Safety Analyst

- 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, Lonny Hazelton used the Federal IA inspection software and forms to complete the inspection. Each section of the form was checked. All questions were completed with an answer or information provided by the operator. Good documentation was entered into the IA question sets.

- 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, Mr. Hazelton was very thorough in the review of the operator's records and procedures. He asked good questions and if the answer was not clear from the operator a follow-up request was made.
- Yes, Mr. Hazelton reviewed the previous inspection reports and documents to check for trends and clarification of procedures the operator follows. This review assisted him in performing a professional inspection.
- Yes, observations were made on David Hoy who conducting an inspection of Avista personnel performing valve maintenance on a 2" ball valve and other valves in the Rosenberg system.
- Yes

- 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, Mr. Lonny Hazelton is a qualified gas inspector and completed all the required courses at TQ. He conducted a professional and thorough inspection of the gas distribution system.

- 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, an exit interview was conducted on the last day of the inspection and no violations were found. However, areas of concerns were discussed with the operator and may be listed in the letter to Management.

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, excellent safety practices were followed.

7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

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

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

Evaluator Notes:

Yes, Program Manager download data from the public website on the operator's annual reports. The reports are reviewed for trends and accuracy. Data from the review is used to rank risk the operators pertaining to the type of inspections to be performed. Annual reports are reviewed with the operator during inspections.

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

Yes, the agency has conducted reviews of the operator's damage reports to determine if they have identified the root cause of the damages. The agency is tracking the excavators who have damaged facilities and placed this information into OUNC data base. Operators are taking enforcement action, providing training and informative at meetings and outreach to the excavators and other utilities in the affective areas.

- | | | | |
|---|---|---|---|
| 3 | Has the state reviewed the operator's annual report pertaining to Part D - Excavation Damage?
Yes = 4 No = 0 Needs Improvement = 1-3 <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)? | 4 | 4 |
|---|---|---|---|

Evaluator Notes:

- a. Yes, OR PUC continues to use PHMSA's Annual report data to review root causes of damages occurring on distribution systems. The data is imported into an Excel spread sheet and reviewed.
- b. Yes, this is reviewed after downloading the data from PHMSA's portal website.
- c. Yes, OR PUC reviewed the causes for damages in each report.
- d. Yes, this item is reviewed during construction and damage prevention drop-in inspections.
- e. Yes, this reviewed during the records review and construction inspections.
- f. The number of damages from mismark are 129.
- g. The number of damages from not locating within time requirements are 397.
- h. Yes, this is conducted and reviewed during the IMP inspection.
- i. Yes, reviewed during drop-in damage prevention inspections.
- j. Yes, this is reviewed after downloading the 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. Contractors/Developers continue to be the stakeholder group causing the highest number of damages.
- b. Yes, this item is reviewed during the IM inspections. Program Manager was recently appointed to the OUNC Board of Directors and anticipates working with Board Members in supporting better rules and operations of the center.
- c. Yes, "No Locate Request" per annual report best describes causes of excavation damages.
- d. Yes, this is checked during IM & Drop-in inspections.

5 General Comments:

Info Only Info Only

Info Only = No Points

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 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 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:

OR PUC 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:

OR PUC 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:

OR PUC 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:

OR PUC 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:

OR PUC 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