



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

1200 New Jersey Avenue SE
Washington DC 20590

2009 Hazardous Liquid State Program Evaluation

for

PENNSYLVANIA PUBLIC UTILITY 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



2009 Hazardous Liquid State Program Evaluation -- CY 2009
Hazardous Liquid

State Agency: Pennsylvania

Agency Status:

Date of Visit: 09/14/2010 - 09/15/2010

Agency Representative: Paul Metro

PHMSA Representative: Jim Anderson

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

Name/Title: James H. Cawley, Chairman

Agency: Pennsylvania Public Utility Commission

Address: P.O. Box 3265

City/State/Zip: Harrisburg, Pennsylvania 17105-3265

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 2009 (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	24	10
B	Inspections and Compliance - Procedures/Records/Performance	3	0
C	Interstate Agent States	0	0
D	Accident Investigations	3	3
E	Damage Prevention Initiatives	9	3
F	Field Inspection	12	12
G	PHMSA Initiatives - Strategic Plan	9.5	2
H	Miscellaneous	3	2
I	Program Initiatives	9	0

TOTALS **72.5 32**

State Rating **44.1**

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 | 6 |
| <hr/> | | | |
| a. | State Jurisdiction and agent status over Hazardous Liquid and CO2 facilities (1) | <input 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 type="checkbox"/> | |

SLR Notes:

PA PUC inspection activity consisted of one inspection day for CY 2009.

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|----------|--|---|---|
| 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 (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 |
|----------|--|---|---|

SLR Notes:

Yes . Operators have 24 hour contact information for inspectors.

- | | | | |
|----------|--|---|---|
| 3 | 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 | 0 |
|----------|--|---|---|

SLR Notes:

No.

- | | | | |
|----------|--|---|---|
| 4 | 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 |
|----------|--|---|---|

SLR Notes:

Yes. However only 1 inspection day was made for the entire year.

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

SLR Notes:

Yes. Paul Metro is the current NAPS Vice Chair and works closely with PHMSA.

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|----------|---|---|----|
| 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.9
Yes = 1 No = 0 | 1 | NA |
|----------|---|---|----|

SLR Notes:

None requested.

- | | | | |
|----------|---|---|----|
| 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? (Chapter 8.1) Previous Question A.10
Yes = 1 No = 0 | 1 | NA |
|----------|---|---|----|

SLR Notes:

None requested.

Personnel and Qualifications

- | | | | |
|----------|---|---|---|
| 8 | 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
Yes = 3 No = 0 | 3 | 0 |
|----------|---|---|---|

SLR Notes:

No.

- | | | | |
|----------|---|-----------|-----------|
| 9 | Brief Description of Non-T&Q training Activities
Info Only = No Points

For State Personnel:

For Operators:

For Non-Operator Entities/Parties, Information Dissemination, Public Meetings: | 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.13
Yes = 1 No = 0 | 1 | 0 |
|-----------|---|---|---|

SLR Notes:

No.

- | | | | |
|-----------|---|---|---|
| 11 | 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
Yes = 1 No = 0 | 1 | 0 |
|-----------|---|---|---|

SLR Notes:

No.

- | | | | |
|-----------|--|---|---|
| 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.14
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):
1.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 0.40 = 88.00

Ratio: A / B
1.00 / 88.00 = 0.01

If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0
Points = 0 | 5 | 0 |
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SLR Notes:

PA PUC only conducted 1 inspection day in CY 2009.

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

14 Part-A General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

Total points scored for this section: 10
Total possible points for this section: 24



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) 6.5 NA
Previous Question B.1 + Chapter 5 Changes
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:

60106 state.

- 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 NA
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:

60106 state.

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 NA
Yes = 2 No = 0

SLR Notes:

60106 state.

- 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 NA
Yes = 1 No = 0

SLR Notes:

60106 state.

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

SLR Notes:

No inspections conducted in 2009.

- 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:

None reported.

7	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	NA
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SLR Notes:

No inspections conducted.

8	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
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SLR Notes:

No inspections conducted in 2009.

9	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
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SLR Notes:

No.

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 195.402(c)(5)? Previous Question B.11 Yes = 1 No = 0	1	0
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SLR Notes:

No.

Compliance - 60105(a) States

11	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:

No inspections conducted.

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 C(1).1 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

60106 state.

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

60106 state.

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

60106 state.

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 C(1).4 Yes = 1 No = 0	1	NA
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SLR Notes:

60106 state.

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 C(1).5 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

60106 state.

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

60106 state.

18	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	NA
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SLR Notes:

60106 state.

19	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:

60106 state.

20	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:

60106 state.

Compliance - 60106(a) States

21	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:

Did not conduct any inspections in 2009 that required federal form.

22	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	0
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SLR Notes:

There is no liquid inspection plan.

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



No probable violations found.

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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
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|-----------|--|---|----|

SLR Notes:

No inspections were conducted in 2009.

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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
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|-----------|---|---|----|

SLR Notes:

No probable violations found.

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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
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|-----------|---|---|----|

SLR Notes:

No probable violations found.

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- | | | | |
|-----------|---|-----------|-----------|
| 27 | Part B: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

SLR Notes:

Total points scored for this section: 0
Total possible points for this section: 3



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
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

SLR Notes:

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

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 C(3).3
Yes = 1 No = 0 | 1 | NA |
|----------|--|---|----|

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 C(3).4
Yes = 1 No = 0 | 1 | NA |
|----------|---|---|----|

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 C(3).5
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

SLR Notes:

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

SLR Notes:

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

SLR Notes:

- | | | | |
|----------|---|-----------|-----------|
| 8 | Part C: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
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SLR Notes:

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 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes. The 1 inspection day conducted was for an accident investigation.

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|----------|---|----|-----|
| 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 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Yes.

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

SLR Notes:

Yes.

- | | | | |
|----------|--|---|----|
| 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 | 1 | NA |
|----------|--|---|----|

SLR Notes:

Site visits were made to all accidents.

- | | | | |
|----------|---|---------------------------|--|
| 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 | 2 | NA |
| a. | Observations | Yes <input type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. | Contributing factors | Yes <input type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| c. | Recommendations to prevent recurrences where appropriate | Yes <input type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

SLR Notes:

The 1 inspection day for an accident was for an interstate pipeline.

- | | | | |
|----------|---|---|----|
| 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 | 1 | NA |
|----------|---|---|----|

SLR Notes:

60106 state.

- | | | | |
|----------|---|----|----|
| 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 | .5 | .5 |
|----------|---|----|----|

SLR Notes:

Yes.

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

SLR Notes:

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



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.12
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

Yes. PA One Call Law requires operators and contractors to use Horizontal Directional Drilling Good Practices.

- | | | | |
|----------|--|---|---|
| 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 | 0 |
|----------|--|---|---|

SLR Notes:

No.

- | | | | |
|----------|---|---|---|
| 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.8
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 0 |
|----------|---|---|---|

SLR Notes:

No. State only worked with natural gas operators.

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

Yes. PUC and Dept. of Labor both collect data and evaluates trends.

- | | | | |
|----------|---|---|---|
| 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 195.402 (c)(5)?
Yes = 2 No = 0 | 2 | 0 |
|----------|---|---|---|

SLR Notes:

No.

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

SLR Notes:

Total points scored for this section: 3
Total possible points for this section: 9

1	Operator, Inspector, Location, Date and PHMSA Representative	Info Only	Info Only
	Info Only = No Points		
	Name of Operator Inspected: PPL Interstate Energy Company		
	Name of State Inspector(s) Observed: Terri Cooper-Smith, PA PUC Civil Engineer		
	Location of Inspection: 214 Shoemaker Road, Pottstown, PA 19464		
	Date of Inspection: August 30-31, 2010		
	Name of PHMSA Representative: Glynn Blanton, US DOT State Programs		

SLR Notes:

PPL Interstate Energy Company, 214 Shoemaker Road, Pottstown, PA 19464.
Mr. Frank Bennett, Manager Engineering, Mr. Dennis Levine, General Manager and Ms. Kathleen McVeigh, Supervisor Contracts with PPL Interstate Energy Company's were present during the standard inspection. Other individuals present include Terri Cooper-Smith, PA PUC Engineer and Paul Metro, PA PUC Division Chief. The office records were reviewed on Monday, August 30th and field inspection was performed on Tuesday, August 31. PPL Interstate Energy Company has two 18 inch oil and natural gas pipelines and one 20 inch natural gas pipeline located at Marcus Hook in Delaware County. The pipelines run 84 miles northeasterly and end in Northampton County near Belvidere, PA. The 18 inch oil pipeline operates at 1150 psig has a wall thickness of .375, the 18 inch gas pipeline operates at 1083 psig has a wall thickness of .375 and 20 inch gas pipeline operates at 1200 psig and has a wall thickness of .375. A close interval survey was performed on the existing 18 inch oil and gas pipeline in 1994. Due to the thickness of the insulation on the pipeline it was determined an internal inspection would be the most effective method to use to check wall thickness. Last pipeline repair was performed by the company in 2006. The repair was due to a dent on the 18 inch oil pipeline section located at Station 748.

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, the operator's representative Mr. Frank Bennett was notified two weeks prior to the inspection and provided a copy of PHMSA Standard Inspection Report of A Liquid Pipeline Carrier document.

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:

Yes, Terri Cooper-Smith used PHMSA Form 3, Standard Inspection Report of A Liquid Pipeline Carrier during the inspection and completed each section of the document. She was very careful to complete each section after the operator responded to her question.

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

SLR Notes:

Terri Cooper-Smith was very thorough in her review of the required information on the form. The form consisted of four specific blocks at the end of each question pertaining to compliance with the pipeline safety regulations. If no area of concerns or compliance issues were found the "S" satisfactory was checked. The letter "U" unsatisfactory was used when a violation was cited and a description of the reason for the violation was provided in the comment section of the form. No violations were found or cited during this inspection. She requested additional documentation of each corrosion control and valve maintenance records maintained by the operator. An issue was found pertaining to the operator's O&M Plan not being updated or reviewed within the required 15 months. A new flow chart has been developed to insure the O&M manual is reviewed annually and signed off by Frank Bennett. Based on this change no violation was cited.

An issue was found pertaining to the operator's O&M Plan not being updated or reviewed within the required 15 months. A new flow chart has been developed to insure the O&M manual is reviewed annually and signed off by Frank Bennett. Based on this change no violation was cited.

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 field inspection was conducted at PPL Interstate Energy Company pumping station located at 1111 West Ridge Road in Marcus Hook, PA. Terri Cooper-Smith reviewed the operator's chart readings and operational records at the control center prior to performing an outside inspection of the facilities. The operator had all necessary equipment available for her to review which consisted of charts, maps and maintenance records.

-
- 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:

A standard inspection was performed. The office portion was performed on Monday, August 30th and the field activities review was conducted on Tuesday, August 31st at the operator's pumping station located at Marcus Hook, PA.

- 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:

Terri Cooper-Smith reviewed the pumping station procedures, records on flow charts and atmospheric condition of the components located at the station during the field inspection. Additionally, pipeline markers, valve stations and cathodic protection test points were reviewed.

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

SLR Notes:

Although this was Terri Cooper-Smith's first Hazardous Liquid Pipeline Safety inspection, she exhibited a good working knowledge of the requirements in 49CFR Part 195 which was applicable for this inspection.

- 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 E.10 1 1
Yes = 1 No = 0

SLR Notes:

Terri Cooper-Smith conducted an exit interview with the operator after completing the field activities review on August 31st. A minor area of concern pertaining to atmospheric corrosion found on one of the compressor station valves was mentioned to the operator along with installation of marker signs at the pumping station entrance gate and valve station on Concord Road. No violations were cited or found and the final inspection report will be sent to the operator the report has been reviewed by Paul Metro, Chief Engineer, Gas Safety Division.

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

SLR Notes:

Terri Cooper-Smith described three areas of concerns. The installation of pipeline marker signs at the pumping station entrance and valve station located at Concord Road. A minor atmospheric corrosion issue was found on one of the valves located at the Marcus Hook pumping station. The operator agreed to correct these items.

- 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:

We visited the PPL Interstate pumping station in Marcus Hook, PA and met with Tom Dopsovic, Supervisor Operations and Keith Watson, Pipeline System Attendant. We reviewed the pumping station components, heaters and launching area used to launch pigs into the pipeline to clean and check the integrity of the pipeline. Observed the inspector witnessing Gary Warfield, Supervisor Pipeline Maintenance, performing pipe-to-soil readings along the railroad spur test station and other locations along the pipeline from Marcus Hook pump station to Pottstown, PA. Pipeline marker signs were reviewed along the ROW and valve stations. Terri Cooper-Smith was very professional in the performance of the inspection.

- 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:

There were no best practices identified by the operator or inspector during this observation.

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

a.	Abandonment	<input type="checkbox"/>
b.	Abnormal Operations	<input type="checkbox"/>
c.	Break-Out Tanks	<input type="checkbox"/>
d.	Compressor or Pump Stations	<input checked="" type="checkbox"/>
e.	Change in Class Location	<input checked="" type="checkbox"/>
f.	Casings	<input type="checkbox"/>
g.	Cathodic Protection	<input checked="" type="checkbox"/>
h.	Cast-iron Replacement	<input type="checkbox"/>
i.	Damage Prevention	<input type="checkbox"/>
j.	Deactivation	<input type="checkbox"/>
k.	Emergency Procedures	<input type="checkbox"/>
l.	Inspection of Right-of-Way	<input checked="" type="checkbox"/>
m.	Line Markers	<input checked="" type="checkbox"/>
n.	Liaison with Public Officials	<input type="checkbox"/>
o.	Leak Surveys	<input type="checkbox"/>
p.	MOP	<input type="checkbox"/>
q.	MAOP	<input type="checkbox"/>
r.	Moving Pipe	<input type="checkbox"/>
s.	New Construction	<input type="checkbox"/>
t.	Navigable Waterway Crossings	<input type="checkbox"/>
u.	Odorization	<input type="checkbox"/>
v.	Overpressure Safety Devices	<input checked="" type="checkbox"/>
w.	Plastic Pipe Installation	<input type="checkbox"/>
x.	Public Education	<input checked="" type="checkbox"/>
y.	Purging	<input type="checkbox"/>
z.	Prevention of Accidental Ignition	<input type="checkbox"/>
A.	Repairs	<input type="checkbox"/>
B.	Signs	<input checked="" type="checkbox"/>
C.	Tapping	<input type="checkbox"/>
D.	Valve Maintenance	<input type="checkbox"/>
E.	Vault Maintenance	<input type="checkbox"/>
F.	Welding	<input type="checkbox"/>
G.	OQ - Operator Qualification	<input checked="" type="checkbox"/>
H.	Compliance Follow-up	<input type="checkbox"/>
I.	Atmospheric Corrosion	<input checked="" type="checkbox"/>
J.	Other	<input type="checkbox"/>

SLR Notes:

This was a office records review and field inspection of the pumping station and its components (receivers, pumps, launchers and valves) with a pipe-to-soil reading taken along the pipeline ROW in Delaware and Montgomery Counties. Terri Cooper-Smith was very professional in the performance of the inspection.

14 Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

Terri Cooper-Smith performed a thorough standard inspection review of operator's office records and facilities. The inspection was conducted in a professional manner being respectful of the operator's comments to her questions. She exhibited a good understanding of the hazardous liquid 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 0

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:

No.

2 Are inspection units broken down appropriately? (see definitions in Guidelines) .5 0

Yes = .5 No = 0

SLR Notes:

No. No inspections conducted in 2009.

3 Does state inspection process target high risk areas? .5 0

Yes = .5 No = 0

SLR Notes:

No. No inspections conducted in 2009.

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

Yes = .5 No = 0

SLR Notes:

Not for hazardous liquids.

5 Has state reviewed data on Operator Annual reports for accuracy? .5 0

Yes = .5 No = 0

SLR Notes:

No.

6 Has state analyzed annual report data for trends and operator issues? .5 0

Yes = .5 No = 0

SLR Notes:

No.

7 Has state reviewed data on Incident/Accident reports for accuracy? .5 0

Yes = .5 No = 0

SLR Notes:

No.

8 Does state do evaluation of effectiveness of program based on data? (i.e. performance measures,trends,etc.) .5 0

Yes = .5 No = 0

SLR Notes:

No.

- 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
Yes = .5 No = 0

SLR Notes:

No.

- 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
Yes = .5 No = 0

SLR Notes:

No.

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

SLR Notes:

No.

- 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 NA
Yes = .5 No = 0

SLR Notes:

No inspections conducted in 2009.

- 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
Yes = .5 No = 0

SLR Notes:

No.

Accident/Incident Investigation Learning and Sharing Lessons Learned

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

SLR Notes:

Not about hazardous liquid operators.

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

SLR Notes:

Yes.

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

Inspectors attended classes in July '09 and '10.

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:

Speaking engagements with stakeholders.

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

SLR Notes:

PUC website.

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

SLR Notes:

Total points scored for this section: 2
Total possible points for this section: 9.5



PART H - Miscellaneous

Points(MAX) Score

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

SLR Notes:

Paul Metro is current NAPS Vice Chair, NAPS Legislative Committee chair, and Chair of NARUC Pipeline Safety Sub-Committee.

- 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
Yes = .5 No = 0

SLR Notes:

None in hazardous liquids.

- 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
Yes = .5 No = 0

SLR Notes:

None.

- 4** Did the state participate in/respond to surveys or information requests from NAPS 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:

Yes. Has discussion with surrounding states on safety issues.

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

SLR Notes:

Total points scored for this section: 2
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?
<small>Yes = 1 No = 0</small> | 1 | 0 |
|----------|--|---|---|

SLR Notes:

No.

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

SLR Notes:

No. No inspections conducted.

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

SLR Notes:

No.

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

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

SLR Notes:

No.

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

SLR Notes:

No.

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

SLR Notes:

No.

- | | | | |
|----------|---|----|---|
| 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?
<small>Yes = .5 No = 0</small> | .5 | 0 |
|----------|---|----|---|

SLR Notes:

No.

Hazardous Liquid Pipeline Integrity Management (49 CFR Part 195.452)

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

SLR Notes:

No.

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

SLR Notes:

No.

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

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? Yes = .5 No = 0	.5	0
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SLR Notes:
No.

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

SLR Notes:
No.

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)? Yes = .5 No = 0	.5	0
-----------	---	----	---

SLR Notes:
No.

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

SLR Notes:
No.

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

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:

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: 0
Total possible points for this section: 9