



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

1200 New Jersey Avenue SE  
Washington DC 20590

# 2010 Hazardous Liquid State Program Evaluation

for

MISSISSIPPI PUBLIC SERVICE COMMISSION

## Document Legend

### PART:

- O -- Representative Date and Title Information
- A -- General Program Qualifications
- B -- Inspections and Compliance - Procedures/Records/Performance
- C -- Interstate Agent States
- D -- Accident Investigations
- E -- Damage Prevention Initiatives
- F -- Field Inspection
- G -- PHMSA Initiatives - Strategic Plan
- H -- Miscellaneous
- I -- Program Initiatives



2010 Hazardous Liquid State Program Evaluation -- CY 2010  
Hazardous Liquid

**State Agency:** Mississippi  
**Agency Status:**  
**Date of Visit:** 04/11/2011 - 06/13/2011  
**Agency Representative:** Mark McCarver, Director Pipeline Safety  
**PHMSA Representative:** Don Martin and Dale Bennett  
**Commission Chairman to whom follow up letter is to be sent:**  
**Name/Title:** Lynn Posey, Chairman  
**Agency:** Mississippi Public Service Commission  
**Address:** 501 North West Street, Suite 201A  
**City/State/Zip:** Jackson, Mississippi 39201

**INSTRUCTIONS:**

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2010 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. 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 space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual certification/agreement attachments provide the basis for determining the state's pipeline safety grant allocation.

**Field Inspection (PART F):**

The field inspection form used will allow different areas of emphasis to be considered for each question. Question 13 is provided for scoring field observation areas. In completing PART F, the PHMSA representative should include a written summary which thoroughly documents the inspection.

**Scoring Summary**

<b>PARTS</b>	<b>Possible Points</b>	<b>Points Scored</b>
A General Program Qualifications	26	23
B Inspections and Compliance - Procedures/Records/Performance	19	19
C Interstate Agent States	0	0
D Accident Investigations	2.5	2.5
E Damage Prevention Initiatives	9	8
F Field Inspection	12	12
G PHMSA Initiatives - Strategic Plan	10	10
H Miscellaneous	3	3
I Program Initiatives	9	9
<b>TOTALS</b>	<b>90.5</b>	<b>86.5</b>
<b>State Rating</b> .....		<b>95.6</b>

# PART A - General Program Qualifications

Points(MAX) Score

<b>1</b>	Did the state submit complete and accurate information on the attachments to its most current 60105(a) Certification/60106 (a) Agreement? (NOTE: PHMSA Representative to verify certification/agreement attachments by reviewing appropriate state documentation. Score a deficiency in any one area as "needs improvement". Attachment numbers appear in parenthesis) Previous Question A.1, Items a-h worth 1 point each Yes = 8 No = 0 Needs Minor Improvement = 3-7 Needs Major Improvement = 2	8	8
	a. State Jurisdiction and agent status over Hazardous Liquid and CO2 facilities (1)		<input checked="" type="checkbox"/>
	b. Total state inspection activity (2)		<input checked="" type="checkbox"/>
	c. Hazardous Liquid facilities subject to state safety jurisdiction (3)		<input checked="" type="checkbox"/>
	d. Hazardous Liquid pipeline incidents (4)		<input checked="" type="checkbox"/>
	e. State compliance actions (5)		<input checked="" type="checkbox"/>
	f. State record maintenance and reporting (6)		<input checked="" type="checkbox"/>
	g. State employees directly involved in the Hazardous Liquid pipeline safety program (7)		<input checked="" type="checkbox"/>
	h. State compliance with Federal requirements (8)		<input checked="" type="checkbox"/>

**SLR Notes:**

No information was found to be inaccurate based upon the review of office records.

<b>2</b>	Did the state have an adequate mechanism to receive operator reporting of incidents to ensure state compliance with 60105(a) Certification/60106(a) Agreement requirements (accident criteria as referenced in 195.50? - Mechanism should include receiving "after hours" reports) (Chapter 6) Previous Question A.2 Yes = 1 No = 0	1	1
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**SLR Notes:**

The MPSC maintains electronic logging of incidents. A file is created when an incident is reported. A file is created in the report filing system on the MPSC's computer network drive. There were no reportable incidents reported by operators in 2010.

<b>3</b>	Has the state held a pipeline safety T & Q seminar(s) in the last 3 years? (NOTE: Indicate date of last seminar or if state requested seminar, but T&Q could not provide, indicate date of state request for seminar. Seminars must be held at least once every 3 calendar years.) (Chapter 8.5) Previous Question A.5 Yes = 2 No = 0	2	2
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**SLR Notes:**

Yes. The MPSC participates with the Louisiana Department of Natural Resources to conduct an annual seminar for hazardous liquid pipeline operators.

<b>4</b>	Were pipeline safety program files well-organized and accessible?(NOTE: This also includes electronic files) (Chapter 5) Previous Question A.6 Yes = 1 No = 0	1	1
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**SLR Notes:**

Yes. The file systems were well organized and easy to access for conducting the program evaluation.

<b>5</b>	Did state records and discussions with the state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? (Chapter 4.1, Chapter 8.1) Previous Question A.7 Yes = 2 No = 0 Needs Improvement = 1	2	2
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**SLR Notes:**

Mr. McCarver is knowledgeable of pipeline safety regulations and the requirements for a state pipeline safety program outlined in the Guidelines For A State Pipeline Safety Program.

<b>6</b>	Did the state respond in writing within 60 days to the requested items in the Chairman's letter following the Region's last program evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.9 Yes = 1 No = 0	1	1
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**SLR Notes:**

The response was received within 60 days.

<b>7</b>	What actions, if necessary, did the State initiate as a result of issues raised in the Chairperson's letter from the previous year? Did actions correct or address deficiencies from previous year's evaluation? (Chapter 8.1) Previous Question A.10 Yes = 1 No = 0	1	1
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**SLR Notes:**

## Personnel and Qualifications

- |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |   |   |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <b>8</b> | Has each inspector fulfilled the 3 year T&Q training requirement? If No, has the state been granted a waiver regarding T&Q courses by the Associate Administrator for Pipeline Safety? (NOTE: If the State has new inspectors who have not attended all T&Q courses, but are in a program which will achieve the completion of all applicable courses within 3 years of taking first course (5 years to successfully complete), or if a waiver has been granted by the applicable Region Director for the state, please answer yes.) (Chapter 4.4) Previous Question A.11<br>Yes = 3 No = 0 | 3 | 0 |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

**SLR Notes:**

The MPSC has assigned four inspectors to the Hazardous Liquid Program (see Attachment 7). The inspectors are Lyla Carnley, Michael Sharp, Wiley Walker and Neil Wood. Lyla Carnley has not attended or successfully completed the required training within the three year or five year deadlines. All others have completed or is progressing within the timeframe given.

- |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                          |           |           |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|
| <b>9</b> | Brief Description of Non-T&Q training Activities<br>Info Only = No Points<br><br>For State Personnel:<br>All inspectors attended the Mississippi Natural Gas Association annual conference training courses during 2010.<br><br>For Operators:<br>None in 2010.<br><br>For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:<br>Participated with Mississippi 811 in Mississippi Damage Prevention Summit (Regional CGA event). | Info Only | Info Only |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|

**SLR Notes:**

See notes above.

- |           |                                                                                                                                                                                           |   |   |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <b>10</b> | Did the lead inspectors complete all required T&Q OQ courses and Computer Based Training (CBT) before conducting OQ Inspections? (Chapter 4.4.1) Previous Question A.13<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

**SLR Notes:**

Upon a review of the OQ database and training records, the inspectors assigned to lead OQ inspections completed the required training prior to the time inspections were conducted.

- |           |                                                                                                                                                                                                   |   |   |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <b>11</b> | Did the lead inspectors complete all required T&Q Integrity Management (IMP) Courses/Seminars and CBT before conducting IMP Inspections? (Chapter 4.4.1) Previous Question A.14<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

**SLR Notes:**

From information entered into Attachment 7 of the 2011 Agreement Document, Michael Sharp and Wiley Walker have completed the required courses.

- |           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |   |   |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <b>12</b> | Was the ratio acceptable of Total inspection Person-days to Total Person-days charged to the program by state inspectors? (Region Director may modify points for just cause) (Chapter 4.3) Previous Question B.14<br>Yes = 5 No = 0<br><br>A. Total Inspection Person Days (Attachment 2):<br><br>B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):<br><br>Ratio: A / B<br><br>If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0 | 5 | 5 |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

**SLR Notes:**

The MPSC experienced 20 Inspection Person Days during 2010. 220 times 0.15 person years (from Attachment 7) equals 33. 20 divided by 33 results in a ratio of 0.61 which is greater than the minimum ratio required of 0.38.

- |           |                                                                                                                                                    |           |           |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|
| <b>13</b> | Have there been modifications or proposed changes to inspector-staffing levels? (If yes, describe) Previous Question B.13<br>Info Only = No Points | Info Only | Info Only |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|

**SLR Notes:**

There were no changes to the inspector staffing levels during 2010.

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**14** Part-A General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

**SLR Notes:**

Question A.8 - The MPSC has assigned four inspectors to the Hazardous Liquid Program (see Attachment 7). The inspectors are Lyla Carnley, Michael Sharp, Wiley Walker and Neil Wood. Lyla Carnley has not attended or successfully completed the required training within the three year or five year deadlines. All others have completed or is progressing within the timeframe given.

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Total points scored for this section: 23  
Total possible points for this section: 26



# PART B - Inspections and Compliance - Procedures/Records/ Performance

Points(MAX) Score

## Inspection Procedures

- 1** Does the State have a written inspection plan to complete the following? (all types of operators) (Chapter 5.1) Previous Question B.1 + Chapter 5 Changes 6.5 6.5  
Yes = 6.5 No = 0 Needs Improvement = 50% Deduction
- a Standard Inspections (Including LNG) (Max points = 2) Yes  No  Needs Improvement
  - b IMP Inspections (Including DIMP) (Max points = .5) Yes  No  Needs Improvement
  - c OQ Inspections (Max points = .5) Yes  No  Needs Improvement
  - d Damage Prevention (Max points = .5) Yes  No  Needs Improvement
  - e On-Site Operator Training (Max points = .5) Yes  No  Needs Improvement
  - f Construction Inspections (Max points = .5) Yes  No  Needs Improvement
  - g Incident/Accident Investigations (Max points = 1) Yes  No  Needs Improvement
  - h Compliance Follow-up (Max points = 1) Yes  No  Needs Improvement

**SLR Notes:**

Inspection plan addresses all of the concerns above.

- 2** Did the written Procedures for selecting operators adequately address key concerns? (Chapter 5.1) Previous Question B.2, items a-d are worth .5 point each 2 2  
Yes = 2 No = 0 Needs Improvement = 50% Deduction
- a Length of time since last inspection Yes  No  Needs Improvement
  - b History of Operator/unit and/or location (including leakage , incident and compliance history) Yes  No  Needs Improvement
  - c Type of activity being undertaken by operator (construction etc) Yes  No  Needs Improvement
  - d For large operators, rotation of locations inspected Yes  No  Needs Improvement

**SLR Notes:**

The MPSC utilizes the concerns above in addition to the relative risk ranking model that it utilizes to identify key risks.

## Inspection Performance

- 3** Did the state inspect all types of operators and inspection units in accordance with time intervals established in its written procedures? (Chapter 5.1) Previous Question B.3 2 2  
Yes = 2 No = 0

**SLR Notes:**

Records kept by the MPSC indicated that it had complied with its inspection frequency procedures during 2010.

- 4** Did the state inspection form cover all applicable code requirements addressed on the Federal Inspection forms? (Chapter 5.1 (3)) Previous Question B.5 1 1  
Yes = 1 No = 0

**SLR Notes:**

The MPSC uses the federal inspection forms for all inspections except for construction inspections. The MPSC developed its own construction inspection form. Upon a review of the form, it appears to cover all items covered on the federal construction inspection form.

- 5** Did state complete all applicable portions of inspection forms? (Chapter 5.1 (3)) Previous Question B.6 1 1  
Yes = 1 No = 0

**SLR Notes:**

Upon a review of randomly selected inspection reports, all applicable questions on the forms were completed indicating results.

- 6** Did the state initiate appropriate follow-up actions to Safety Related Condition Reports? (Chapter 6.3) Previous Question B.7 .5 NA  
Yes = .5 No = 0

**SLR Notes:**



There were no safety related conditions reported by intrastate natural gas operators during 2010.

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<b>7</b>	Did the state review operator procedures for determining areas of active corrosion on liquid lines in sufficient detail? (NOTE: PHMSA representative to describe state criteria for determining areas of active corrosion) Previous Question B.8 Yes = .5 No = 0	.5	0.5
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**SLR Notes:**

Yes. The MPSC reviews this issue when conducting an operator headquarter's inspection which covers operation and maintenance of the operator. The MPSC also provides a listing of advisory bulletins to operators when conducting standard inspections.

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<b>8</b>	Did the state adequately review for compliance operator procedures for abandoning pipeline facilities and analyzing pipeline accidents to determine their causes? (NOTE: PHMSA representative to describe state criteria for determining compliance with abandoning pipeline facilities and analyzing pipeline accidents to determine their causes) Previous Question B.9 Yes = .5 No = 0	.5	0.5
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**SLR Notes:**

Yes. These concerns are addressed during the MPSC's annual operation and maintenance procedures review.

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<b>9</b>	Is the state aware of environmentally sensitive areas traversed by or adjacent to hazardous liquid pipelines? (reference Part 195, review of NPMS) Previous Question B.16 Yes = .5 No = 0	.5	0.5
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**SLR Notes:**

The MPSC discusses environmentally sensitive areas with the Mississippi Department of Environmental Quality. The MPSC uses this resource to confirm that operators have these areas noted in their Integrity Management Program.

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<b>10</b>	Did the state review 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(c)(5)? Previous Question B.11 Yes = 1 No = 0	1	1
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**SLR Notes:**

The MPSC covers 195.402(c)(5) requirements when it conducts standard inspections of operators. The MPSC reviews operator's response times when reviewing operator's leak repair records.

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## Compliance - 60105(a) States

<b>11</b>	Did the state adequately document sufficient information on probable violations? (Chapter 5.2) Previous Question B.13 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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**SLR Notes:**

There were no probable violations found during 2010.

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<b>12</b>	Does the state have written procedures to identify the steps to be taken from the discovery to the resolution of a probable violation as specified in the "Guidelines for State Participating in the Pipeline Safety Program"? (Chapter 5.1) Previous Question C(1).1 Yes = 1 No = 0 Needs Improvement = .5	1	1
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**SLR Notes:**

The MPSC office procedures describe the steps to be taken until the probable violations are corrected. The MPSC issues a non-compliance notification to an operator when a probable violation is found. An operator is given 30 days to respond to the notice. Followup inspections are conducted to monitor the progress of corrective actions. Operators are given the opportunity to provide information showing that a probable violation did not occur or an opportunity to request a hearing before the Commissioners to argue that a probable violation did not occur.

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<b>13</b>	Does the state have written procedures to notify an operator when a noncompliance is identified as specified in the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(4)) Previous Question C(1).2 Yes = 1 No = 0 Needs Improvement = .5	1	1
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**SLR Notes:**

The MPSC's office procedures state that a written non compliance notification is sent to an operator whenever a probable violation is identified. Operators are given 30 days to respond.

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<b>14</b>	Does the state have a written procedure for routinely reviewing the progress of compliance actions to prevent delays or breakdowns of the enforcement process, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(5)) Previous Question C(1).3 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

The MPSC's procedures state that follow up inspections will be scheduled after written notification of probable violation has been sent to an operator.

<b>15</b>	Has the State issued compliance actions for all probable violations discovered? (Note : PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation) Previous Question C(1).4 Yes = 1 No = 0	1	NA
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SLR Notes:

There were no probable violations found during 2010.

<b>16</b>	Did the state follow its written procedures for reviewing compliance actions and follow-up to determine that prompt corrective actions were taken by operators, within the time frames established by the procedures and compliance correspondence, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? Previous Question C(1).5 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

There were no probable violations found during 2010.

<b>17</b>	If compliance could not be established by other means, did state pipeline safety program staff request formal action, such as a "Show Cause Hearing" to correct pipeline safety violations? (check each states enforcement procedures) Previous Question C(1).6 No = 0 Yes = 1	1	NA
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SLR Notes:

There were no probable violations found during 2010.

<b>18</b>	Did the state adequately document the resolution of probable violations? (Chapter 5.1 (6)) Previous Question C(1).7 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

The MPSC documented the resolution of probable violations found prior to 2010 but were followed up on during 2010. There were no probable violations found during 2010.

<b>19</b>	Were compliance actions sent to a company officer? (manager or board member if municipal/government system) (Chapter 5.1(4)) Previous Question C(1).8 Yes = .5 No = 0	.5	NA
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SLR Notes:

There were no probable violations found during 2010.

<b>20</b>	Did the compliance proceedings give reasonable due process to all parties? (check each states enforcement procedures) Previous Question C(1).9 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

There were no probable violations found during 2010.

### Compliance - 60106(a) States

<b>21</b>	Did the state use the current federal inspection form(s)? Previous Question C(2).1 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

<b>22</b>	Are results adequately documented demonstrating inspection units were reviewed in accordance with state inspection plan? Previous Question C(2).2 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

<b>23</b>	Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) Previous Question C(2).3 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

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**24** Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question C(2).4 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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**25** Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question C(2).5 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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**26** Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? Previous Question D(2).6 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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**27** Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken) Info Only NA  
Info Only = No Points

SLR Notes:

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**28** Part B: General Comments/Regional Observations Info Only NA  
Info Only = No Points

SLR Notes:

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Total points scored for this section: 19  
Total possible points for this section: 19



# PART C - Interstate Agent States

Points(MAX) Score

**1** Did the state use an inspection form that was approved by the Regional Director? Previous Question C(3).1 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

The MPSC is not an interstate agent.

**2** Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? Previous Question C(3).2 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

The MPSC is not an interstate agent.

**3** Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? Previous Question C(3).3 1 NA  
Yes = 1 No = 0

SLR Notes:

The MPSC is not an interstate agent.

**4** Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) Previous Question C(3).4 1 NA  
Yes = 1 No = 0

SLR Notes:

The MPSC is not an interstate agent.

**5** Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question C(3).5 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

The MPSC is not an interstate agent.

**6** Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question C(3).6 1 NA  
Yes = 1 No = 0

SLR Notes:

The MPSC is not an interstate agent.

**7** Did the state initially submit documentation to support compliance action by PHMSA on probable violations? Previous Question C(3).7 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

The MPSC is not an interstate agent.

**8** Part C: General Comments/Regional Observations Info Only Info Only  
Info Only = No Points

SLR Notes:

The MPSC is not an interstate agent.

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



# PART D - Accident Investigations

Points(MAX) Score

**1** Are state personnel following the procedures for Federal/State cooperation in case of an accident? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6.1) Previous Question D.1  
 Yes = 1 No = 0 Needs Improvement = .5

**SLR Notes:**

Yes. The MPSC has followed the procedures contained in the Guidelines detailing the procedures and expectations for cooperation; however, there were no reportable incidents during 2010.

**2** Are state personnel familiar with the jurisdictional authority and Memorandum of Understanding between NTSB and PHMSA? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6 ? Appendix D) Previous Question D.2  
 Yes = .5 No = 0

**SLR Notes:**

Yes. The MPSC exhibited knowledge of the cooperation statements contained in the MOU between PHMSA and the NTSB. There were no incident investigations in 2010 whereby the MOU was needed.

**3** Did the state keep adequate records of accident notifications received? Previous Question D.3  
 Yes = 1 No = 0 Needs Improvement = .5

**SLR Notes:**

The MPSC kept records of incidents that met state reporting requirements; however, there were incidents during 2010 that met federal reporting requirements.

**4** If an onsite investigation of an accident was not made, did the state obtain sufficient information by other means to determine the facts and support the decision not to go on-site? Previous Question D.4  
 Yes = 1 No = 0 Needs Improvement = .5

**SLR Notes:**

There were no incidents in 2010 that met federal reporting requirements.

**5** Were investigations thorough and conclusions and recommendations documented in an acceptable manner? Previous Question D.5, , comprehensive question worth 2 points total  
 Yes = 2 No = 0 Needs Improvement = 1

- a. Observations Yes  No  Needs Improvement
- b. Contributing factors Yes  No  Needs Improvement
- c. Recommendations to prevent recurrences where appropriate Yes  No  Needs Improvement

**SLR Notes:**

There were no incidents in 2010 that met federal reporting requirements.

**6** Did the state initiate enforcement action for violations found during any accident investigation(s)? Previous Question D.6 Variation  
 Yes = 1 No = 0 Needs Improvement = .5

**SLR Notes:**

There were no incidents in 2010 that met federal reporting requirements.

**7** Did the state assist region office by taking appropriate follow-up actions related to the operator accident (and forward to PHMSA within 10 Days per 195.58) reports to ensure accuracy and final report has been received by PHMSA? (validate annual report data from operators concerning incidents/accidents and investigate discrepancies) (Chapter 6) Previous Question D.7/D.8 and A.4  
 Yes = .5 No = 0

**SLR Notes:**

There were no incidents in 2010 that met federal reporting requirements.

**8** Part D: General Comments/Regional Observations Info Only Info Only  
 Info Only = No Points

**SLR Notes:**



There were no incidents in 2010 that met federal reporting requirements.

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Total points scored for this section: 2.5  
Total possible points for this section: 2.5



# PART E - Damage Prevention Initiatives

Points(MAX) Score

- |          |                                                                                                                                                                                                                                                                                                                  |   |   |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <b>1</b> | Has the state reviewed 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? Previous Question B.12<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

**SLR Notes:**

Yes. Operator's procedures are reviewed annually. The MPSC has verified that operators have included directional/boring procedures in their Operation and Maintenance Procedures.

- |          |                                                                                                                                                                                                                                                        |   |   |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <b>2</b> | Did the state inspector check to assure the pipeline operator is following its written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? New 2008<br>Yes = 2 No = 0 | 2 | 2 |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

**SLR Notes:**

Yes. Operators' procedures are reviewed annually. During standard inspections, the MPSC verifies that operators follow through with their damage prevention programs required by Part 195.

- |          |                                                                                                                                                                                                                                                               |   |   |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <b>3</b> | Did the state encourage and promote the adoption of the Common Ground Alliance Best Practices document to its regulated companies as a means of reducing damages to all underground facilities? Previous Question A.8<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

**SLR Notes:**

Yes. The MPSC includes an item on its standard inspection form that initiates a discussion of best practices with operators.

- |          |                                                                                                                                                                                     |   |   |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <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? New 2008<br>Yes = 1 No = 0 | 1 | 0 |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

**SLR Notes:**

The MPSC did not collect this information or initiate trending of the information. 1.0 points could not be given for this requirement. The MPSC is going to start using the information that is now required on operators' annual report forms. The MPSC has revised its database to incorporate this information and establish trends in the future.

- |          |                                                                                                                                                                                                                                 |   |   |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <b>5</b> | Did the state review operators' records of accidents and failures due to excavation damage to ensure causes of failure are addressed to minimize the possibility of recurrence as required by 195.402 (c)(5)?<br>Yes = 2 No = 0 | 2 | 2 |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

**SLR Notes:**

Yes. During its standard inspections, the MPSC reviews operator's records on leaks and failures during its review of operator's records documenting compliance with 195.402 (c)(5).

- |          |                                                                         |           |           |
|----------|-------------------------------------------------------------------------|-----------|-----------|
| <b>6</b> | Part E: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|----------|-------------------------------------------------------------------------|-----------|-----------|

**SLR Notes:**

Question E.4 - The MPSC did not collect this information or initiate trending of the information. 1.0 points could not be given for this requirement.

Total points scored for this section: 8  
Total possible points for this section: 9



# PART F - Field Inspection

Points(MAX) Score

**1** Operator, Inspector, Location, Date and PHMSA Representative Info Only Info Only  
Info Only = No Points  
Name of Operator Inspected:  
Genesis Pipeline  
Name of State Inspector(s) Observed:  
Mike Sharp  
Location of Inspection:  
Soso Station to Liberty Station  
Date of Inspection:  
05/04/2011  
Name of PHMSA Representative:  
Dale Bennett

**SLR Notes:**

On May 4, 2011, Mike Sharp performed a filed inspection on Genesis Pipeline from Soso Stateion to Liberty Station

---

**2** Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? New 2008 1 1  
Yes = 1 No = 0

**SLR Notes:**

Genesis Pipeline was notified of the planned inspection in March 2010.

---

**3** Did the inspector use an acceptable inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) Previous Question E.2 2 2  
Yes = 2 No = 0

**SLR Notes:**

The inspector used PHMSA'S inspection checklist form for hazardous liquid pipelines.

---

**4** Did the inspector thoroughly document results of the inspection? Previous Question E.3 2 2  
Yes = 2 No = 0

**SLR Notes:**

The inspector marked the appropriate blocks for each requirement on the federal inspection form.

---

**5** Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps, valve keys, half-cells, etc.) New 2008 1 1  
Yes = 1 No = 0

**SLR Notes:**

The inspector reviewed the operator's test equipment that he used in the field.

---

**6** What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc) New 2008 Info Only Info Only  
Info Only = No Points

**SLR Notes:**

The inspector's conducted a standard inspection of Genesis Pipeline's operation and maintenance field activities.

---

**7** Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) New 2008, comprehensive question worth 2 points total 2 2  
Yes = 2 No = 0 Needs Improvement = 1

- a. Procedures
- b. Records
- c. Field Activities/Facilities
- d. Other (Please Comment)

**SLR Notes:**



The inspectors compared the procedures to the field activities.

---

<b>8</b>	Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Liaison will document reasons if unacceptable) Previous Question E.8 Yes = 2 No = 0	2	2
----------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---	---

SLR Notes:

The inspectors exhibited excellent knowledge of the requirements in 49CFRPart 195 which as applicable for this inspection.

---

<b>9</b>	Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) Previous Question E.10 Yes = 1 No = 0	1	1
----------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---	---

SLR Notes:

The inspectors conducted an exit interview with the operator upon completion of their inspection.

---

<b>10</b>	During the exit interview, did the inspector identify probable violations found during the inspections? Previous Question E.11 Yes = 1 No = 0	1	1
-----------	--------------------------------------------------------------------------------------------------------------------------------------------------	---	---

SLR Notes:

The inspectors reviewed the results of the inspection conducted on this day.

---

<b>11</b>	What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) Info Only = No Points	Info Only	Info Only
-----------	-------------------------------------------------------------------------------------------------------------------------------------------------	-----------	-----------

SLR Notes:

This was a field inspection of the receivers, pumps, launchers and several sections of the pipeline ROW on Genesis Pipelines. Excellent inspections were performed by Mr Sharp.

---

<b>12</b>	Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) Info Only = No Points	Info Only	Info Only
-----------	--------------------------------------------------------------------------------------------------------------------------------------------	-----------	-----------

SLR Notes:

There were no best practices identified that warrant communicating.

---

<b>13</b>	Field Observation Areas Observed (check all that apply) Info Only = No Points	Info Only	Info Only
-----------	----------------------------------------------------------------------------------	-----------	-----------

- a. Abandonment
- b. Abnormal Operations
- c. Break-Out Tanks
- d. Compressor or Pump Stations
- e. Change in Class Location
- f. Casings
- g. Cathodic Protection
- h. Cast-iron Replacement
- i. Damage Prevention
- j. Deactivation
- k. Emergency Procedures
- l. Inspection of Right-of-Way
- m. Line Markers
- n. Liaison with Public Officials
- o. Leak Surveys
- p. MOP
- q. MAOP
- r. Moving Pipe
- s. New Construction
- t. Navigable Waterway Crossings



- u. Odorization
- v. Overpressure Safety Devices
- w. Plastic Pipe Installation
- x. Public Education
- y. Purging
- z. Prevention of Accidental Ignition
- A. Repairs
- B. Signs
- C. Tapping
- D. Valve Maintenance
- E. Vault Maintenance
- F. Welding
- G. OQ - Operator Qualification
- H. Compliance Follow-up
- I. Atmospheric Corrosion
- J. Other

**SLR Notes:**

This was a field inspection of the receivers, pumps, valves, cathodic protection, line markers, signs, launchers and several sections of the pipeline ROW on Genesis Pipelines.

**14** Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

**SLR Notes:**

Mr Sharp performed a thorough review of comparing the operators procedures to the field. He conducted himself in a professional manner and treated the operator with respect. He exhibited a good understanding of the pipeline safety regulations.

Total points scored for this section: 12  
 Total possible points for this section: 12



# PART G - PHMSA Initiatives - Strategic Plan

Points(MAX) Score

## Risk base Inspections - Targeting High Risk Areas

**1** Does state have process to identify high risk inspection units? 1.5 1.5  
Yes = 1.5 No = 0

Risk Factors (criteria) to consider may include:

Miles of HCA's, Geographic area, Population Density

Length of time since last inspection

History of Individual Operator units (leakage, incident and compliance history, etc.)

Threats - (Excavation Damage, Corrosion, Natural Forces, Other Outside Forces, Material or Welds, Equipment, Operations, Other)

### SLR Notes:

During 2010, the MPSC implemented a risk based evaluation process to relatively rank inspection units. The MPSC uses the risk factors above in addition to others.

**2** Are inspection units broken down appropriately? (see definitions in Guidelines) .5 0.5  
Yes = .5 No = 0

### SLR Notes:

Yes. The inspection units are broken into units as described in the "Guidelines For States Participating in the Pipeline Safety Program" (Guideline).

**3** Does state inspection process target high risk areas? .5 0.5  
Yes = .5 No = 0

### SLR Notes:

The MPSC has implemented a process to evaluate risk of inspection units relative to each other. The process can identify high risk areas within each unit.

## Use of Data to Help Drive Program Priority and Inspections

**4** Does state use data to analyze effectiveness of damage prevention efforts in the state? (DIRT or other data, etc) .5 0.5  
Yes = .5 No = 0

### SLR Notes:

The MPSC reviews data from non-compliance issues from inspections and operator data related to damages to pipelines. The MPSC reviews data contained in CGA's DIRT system.

**5** Has state reviewed data on Operator Annual reports for accuracy? .5 0.5  
Yes = .5 No = 0

### SLR Notes:

The MPSC requires that operators provide it with a copy of its Annual Reports submission to PHMSA each year. The MPSC reviews the information for accuracy and comparison to the previous year report. The operators are informed of any inconsistencies found during the reviews.

**6** Has state analyzed annual report data for trends and operator issues? .5 0.5  
Yes = .5 No = 0

### SLR Notes:

The MPSC monitors the leak repairs by each operator and the total within the state of Mississippi.

**7** Has state reviewed data on Incident/Accident reports for accuracy? .5 0.5  
Yes = .5 No = 0

### SLR Notes:

Yes. The MPSC reviews data on incident reports to ensure that the reports are complete (supplemental or final), and that the operator's stated cause of the spill is reasonable and is consistent with the MPSC's investigation. There have not been any accidents since 2009.

**8** Does state do evaluation of effectiveness of program based on data? (i.e. performance measures,trends,etc.) .5 0.5  
Yes = .5 No = 0

### SLR Notes:

The MPSC reviews data on Annual reports from operators. The MPSC reviews accident history and the number of leak repairs shown in the Annual Reports then compares to previous years.

---

**9** Did the State input all operator qualification inspection results into web based database provided by PHMSA in a timely manner upon completion of OQ inspections? .5 0.5  
Yes = .5 No = 0

**SLR Notes:**

The MPSC continues to upload the results of inspections on operator's performance related to their plans as documented on Protocol 9 forms.

---

**10** Did the State submit their replies into the Integrity Management Database (IMDB) in response to the Operators notifications for their integrity management program? .5 0.5  
Yes = .5 No = 0

**SLR Notes:**

All notifications were provided a response.

---

**11** Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17 .5 0.5  
Yes = .5 No = 0

**SLR Notes:**

The results of approximately six HL IMP inspections have been uploaded but were found in the Gas IMP Database not the HL IMP database. The MPSC should consult with Cycla to have this information uploaded into the HL IMP database.

---

**12** Did the State use the Federal Protocols to conduct IMP Inspections? (If the State used an alternative inspection form(s) please provide information regarding alternative form(s)) Previous Question C(2).6 .5 0.5  
Yes = .5 No = 0

**SLR Notes:**

The MPSC utilizes the Liquid Pipeline IMP protocols to conduct its IMP inspections.

---

**13** Has state confirmed transmission operators have submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submission? .5 0.5  
Yes = .5 No = 0

**SLR Notes:**

Yes. The operator is questioned as to whether they have made their submittals during standard inspections. The results are noted on the inspection forms.

---

## Accident/Incident Investigation Learning and Sharing Lessons Learned

**14** Has state shared lessons learned from incidents/accidents? (i.e. NAPSRS meetings and communications) .5 0.5  
Yes = .5 No = 0

**SLR Notes:**

The MPSC presented an update of its program at the NAPSRS Southern Region Meeting held in 2010.

---

**15** Does the State support data gathering efforts concerning accidents? (Frequency/Consequence/etc) .5 0.5  
Yes = .5 No = 0

**SLR Notes:**

The MPSC has not been contacted about a request for data related to accidents. The MPSC has cooperated with any requests from the Southern Region Office related to incidents reported to the National Response Center.

---

**16** Does state have incident/accident criteria for conducting root cause analysis? Info Only Info Only  
Info Only = No Points

**SLR Notes:**

Root cause analysis has not been incorporated as yet.

---

**17** Does state conduct root cause analysis on incidents/accidents in state? Info Only Info Only  
Info Only = No Points

**SLR Notes:**

Not at this time.

---

**18** Has state participated on root cause analysis training? (can also be on wait list) .5 0.5  
No = 0 Yes = .5

SLR Notes:

Wiley Walker completed the root cause training in 2009.

---

## Transparency - Communication with Stakeholders

**19** Other than pipeline safety seminar does State communicate with stakeholders? (Communicate program data, pub awareness, etc.) .5 0.5  
Yes = .5 No = 0

SLR Notes:

The MPSC participates in the Mississippi Damage Prevention Committee. The MPSC participates in Mississippi Gas Association meetings and conferences. Mark McCarver authors an article each month in the damage prevention magazine circulated in Mississippi. The MPSC participates in local Utility Coordinating Committee meetings.

---

**20** Does state share enforcement data with public? (Website, newsletters, etc.) .5 0.5  
Yes = .5 No = 0

SLR Notes:

The public has access to the MPSC docket system where enforcement cases seeking civil penalties or other Commission action is available. The MPSC also has live video streaming of its proceedings. The MPSC provides access to the Commission's website and the MPSC produces an Annual Report that is provided to the public.

---

**21** Part G: General Comments/Regional Observations Info Only Info Only  
Info Only = No Points

SLR Notes:

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



**PART H - Miscellaneous**

**Points(MAX) Score**

- 
- 1** What were the major accomplishments for the year being evaluated? (Describe the accomplishments, NAPSR Activities and Participation, etc.) Previous Question A.15 .5 0.5  
Yes = .5 No = 0

**SLR Notes:**

The MPSC participated in the Mississippi Damage Prevention Council meetings throughout the year working toward proposals to improve the damage prevention laws in the state. The MPSC used One Call Grant funds to provide locator training across the state.

---

- 2** What legislative or program initiatives are taking place/planned in the state, past, present, and future? (Describe initiatives (i.e. damage prevention, jurisdiction/authority, compliance/administrative, etc.) A.16 .5 0.5  
Yes = .5 No = 0

**SLR Notes:**

In its work with the Mississippi Damage Prevention Council, the MPSC is developing with all stakeholders proposed legislation to improve damage prevention and enforcement of the damage prevention law.

---

- 3** Any Risk Reduction Accomplishments/Projects? (i.e. Replacement projects,bare steel,third-party damage reductions, HCA's/USA mapping, internal corrosion, etc.) .5 0.5  
Yes = .5 No = 0

**SLR Notes:**

The MPSC is working with a stakeholder group to propose legislation to improve damage prevention laws and has taken steps to improve damage prevention such as managing grant funds to provide locator training across the state.

---

- 4** Did the state participate in/respond to surveys or information requests from NAPSR or PHMSA? 1 1  
Yes = 1 No = 0

**SLR Notes:**

The MPSC adequately responded to all requests that it received.

---

- 5** Sharing Best Practices with Other States - (General Program) .5 0.5  
Yes = .5 No = 0

**SLR Notes:**

The MPSC shared information with other states in NAPSR Meetings and initiatives.

---

- 6** Part H: General Comments/Regional Observations Info Only Info Only  
Info Only = No Points

**SLR Notes:**

The MPSC has generally complied with Part H of this evaluation.

---

Total points scored for this section: 3  
Total possible points for this section: 3



# PART I - Program Initiatives

Points(MAX) Score

## Drug and Alcohol Testing (49 CFR Part 199)

- |          |                                                                                                 |   |   |
|----------|-------------------------------------------------------------------------------------------------|---|---|
| <b>1</b> | Has the state verified that operators have drug and alcohol testing programs?<br>Yes = 1 No = 0 | 1 | 1 |
|----------|-------------------------------------------------------------------------------------------------|---|---|

SLR Notes:

Yes. The MPSC has completed the review of all operators' drug and alcohol testing programs and has followed up with reviews when Part 199 rules have been amended or operator's plans have been revised.

- |          |                                                                                                                                                                    |    |     |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|
| <b>2</b> | Is the state verifying that operators are conducting the drug and alcohol tests required by the operators program (random, post-incident, etc.)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|

SLR Notes:

Operators records are reviewed during standard inspections to verify random drug testing rates exceed 25 percent.

- |          |                                                                                                                               |    |     |
|----------|-------------------------------------------------------------------------------------------------------------------------------|----|-----|
| <b>3</b> | Is the state verifying that any positive tests are responded to in accordance with the operator's program?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|-------------------------------------------------------------------------------------------------------------------------------|----|-----|

SLR Notes:

When positive results are shown in an operator's records, the MPSC questions operators of the actions taken as a result of the positive test(s). The MPSC verifies if the operator complied with its procedures.

## Qualification of Pipeline Personnel (49 CFR Part 195 Subpart G)

- |          |                                                                                               |   |   |
|----------|-----------------------------------------------------------------------------------------------|---|---|
| <b>4</b> | Has the state verified that operators have a written qualification program?<br>Yes = 1 No = 0 | 1 | 1 |
|----------|-----------------------------------------------------------------------------------------------|---|---|

SLR Notes:

Upon a review of the OQ Database, the MPSC has completed the review of all operators' Operator Qualification Plans. The results of these inspections have been uploaded to PHMSA's OQ database.

- |          |                                                                                                                          |    |     |
|----------|--------------------------------------------------------------------------------------------------------------------------|----|-----|
| <b>5</b> | Has the state reviewed operator qualification programs for compliance with PHMSA rules and protocols?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--------------------------------------------------------------------------------------------------------------------------|----|-----|

SLR Notes:

PHMSA OQ Inspection Protocols cover PHMSA's OQ Rules. The MPSC utilized the protocol forms to inspect operators' OQ Plans. The protocol forms were uploaded into PHMSA's OQ database.

- |          |                                                                                                                                                            |    |     |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|
| <b>6</b> | Is the state verifying that persons who perform covered tasks for the operator are qualified in accordance with the operator's program?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|

SLR Notes:

The MPSC verifies that requalifications are performed within the timeframes established in the operator's OQ Plan as a part of its standard inspections. The MPSC also conducts Protocol 9 inspections.

- |          |                                                                                                                                                                        |    |     |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|
| <b>7</b> | Is the state verifying that persons who perform covered task for the operator are requalified at the intervals specified in the operator's program?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|

SLR Notes:

The MPSC verifies qualification records during its standard inspections to insure that operators are requalifying individuals according to the operators' requalification intervals outlined in their plans.

## Hazardous Liquid Pipeline Integrity Management (49 CFR Part 195.452)

- |          |                                                                                                                                                 |   |   |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <b>8</b> | Has the state verified that all operators with hazardous liquid pipelines have adopted an integrity management program (IMP)?<br>Yes = 1 No = 0 | 1 | 1 |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

SLR Notes:

The MPSC has completed Integrity Management Plan inspections for all operators that have gas transmission pipelines.

- |          |                                                                                                                                                                    |    |     |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|
| <b>9</b> | Has the state verified that in determining whether a plan is required, the operator properly applied the definition of a high consequence area?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|



SLR Notes:

The MPSC uses and completes all information in the integrity management protocol forms while conducting its inspections of Integrity Management Plans. The protocol form covers this requirement.

10 Has the state reviewed operator IMPs for compliance with 195.452? .5 0.5  
Yes = .5 No = 0

SLR Notes:

The MPSC uses the Integrity Management Plan inspection protocols while conducting its IMP inspections. The protocol forms covers the requirements in 195.452.

11 Is the state monitoring operator progress on the inspections, tests and remedial actions required by the operator's IMP, which includes the manner and schedule called for in its IMP? .5 0.5  
Yes = .5 No = 0

SLR Notes:

The MPSC has conducted these reviews.

12 Is the state verifying operators are periodically examining their hazardous liquid pipelines for the appearance of new HCAs? .5 0.5  
Yes = .5 No = 0

SLR Notes:

The MPSC completes the Integrity Management Inspection Protocols. The protocols cover this requirement.

Public Awareness (49 CFR Section 195.440)

13 Has the state verified that each operator has developed a continuing public awareness program (due date was 6/20/06 for most operators, 6/20/07 for certain very small operators)? .5 0.5  
Yes = .5 No = 0

SLR Notes:

Yes. The MPSC participated in the Public Awareness Clearinghouse review of operator's plans. The MPSC verified that all operators submitted their Public Awareness Plans within the timeframe prescribed by the regulations.

14 Has the state reviewed the content of these programs for compliance with 195.440 (by participating in the Clearinghouse or by other means)? .5 0.5  
Yes = .5 No = 0

SLR Notes:

The MPSC participated in the review conducted by the Public Awareness Clearinghouse. The MPSC reviewed the results submitted by the Clearinghouse. The MPSC followed up with operators on any deficiencies identified by the Clearinghouse.

15 Is the state verifying that operators are conducting the public awareness activities called for in its program? .5 0.5  
Yes = .5 No = 0

SLR Notes:

Yes. The MPSC reviews an operator's activity records when conducting standard inspections.

16 Is the state verifying that operators have evaluated their public awareness programs for effectiveness as described in RP1162? Info Only Info Only  
Info Only = No Points

SLR Notes:

The MPSC will be initiating these inspections in 2011 after completing the training and receiving PHMSA's inspection form.

17 Part I: General Comments/Regional Observations Info Only Info Only  
Info Only = No Points

SLR Notes:

The MPSC has generally complied with Part I of this evaluation.

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

