



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

1200 New Jersey Avenue SE
Washington DC 20590

2010 Natural Gas State Program Evaluation

for

MISSOURI 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 -- Incident Investigations
- E -- Damage Prevention Initiatives
- F -- Field Inspection
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2010 Natural Gas State Program Evaluation -- CY 2010
Natural Gas

State Agency: Missouri
Agency Status:
Date of Visit: 09/19/2011 - 09/23/2011
Agency Representative: Robert Leonberger
PHMSA Representative: Leonard Steiner
Commission Chairman to whom follow up letter is to be sent:
Name/Title: Kevin Gunn, Chairman
Agency: Missouri Public Service Commission
Address: 200 Madison Street, PO Box 360
City/State/Zip: Jefferson City, Missouri 65102-0360

Rating:
60105(a): Yes **60106(a):** No **Interstate Agent:** No

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

PARTS	Possible Points	Points Scored
A General Program Qualifications	26	25
B Inspections and Compliance - Procedures/Records/Performance	23.5	23.5
C Interstate Agent States	0	0
D Incident Investigations	6	6
E Damage Prevention Initiatives	9	9
F Field Inspection	12	12
G PHMSA Initiatives - Strategic Plan	9	8.5
H Miscellaneous	3	3
I Program Initiatives	9	9
TOTALS	97.5	96
State Rating		98.5

PART A - General Program Qualifications

Points(MAX) Score

1	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	7
	a. State Jurisdiction and agent status over gas facilities (1)	<input checked="" type="checkbox"/>	
	b. Total state inspection activity (2)	<input checked="" type="checkbox"/>	
	c. Gas facilities subject to state safety jurisdiction (3)	<input checked="" type="checkbox"/>	
	d. Gas pipeline incidents (4)	<input 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 gas pipeline safety program (7)	<input checked="" type="checkbox"/>	
	h. State compliance with Federal requirements (8)	<input checked="" type="checkbox"/>	

SLR Notes:

One incident had not been acknowledged on the certification.

2	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 (fatality, injury requiring hospitalization, property damage exceeding \$50,000 - 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:

3	Has the state held a pipeline safety TQ 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.4 Yes = 2 No = 0	2	2
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SLR Notes:

Yes, July 2010

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

Yes

5	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.6 Yes = 2 No = 0 Needs Improvement = 1	2	2
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SLR Notes:

Yes

6	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.8 Yes = 1 No = 0	1	1
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SLR Notes:

Yes

7	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? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8/A.9 Yes = 1 No = 0	1	1
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SLR Notes:

The Commission is continuing to have legislation for jurisdiction of Petroleum gas systems. Legislation for damage prevention has been developed but was not submitted by the Commission to the Legislature.

Personnel and Qualifications

- | | | | |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 8 | Has each inspector fulfilled the 3 year TQ training requirement? If No, has the state been granted a waiver regarding TQ courses by the Associate Administrator for Pipeline Safety? (NOTE: If the State has new inspectors who have not attended all TQ 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.10
Yes = 3 No = 0 | 3 | 3 |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

SLR Notes:

Yes

- | | | | |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|
| 9 | Brief Description of Non-TQ training Activities:
Info Only = No Points

For State Personnel:
Fire and Arson investigation Course

For Operators:
Assisted in presentation at the Missouri Association of Natural Gas Operators (MANGO) safety seminar.

For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:
Commission had information booth at State Fair, issued periodic press releases, and assisted with presentations at excavator meetings with the Missouri One-Call. | Info Only | Info Only |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|

SLR Notes:

- | | | | |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 10 | 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.12
Yes = 1 No = 0 | 1 | 1 |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

SLR Notes:

Yes

- | | | | |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 11 | Did the lead inspectors complete all required TQ Integrity Management (IMP) Courses/Seminars and CBT before conducting IMP Inspections? (Chapter 4.4.1) Previous Question A.13
Yes = 1 No = 0 | 1 | 1 |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

SLR Notes:

Commission has one inspector who has completed all required courses. It is recommended that additional inspectors complete the required courses.

- | | | | |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 12 | 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.12
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):
677.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 7.35 = 1617.00

Ratio: A / B
677.00 / 1617.00 = 0.42

If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0
Points = 5 | 5 | 5 |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

SLR Notes:

Yes

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

SLR Notes:



No modifications to authorized staff levels.

14 Part-A General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

Total points scored for this section: 25

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 including LNG) (Chapter 5.1) Previous Question B.1 + Chapter 5 Changes + Incorporate LNG
Yes = 6.5 No = 0 Needs Improvement = 50% Deduction 6.5 6.5
- | | | | | |
|---|-------------------------------------------------------|--------------------------------------|--------------------------|-----------------------------------------|
| a | Standard Inspections (Including LNG) (Max points = 2) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b | IMP Inspections (Including DIMP) (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c | OQ Inspections (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d | Damage Prevention (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e | On-Site Operator Training (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f | Construction Inspections (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| g | Incident/Accident Investigations (Max points = 1) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| h | Compliance Follow-up (Max points = 1) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

SLR Notes:

The inspection plans need to be clarified and refined.

- 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
Yes = 2 No = 0 Needs Improvement = 50% Deduction 2 2
- | | | | | |
|---|------------------------------------------------------------------------------------------------|--------------------------------------|--------------------------|-----------------------------------------|
| a | Length of time since last inspection | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b | History of Operator/unit and/or location (including leakage , incident and compliance history) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c | Type of activity being undertaken by operator (construction etc) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d | For large operators, rotation of locations inspected | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

SLR Notes:

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
Yes = 2 No = 0 2 2

SLR Notes:

Yes

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

No Safety Related Condition Reports were submitted in Missouri.



7	Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Previous Question B.7 Yes = .5 No = 0	.5	.5
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SLR Notes:

8	Did the state review 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) (NTSB) Previous Question B.8 Yes = .5 No = 0	.5	.5
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SLR Notes:

9	Did the state review 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? (NTSB) Previous Question B.9 Yes = .5 No = 0	.5	.5
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SLR Notes:

10	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 192.617? (NTSB) Previous Question B.10 Yes = 1 No = 0	1	1
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SLR Notes:

Compliance - 60105(a) States

11	Did the state adequately document sufficient information on probable violations? (Chapter 5.2) Previous Question B.14 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

Yes

12	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 D(1).1 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

13	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 D(1).2 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

Yes

14	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 D(1).3 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

Yes

15	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 D(1).4 Yes = 1 No = 0	1	1
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SLR Notes:

16	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 D(1).5 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

17	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 D(1).6 No = 0 Yes = 1	1	NA
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SLR Notes:

No "Show Cause" hearings were required.

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

The program manager sends a letter to the operator notifying that the probable violation has an adequate resolution.

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

Yes

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

Yes

Compliance - 60106(a) States

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

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

23	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 D(2).3 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

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 D(2).4 1 NA
Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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

SLR Notes:

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:

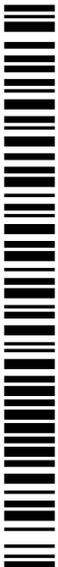
27 Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken) Info Only NA
Info Only = No Points

SLR Notes:

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

SLR Notes:

Total points scored for this section: 23.5
Total possible points for this section: 23.5



PART C - Interstate Agent States

Points(MAX) Score

1 Did the state use the current federal inspection form(s)? Previous Question D(3).1 1 NA
Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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 D(3).4 1 NA
Yes = 1 No = 0

SLR Notes:

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 D(3).5 1 NA
Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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



PART D - Incident Investigations

Points(MAX) Score

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

SLR Notes:
 Yes

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 E.2
 Yes = .5 No = 0

SLR Notes:

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

SLR Notes:
 Yes

4 If an onsite investigation of an incident 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 E.4
 Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:
 The determination is made by the program manager is an on-site investigation is needed.

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

- a. Observations and Document Review Yes No Needs Improvement
- b. Contributing Factors Yes No Needs Improvement
- c. Recommendations to prevent recurrences where appropriate Yes No Needs Improvement

SLR Notes:

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

SLR Notes:
 No probable violations were discovered.

7 Did the state assist region office by taking appropriate follow-up actions related to the operator incident 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 E.7/E.8
 Yes = .5 No = 0

SLR Notes:
 Yes

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

SLR Notes:



Total points scored for this section: 6
Total possible points for this section: 6



PART E - Damage Prevention Initiatives

Points(MAX) Score

- | | | | |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 1 | 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.11
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

SLR Notes:

Yes, on inspection form.

- | | | | |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 2 | 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
Yes = 2 No = 0 | 2 | 2 |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

SLR Notes:

Yes, Checks locate requests and the required markings.

- | | | | |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 3 | 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.7
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

SLR Notes:

Yes, Missouri participates on a Regional Common Ground Committee.

- | | | | |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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? New 2008
Yes = 1 No = 0 | 1 | 1 |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

SLR Notes:

Missouri has a state required annual report to be filed by the operators. It includes the data for pipeline damage.

- | | | | |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 5 | 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 192.617?
Yes = 2 No = 0 | 2 | 2 |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

SLR Notes:

Yes

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

SLR Notes:

Total points scored for this section: 9
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:
Ameren UE

Name of State Inspector(s) Observed:
Rick Fennell, Steve Fischer, Kathleen McNelis, Daniel Fitzpatrick

Location of Inspection:
Jefferson City, Missouri

Date of Inspection:
September, 21, 2010

Name of PHMSA Representative:
leonard Steiner

SLR Notes:

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:

Yes, in office checking of records.

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 F.2 2 2
Yes = 2 No = 0

SLR Notes:

Yes, a state developed form.

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

SLR Notes:

Yes

5 Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps, pyrometer, soap spray, CGI, etc.) New 2008 1 1
Yes = 1 No = 0

SLR Notes:

No special equipment, but all necessary records were available.

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:

Standard Inspection

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:



Mostly records were inspected, however, some welding procedures were inspected.

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

SLR Notes:

Yes, All inspectors were very knowledgeable.

9 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 F.10 1 1
Yes = 1 No = 0

SLR Notes:

Yes

10 During the exit interview, did the inspector identify probable violations found during the inspections? Previous Question F.11 1 1
Yes = 1 No = 0

SLR Notes:

No probable violations had been identified on this day of the inspection.

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

SLR Notes:

On September 21, 2010, I observed Rick Fennell, Steve Fischer, Kathleen McNelis and Daniel Fitzpatrick conduct a standard inspection of the Jefferson City, Missouri office of Ameren UE. Ameren UE is a pipeline operator that operates distribution and intrastate transmission pipelines in Missouri. This was one day of a multi-day inspection. All inspectors arrived at the arranged time. Each inspector know the area to be inspected and started upon arriving. The operator has appropriate personnel at provide records and answer questions for the inspectors. All inspectors were knowledgeable and courteous and conducted the inspection in a professional manner.

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

SLR Notes:

None noted

13 Field Observation Areas Observed (check all that apply) Info Only Info Only
Info Only = No Points

- 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:

Also conducted drug and alcohol inspection.

14 Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

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:

Yes, they used data from the required state annual report of operators.

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

SLR Notes:

Yes

- 3** Consideration of operators DIMP Plan? (if available and pending rulemaking) Info Only Info Only
Info Only = No Points

SLR Notes:

Missouri needs to develop procedures to inspect operator's DIMP procedures.

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

SLR Notes:

Yes

Use of Data to Help Drive Program Priority and Inspections

- 5** 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:

Missouri uses the data required on the Missouri state annual report of operators.

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

SLR Notes:

One inspector conducts the review of Annual Reports.

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

SLR Notes:

One inspector analyses of Annual Reports.

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

SLR Notes:

The PHMSA incident report is part of the investigation report for incidents.

9 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:

Yes, The trends from data submitted by operators on the Missouri state annual report is used to determine the effectiveness and the improvement of the Missouri pipeline safety program.

10 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? Previous Question B.15 .5 0
 Yes = .5 No = 0

SLR Notes:

No, Missouri has inspected OQ, especially Protocol 9, but have not used the PHMSA form and have not submitted the results into the PHMSA OQ database.

11 Did the State submit their replies into the Integrity Management Database (IMDB) in response to the Operators notifications for their integrity management program? Previous Question B.16 .5 NA
 Yes = .5 No = 0

SLR Notes:

No replies were required.

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

SLR Notes:

No IMP inspection were conducted.

13 Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns? Previous Question B.18 .5 0.5
 Yes = .5 No = 0

SLR Notes:

Yes

14 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

Accident/Incident Investigation Learning and Sharing Lessons Learned

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

SLR Notes:

Yes

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

SLR Notes:

Yes

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

SLR Notes:

Missouri needs to develop a criteria for conducting root cause analysis of incidents.

18 Does state conduct root cause analysis on incidents/accidents in state? Info Only Info Only



Info Only = No Points

SLR Notes:

No root cause analysis was conducted in CY 2010.

19 Has state participated on root cause analysis training? (can also be on wait list) .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes, two inspectors have completed the course.

Transparency - Communication with Stakeholders

20 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:

Missouri has annual press releases, supports radio ads for damage prevention and places safety messages on the Commission web site.

21 Does state share enforcement data with public? (Website, newsletters, docket access, etc.) .5 0.5

Yes = .5 No = 0

SLR Notes:

All docketed enforcement actions are on a web site.

22 Part G: General Comments/Regional Observations Info Only Info Only

Info Only = No Points

SLR Notes:

Total points scored for this section: 8.5
Total possible points for this section: 9



PART H - Miscellaneous

Points(MAX) Score

1 What were the major accomplishments for the year being evaluated? (Describe the accomplishments, NAPSRA Activities and Participation, etc.) .5 0.5
Yes = .5 No = 0

SLR Notes:

1. The Commission ordered 5 operators to conduct intense leakage surveys with state pipeline safety inspectors observing. 2. They conducted 2 round table workshops on damage prevention.

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.) .5 0.5
Yes = .5 No = 0

SLR Notes:

Pipeline Safety has developed a damage prevention rule that needs to be passed by the legislature. It has not been submitted but should be submitted to the legislature during the next session.

3 Any Risk Reduction Accomplishments/Projects? (i.e. Cast iron replacement projects, bare steel, third-party damage reductions, etc.) .5 0.5
Yes = .5 No = 0

SLR Notes:

One operator is replacing bad plastic pipe. One operator is replacing bare and unprotected services lines.

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

SLR Notes:

Yes

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

SLR Notes:

No specific best practices to share.

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

SLR Notes:

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)

1 Has the state verified that operators have drug and alcohol testing programs? 1 1
Yes = 1 No = 0

SLR Notes:

Yes

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

SLR Notes:

Yes, Missouri conducts inspections of drug and alcohol programs.

3 Is the state verifying that any positive tests are responded to in accordance with the operator's program? .5 0.5
Yes = .5 No = 0

SLR Notes:

Yes

Qualification of Pipeline Personnel (49 CFR Part 192 Subpart N)

4 Has the state verified that operators have a written qualification program? 1 1
Yes = 1 No = 0

SLR Notes:

Yes

5 Has the state reviewed operator qualification programs for compliance with PHMSA rules and protocols? .5 0.5
Yes = .5 No = 0

SLR Notes:

Yes

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

SLR Notes:

Yes, Missouri inspects employees that conduct covered tasks.

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

SLR Notes:

Yes

Gas Transmission Pipeline Integrity Management (49 CFR Part 192 Subpart O)

8 Has the state verified that all operators with transmission pipelines have either adopted an integrity management program (IMP), or have properly determined that one is not required? 1 1
Yes = 1 No = 0

SLR Notes:

Yes, They have identified the operators of transmission pipelines that have HCAs. The other operators should have an inspection with the completion of the Protocol A of the IM inspection form, and this form needs to be uploaded into the PHMSA IMDB.

9 Has the state verified that in determining whether a plan is required, the operator correctly calculated the potential impact radii and properly applied the definition of a high consequence area? .5 0.5
Yes = .5 No = 0

SLR Notes:



Yes

10	Has the state reviewed operator IMPs for compliance with Subpart O? (In accordance with State Inspection plan) Yes = .5 No = 0	.5	0.5
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SLR Notes:

Yes, One operator of a transmission pipeline needs to be inspected.

11	Is the state monitoring operator progress on the inspections, tests and remedial actions required by the operator's IMP, including that they are being done in the manner and schedule called for in its IMP? Yes = .5 No = 0	.5	0.5
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SLR Notes:

Yes

12	Is the state verifying that operators are periodically examining their transmission line routes for the appearance of new HCAs? Yes = .5 No = 0	.5	0.5
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SLR Notes:

Yes, Missouri has added this to their standard inspection form.

Public Awareness (49 CFR Section 192.616)

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, 6/13/08 for master meters) Yes = .5 No = 0	.5	0.5
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SLR Notes:

Yes

14	Has the state reviewed the content of these programs for compliance with 192.616 (by participating in the Clearinghouse or by other means)? Yes = .5 No = 0	.5	0.5
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SLR Notes:

Yes

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

Yes

16	Is the state verifying that operators have evaluated their Public Awareness programs for effectiveness as described in RP1162? Info Only = No Points	Info Only	Info Only
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SLR Notes:

Yes, Missouri requires a self evaluation report.

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

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