



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

1200 New Jersey Avenue SE  
Washington DC 20590

# 2010 Hazardous Liquid State Program Evaluation

for

Alabama Public Service Commission

## Document Legend

### PART:

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



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

**State Agency:** Alabama

**Agency Status:**

**Date of Visit:** 05/02/2011 - 05/06/2011

**Agency Representative:** Wallace Jones, Sr., Administrator of Pipeline Safety

**PHMSA Representative:** Don Martin

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

**Name/Title:** Lucy Baxley, President

**Agency:** Alabama Public Service Commission

**Address:** 100 N Union St, RSA Union

**City/State/Zip:** Montgomery, Alabama 36104

**Rating:**

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

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**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.

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**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.

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**Scoring Summary**

**PARTS**

**Possible Points    Points Scored**

A	General Program Qualifications	26	26
B	Inspections and Compliance - Procedures/Records/Performance	24.5	24.5
C	Interstate Agent States	0	0
D	Accident Investigations	1.5	1.5
E	Damage Prevention Initiatives	9	9
F	Field Inspection	12	12
G	PHMSA Initiatives - Strategic Plan	9.5	9.5
H	Miscellaneous	3	3
I	Program Initiatives	9	9

**94.5                      94.5**

**TOTALS**

**State Rating .....** **100.0**

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## PART A - General Program Qualifications

Points(MAX) Score

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

### SLR Notes:

No accuracy issues were found with the APSC's 2011 Certification submittal documents.

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

### SLR Notes:

Yes. APSC pipeline safety regulations requires operators to provide telephonic notice to the APSC when an incident occurs. An electronic log of incidents reported to the APSC is maintained by the administrative assistant. The APSC has a mechanism to receive and respond to after hour incident reports.

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

### SLR Notes:

The APSC holds a seminar annually. The last seminar was conducted in December, 2010. The seminar covers natural gas and hazardous liquid operators.

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

### SLR Notes:

The APSC maintains hard copy files and electronic files. The inspection reports for 2010 were easy to access for a random selection of reports to review. All information requests were completed in a timely manner.

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

### SLR Notes:

Yes. Wallace Jones, Administrator of the APSC, is excellent knowledge of the requirements in managing a pipeline safety program as outlined in the "Guidelines For States Participating in the Pipeline Safety Program". Wallace has been active supporting NAPSIR initiatives.

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

### SLR Notes:

The APSC responded in 57 days.

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

SLR Notes:

The APSC implemented the collection of data to monitor measures that will assist the APSC in determining the effectiveness of its pipeline safety program. In 2011 the APSC will begin trending the data.

## Personnel and Qualifications

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

SLR Notes:

Upon a review of the APSC's training records and information contained in the SABA training database, it appears that the APSC has completed the required training or is progressing toward the requirements within the expected timeframes.

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>9</b> | Brief Description of Non-T&Q training Activities   | Info Only | Info Only |
|          | Info Only = No Points  |           |           |
|          | For State Personnel:<br>ANGA Spring and Fall training classes were attended. Alabama One Call Alabama Public Awareness Cooperative Training (APACT).                 |           |           |
|          | For Operators:<br>Provided fire training and plastic fusion qualification. Provided safety training for adhoc requests.  |           |           |
|          | For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:<br>Provided fire training for fire fighting community or any entity that requests it. |           |           |

SLR Notes:

See above.

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

SLR Notes:

Yes. The required training was completed prior to leading OQ inspections.

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

SLR Notes:

The two inspectors leading integrity management inspections have completed IMP training requirements prior to performing IMP inspections.

- |           |   |   |   |
|-----------|---|---|---|
| <b>12</b> | Was the ratio acceptable of Total inspection Person-days to Total Person-days charged to the program by state inspectors? (Region Director may modify points for just cause) (Chapter 4.3) Previous Question B.14 | 5 | 5 |
|           | Yes = 5 No = 0  |   |   |
|           | A. Total Inspection Person Days (Attachment 2):<br>70.00  |   |   |
|           | B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):<br>220 X 0.18 = 39.60  |   |   |
|           | Ratio: A / B<br>70.00 / 39.60 = 1.77  |   |   |
|           | If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0<br>Points = 5   |   |   |

SLR Notes:

Yes. The APSC exceeded the minimum ratio of 0.38. The ratio was 1.77 based upon the APSC's 70 inspection person days shown on Attachment 2 of its 2011 Certification.

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

SLR Notes:

There are currently no plans to modify the inspector staffing levels in the APSC.

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

Info Only Info Only

Info Only = No Points

**SLR Notes:**

The APSC has generally complied with Part A requirements.

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Total points scored for this section: 26

Total possible points for this section: 26



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

Points(MAX) Score

### Inspection Procedures

<b>1</b>	Does the State have a written inspection plan to complete the following? (all types of operators) (Chapter 5.1) Previous Question B.1 + Chapter 5 Changes 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 APSC procedures state that each operator and unit will be inspected annually. OQ Protocol 9 and Damage Prevention are covered during each standard inspection. Follow up inspections are conducted after other inspections that result in non-compliance actions. Operators are required to notify the APSC on new construction projects. Construction inspections are scheduled based on notifications by operators. All reportable accidents are investigated by the APSC as they occur. On site operator training is conducted on an as need basis. The first round of Liquid IMP Program inspections have been completed.

<b>2</b>	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:

The APSC procedures cover the items above. The APSC's inspection frequency states that each operator and unit will be inspected annually. The APSC has developed a risk ranking process that it implemented in 2011.

### Inspection Performance

<b>3</b>	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
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#### SLR Notes:

The APSC procedures require that each operator and unit be inspected each calendar year. The APSC reported on its 2011 Certification - Attachment 1 that all operators and units were inspected during 2010. Attachment 1 information was verified by the APSC's records.

<b>4</b>	Did the state inspection form cover all applicable code requirements addressed on the Federal Inspection forms? (Chapter 5.1 (3)) Previous Question B.5 Yes = 1 No = 0	1	1
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#### SLR Notes:

For standard inspections, the APSC utilizes an inspection form developed by the APSC. The APSC form was developed by revising the federal form to remove questions related to reviewing an operator's Operation and Maintenance Procedures. The APSC conducts a full standard inspection including a review of the Operation and Maintenance Procedures once each three years. When conducting the full standard inspection including O&M Procedures review, the federal form is used. The federal form is used for OQ, LNG, and Liquid IMP inspections.

<b>5</b>	Did state complete all applicable portions of inspection forms? (Chapter 5.1 (3)) Previous Question B.6 Yes = 1 No = 0	1	1
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#### SLR Notes:

Upon a review of randomly selected inspection files, applicable portions of the forms were completed.

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

There were no safety related condition reports open or filed during 2010.

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

Yes. Question 20 (a) of the APSC's standard inspection form covers this pipeline safety concern.

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

Question 3 (b) of the APSC's hazardous liquid standard inspection form covers requirements in 195.402 (c) and Question 27 covers the requirement to determine accident causes.

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

The APSC periodically reviews the National Pipeline Mapping System (NPMS) which indicates environmentally sensitive areas. Question 1 (a) on its hazardous liquid standard inspection reviews operators' submittals to the NPMS.

<b>10</b>	Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 195.402(c)(5)? Previous Question B.11 Yes = 1 No = 0	1	1
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**SLR Notes:**

Yes. The APSC covers the requirements of 195.402 on its inspection checklist form, Question 27, during each standard inspection.

## Compliance - 60105(a) States

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

Upon a review of randomly inspection files, inspectors initial each response item as acceptable and complete a form which documents acceptance of the operator's remedial action. The APSC maintains a record of active probable violations until closure of the inspection file.

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

Yes. The APSC's procedures require that the inspector conduct a followup inspection to confirm whether or not corrective action has been taken by the operator or to followup during the next scheduled inspection.

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

The APSC's procedures state that a written notification will be sent to the operator notifying the operator of any non-compliance.

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

**SLR Notes:**

Yes. The APSC's procedures require that the inspector conduct a followup inspection to confirm whether or not corrective action has been taken by the operator.

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

**SLR Notes:**

Upon a review of randomly selected inspection files, all inspections with discovered probable violations had letters of non-compliance in the files.

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

**SLR Notes:**

Upon a review of randomly selected inspection files, the files contained responses from operators within the deadlines given by the APSC. The APSC had conducted followup inspections with operators to confirm if corrective action had taken place.

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

**SLR Notes:**

The APSC did not have a need to request a "show cause" hearing before the commission.

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

**SLR Notes:**

Upon a review of randomly inspection files, inspectors initial each response item as acceptable and complete a form which documents acceptance of the operator's remedial action. The APSC maintains a record of active probable violations until closure of the inspection file.

- |           |   |                 |     |
|-----------|---|-----------------|-----|
| <b>19</b> | Were compliance actions sent to a company officer? (manager or board member if municipal/government system) (Chapter 5.1(4)) Previous Question C(1).8 | .5              | 0.5 |
|           |   | Yes = .5 No = 0 |     |

**SLR Notes:**

Upon a review of randomly selected inspection reports, compliance letters were sent to a company officer of private firms and the appropriate individual in a municipal or government system.

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

**SLR Notes:**

Yes. The APSC's rules and procedures provide operators with an opportunity to argue their position as to whether a probable violation occurred. The operator is provided with an opportunity to present its case in a "show cause" hearing before a presiding officer or the commission.

## Compliance - 60106(a) States

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

**SLR Notes:**

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

**SLR Notes:**



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

SLR Notes:

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- |           |  |   |    |
|-----------|--|---|----|
| <b>24</b> | 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<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|-----------|--|---|----|

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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- |           |  |           |    |
|-----------|--|-----------|----|
| <b>27</b> | 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)<br>Info Only = No Points | Info Only | NA |
|-----------|--|-----------|----|

SLR Notes:

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- |           |   |           |           |
|-----------|---|-----------|-----------|
| <b>28</b> | Part B: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

SLR Notes:

The APSC has generally complied with Part B requirements.

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Total points scored for this section: 24.5  
Total possible points for this section: 24.5



## PART C - Interstate Agent States

Points(MAX) Score

- |          |  |   |    |
|----------|--|---|----|
| <b>1</b> | Did the state use an inspection form that was approved by the Regional Director? Previous Question C(3).1<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

SLR Notes:

The APSC does not have an interstate agent agreement.

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

SLR Notes:

The APSC does not have an interstate agent agreement.

- |          |  |   |    |
|----------|--|---|----|
| <b>3</b> | 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<br>Yes = 1 No = 0 | 1 | NA |
|----------|--|---|----|

SLR Notes:

The APSC does not have an interstate agent agreement.

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

SLR Notes:

The APSC does not have an interstate agent agreement.

- |          |  |   |    |
|----------|--|---|----|
| <b>5</b> | 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<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

SLR Notes:

The APSC does not have an interstate agent agreement.

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

SLR Notes:

The APSC does not have an interstate agent agreement.

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

SLR Notes:

The APSC does not have an interstate agent agreement.

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>8</b> | Part C: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

The APSC does not have an interstate agent agreement.

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

## PART D - Accident Investigations

Points(MAX) Score

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

### SLR Notes:

The APSC was aware of the procedures and was in communication with PHMSA's Southern Region Office. There were no accidents that met federal reporting requirements during 2010.

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

### SLR Notes:

Yes. The APSC's program manager correctly stated the contents of the MOU between PHMSA and the NTSB. He was aware that the MOU is contained in the Appendices of the Guidelines.

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

### SLR Notes:

There were no hazardous liquid accidents meeting federal reporting requirements during 2010.

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

### SLR Notes:

There were no hazardous liquid accidents meeting federal reporting requirements during 2010.

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

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

### SLR Notes:

There were no hazardous liquid accidents meeting federal reporting requirements during 2010.

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

### SLR Notes:

There were no hazardous liquid accidents meeting federal reporting requirements during 2010.

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

### SLR Notes:

There were no hazardous liquid accidents meeting federal reporting requirements during 2010.

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

### SLR Notes:

The APSC has generally complied with Part D requirements.

---

Total points scored for this section: 1.5  
Total possible points for this section: 1.5



## PART E - Damage Prevention Initiatives

Points(MAX)    Score

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Has the state reviewed directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies? Previous Question B.12<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

### SLR Notes:

Yes. The APSC conducts reviews of operators' OM procedures on a three year rotational basis. Directional drilling/boring procedures are a part of the review.

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

### SLR Notes:

Yes. The APSC's standard inspection form Question 13 has the inspector review the operator's damage prevention program and records.

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

### SLR Notes:

Wallace Jones participates in the Alabama Damage Prevention Council where he has encouraged stakeholder representatives to use CGA Best Practices. The APSC includes damage prevention topics during its annual pipeline safety seminar.

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests? New 2008<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

### SLR Notes:

The APSC collects this information each year and uses the information in its relative risk ranking model.

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

### SLR Notes:

Yes. The APSC reviews operators' compliance with damage prevention requirements under 195.402 and operators' failure investigation records. Excavation damage related failures and repairs are part of this information.

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

### SLR Notes:

The APSC has generally complied with Part E requirements.

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:  
Shell Chemical
- Name of State Inspector(s) Observed:  
Tommy Lancaster
- Location of Inspection:  
Shell's Mobile Site in Saraland, AL
- Date of Inspection:  
10/25/2011
- Name of PHMSA Representative:  
Don Martin

### SLR Notes:

The Alabama Public Service Commission conducted a standard inspection of Shell Chemical's pipeline facilities. Shell operates two pipelines between the Mobile Site Refinery and the Storage Terminal. The pipelines are a 14" pipeline crude oil pipeline and 10" refined products pipeline.

- 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:

The APSC notified the operator of the inspection four weeks prior to the start of the inspection.

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

### SLR Notes:

The APSC inspector utilized the federal standard inspection form, revised 7/11/2011.

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

### SLR Notes:

The APSC inspector checked the appropriate boxes on the form indicating the results of each regulatory requirement. Notes were also written on the form documenting pertinent information.

- 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 APSC inspector checked the cathodic protection test point equipment; i.e., volt meter and half cell.

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

### SLR Notes:

The APSC inspector conducted a standard inspection including procedures, records and observation of cathodic protection test point readings in the field.

- 7** Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) New 2008, comprehensive question worth 2 points total 2 2  
Yes = 2 No = 0 Needs Improvement = 1
- a. Procedures ☒
  - b. Records ☒
  - c. Field Activities/Facilities ☒
  - d. Other (Please Comment) ☐

**SLR Notes:**

The APSC covered all O&M Procedures, records since last inspection and observed CP test point readings in the field. Also the inspector observed the condition of right of way, signs and markers.

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

**SLR Notes:**

Yes. Mr. Lancaster has 24 years experience in pipeline safety with the APSC. He has completed all of the Training and Qualifications courses required for standard inspections. He exhibited good knowledge of the regulations and the pipeline safety program.

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

**SLR Notes:**

The APSC inspector did conduct an exit briefing with the operator at the end of the standard inspection. The inspector provided an explanation of the next action steps in completing the written notification and follow up.

- |           |  |   |   |
|-----------|--|---|---|
| <b>10</b> | 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:**

There were no probable violations found during the standard inspection.

- |           |  |           |           |
|-----------|--|-----------|-----------|
| <b>11</b> | 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:**

The APSC inspector observed cathodic protection test point readings and reviewed the condition of right of way, signs and markers.

- |           |   |           |           |
|-----------|---|-----------|-----------|
| <b>12</b> | 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 were observed.

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

- |    |                               |                                     |
|----|-------------------------------|-------------------------------------|
| a. | Abandonment                   | <input checked="" type="checkbox"/> |
| b. | Abnormal Operations           | <input checked="" type="checkbox"/> |
| c. | Break-Out Tanks               | <input type="checkbox"/>            |
| d. | Compressor or Pump Stations   | <input checked="" type="checkbox"/> |
| e. | Change in Class Location      | <input type="checkbox"/>            |
| f. | Casings                       | <input checked="" type="checkbox"/> |
| g. | Cathodic Protection           | <input checked="" type="checkbox"/> |
| h. | Cast-iron Replacement         | <input type="checkbox"/>            |
| i. | Damage Prevention             | <input checked="" type="checkbox"/> |
| j. | Deactivation                  | <input checked="" type="checkbox"/> |
| k. | Emergency Procedures          | <input checked="" 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 checked="" type="checkbox"/> |
| o. | Leak Surveys                  | <input type="checkbox"/>            |
| p. | MOP                           | <input checked="" type="checkbox"/> |
| q. | MAOP                          | <input type="checkbox"/>            |
| r. | Moving Pipe                   | <input checked="" type="checkbox"/> |
| s. | New Construction              | <input checked="" type="checkbox"/> |

t.	Navigable Waterway Crossings	<input checked="" 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 checked="" type="checkbox"/>
A.	Repairs	<input checked="" type="checkbox"/>
B.	Signs	<input checked="" type="checkbox"/>
C.	Tapping	<input checked="" type="checkbox"/>
D.	Valve Maintenance	<input checked="" type="checkbox"/>
E.	Vault Maintenance	<input type="checkbox"/>
F.	Welding	<input checked="" type="checkbox"/>
G.	OQ - Operator Qualification	<input checked="" type="checkbox"/>
H.	Compliance Follow-up	<input checked="" type="checkbox"/>
I.	Atmospheric Corrosion	<input checked="" type="checkbox"/>
J.	Other	<input type="checkbox"/>

**SLR Notes:**

The APSC inspected all of the items contained on the federal standard inspection form for hazardous liquid pipelines.

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

Info Only Info Only

Info Only = No Points

**SLR Notes:**

The APSC generally complied with the requirements of Part F of this evaluation.

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. The APSC developed a relative risk ranking model during 2009. The APSC populated the data into the model during 2010. The model has been used to schedule inspections during 2011. The model produces information that can rank inspection unit risks relative to all units.

2 Are inspection units broken down appropriately? (see definitions in Guidelines) .5 0.5

Yes = .5 No = 0

#### SLR Notes:

Based upon the definition of inspection units in the Guidelines, it appears that the APSC's inspection units are appropriate.

3 Does state inspection process target high risk areas? .5 0.5

Yes = .5 No = 0

#### SLR Notes:

The APSC has designed the model to provide trends on certain threats such as third party damage for each operator and unit.

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

4 Does state use data to analyze effectiveness of damage prevention efforts in the state? (DIRT or other data, etc) .5 0.5

Yes = .5 No = 0

#### SLR Notes:

The is collecting data to conduct an analysis of damages in the state of Alabama. The APSC is a participant in the Alabama Damage Prevention Alliance which has an interest in damage prevention effectiveness.

5 Has state reviewed data on Operator Annual reports for accuracy? .5 0.5

Yes = .5 No = 0

#### SLR Notes:

Yes. The APSC revised its rules in 2009 to require operators to submit a copy of annual reports directly to the APSC. The APSC analyzes the reports in March of each year. Information from the reports is used in the APSC's risk ranking model.

6 Has state analyzed annual report data for trends and operator issues? .5 0.5

Yes = .5 No = 0

#### SLR Notes:

The APSC reviews leak repair information and pipe data reported by operators.

7 Has state reviewed data on Incident/Accident reports for accuracy? .5 0.5

Yes = .5 No = 0

#### SLR Notes:

Yes. The APSC reviews all written Accident Reports filed by operators. The APSC insures that the operator's report is consistent with findings in the APSC's investigation report.

8 Does state do evaluation of effectiveness of program based on data? (i.e. performance measures,trends,etc.) .5 0.5

Yes = .5 No = 0

#### SLR Notes:

Yes. The APSC has now collected enough data to begin an evaluation of program effectiveness. The APSC will be developing trend charts in 2011.

- 
- |          |   |    |     |
|----------|---|----|-----|
| <b>9</b> | 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?<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|----------|---|----|-----|
- 

**SLR Notes:**

Upon a review of the Operator Qualification Database, it appears that the APSC has uploaded the results of its Operator Qualification inspections, including inspections of plans and Protocol 9 (Field Inspection).

---

- |           |   |    |     |
|-----------|---|----|-----|
| <b>10</b> | Did the State submit their replies into the Integrity Management Database (IMDB) in response to the Operators notifications for their integrity management program?<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|-----------|---|----|-----|
- 

**SLR Notes:**

All CY 2010 notifications that involved a pipeline in Alabama showed to be processed in the Liquid IM Database.

---

- |           |   |    |     |
|-----------|---|----|-----|
| <b>11</b> | Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|-----------|---|----|-----|
- 

**SLR Notes:**

Yes. A review of the the Liquid IM Database indicates that the APSC has uploaded the inspection protocol forms.

---

- |           |   |    |     |
|-----------|---|----|-----|
| <b>12</b> | 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<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|-----------|---|----|-----|
- 

**SLR Notes:**

Yes. A review of the the Liquid IM Database indicates that the APSC has uploaded completed inspection protocol forms.

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- |           |  |    |     |
|-----------|--|----|-----|
| <b>13</b> | Has state confirmed transmission operators have submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submission?<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|-----------|--|----|-----|
- 

**SLR Notes:**

Question 1 on its standard inspection form covers an operator's submission of updates to the National Pipeline Mapping System.

---

## Accident/Incident Investigation Learning and Sharing Lessons Learned

- |           |  |    |     |
|-----------|--|----|-----|
| <b>14</b> | Has state shared lessons learned from incidents/accidents? (i.e. NAPSIR meetings and communications)<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|-----------|--|----|-----|
- 

**SLR Notes:**

The APSC discusses details of accidents which have occurred in Alabama each year at the annual meeting of NAPSIR's Southern Region.

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- |           |   |    |    |
|-----------|---|----|----|
| <b>15</b> | Does the State support data gathering efforts concerning accidents? (Frequency/Consequence/etc)<br><small>Yes = .5 No = 0</small> | .5 | NA |
|-----------|---|----|----|
- 

**SLR Notes:**

No accident data gathering requests were made to the APSC.

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- |           |  |           |           |
|-----------|--|-----------|-----------|
| <b>16</b> | Does state have incident/accident criteria for conducting root cause analysis?<br><small>Info Only = No Points</small> | Info Only | Info Only |
|-----------|--|-----------|-----------|
- 

**SLR Notes:**

The APSC has not established criteria at this point but is planning to include criteria during its next office procedures revision.

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- |           |   |           |           |
|-----------|---|-----------|-----------|
| <b>17</b> | Does state conduct root cause analysis on incidents/accidents in state?<br><small>Info Only = No Points</small> | Info Only | Info Only |
|-----------|---|-----------|-----------|
- 

**SLR Notes:**

The APSC has not utilized the root cause analysis techniques in an accident investigation up to this point in time.

---

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

SLR Notes:

At least one individual from the APSC has completed root cause analysis training.

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## Transparency - Communication with Stakeholders

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

SLR Notes:

The APSC posts pipeline safety information on the Commission's website.

---

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

SLR Notes:

The APSC shares a summary of the annual results of pipeline safety inspections on its portion of the Commission's web site.

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

SLR Notes:

The APSC has generally complied with Part G requirements.

---

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



## PART H - Miscellaneous

Points(MAX) Score

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

### SLR Notes:

From Attachment 10 of the APSC's 2011 Certification submittal: Alabama's Gas Pipeline Safety Section's Integrity Management Inspection Team completed initial inspections on all operators and began review inspections on those that had originally been inspected several years ago. The other inspection teams completed Standard Inspections on all other operators throughout the state. Alabama's inspectors and Administrator completed 14 resident classes at PHMSA's T&Q, 16 web-based training courses and attended 7 webinars on various subjects such as Gathering Lines, DIMP and Control Room Management. Administrator Wallace Jones continued his work with the PHMSA/NAPSR DIMP Implementation Team and attended pilot inspections in Des Moines, Iowa and Jackson, Alabama during CY-2010. Mr. Jones, Judy Ramsey (Supervisor), Harold Dunson (Supervisor) and John Harris (Supervisor) attended the NAPSR Southern Region Meeting in Savannah, Georgia. Mr. Jones, Mr. Dunson and Mr. Harris also attended the NAPSR National Meeting in Portland, Oregon. Mr. Jones continued his active support of, and involvement with, the Alabama Damage Prevention Council. The efforts of this council are aimed at involving more stakeholders throughout the state in damage prevention activities. The council has set a goal of having Alabama complete the 9 Elements of a Damage Prevention Program.

- |          |   |    |     |
|----------|---|----|-----|
| <b>2</b> | 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<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

### SLR Notes:

The APSC is taking steps to develop legislative proposals to enhance the damage prevention laws. The steps are outlined in the APSC's 2011 Certification Attachment 10 as follows: Enforcement is the weak link in Alabama's damage prevention program. The newly-formed (late 2009) Alabama Damage Prevention Council has been working to involve more stakeholders in the damage prevention effort. The Alabama Gas Pipeline Safety Section has also requested funding through the "One-Call Grant" to conduct several educational meetings throughout the state during 2011. These meetings will hopefully bring additional focus on damage prevention in the state and the need for stricter enforcement of the existing "One-Call Law". The current law gives enforcement powers to the state Attorney General and the county District Attorneys. Neither entity is currently active in upholding the law.

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

### SLR Notes:

The APSC recognizes that third party excavation is the largest threat to the integrity of pipelines in Alabama. The APSC is actively participating a stakeholder group dedicated to improving the damage prevention law in Alabama. The APSC is actively assessing pipeline risks through the use of its relative risk ranking model.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Did the state participate in/respond to surveys or information requests from NAPSR or PHMSA?<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

### SLR Notes:

Yes. Responded to all requests from NAPSR and PHMSA.

- |          |   |    |     |
|----------|---|----|-----|
| <b>5</b> | Sharing Best Practices with Other States - (General Program)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

### SLR Notes:

The APSC shared its relative risk ranking model with other states.

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

### SLR Notes:

The APSC has generally complied with Part H requirements.

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

## PART I - Program Initiatives

Points(MAX) Score

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

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

**SLR Notes:**

Yes. The APSC conducted Drug and Alcohol written plan reviews for all operators in 2006. The APSC reviews program changes during each standard inspection. The APSC conducted six drug and alcohol inspections during 2010.

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

**SLR Notes:**

The APSC reviews this requirement each year when it conducts a standard inspection of an operator. The APSC uses a one page form to document the results of the drug and alcohol testing.

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

**SLR Notes:**

The APSC reviews operator's number of positive results and return to duty testing on the one page form included with the standard inspection form.

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

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

**SLR Notes:**

The APSC reviewed all operators' OQ written programs prior to 2008. Upon a review of the OQ database, it appears that most of the program reviews were completed prior to 2007. The OQ database also shows that the APSC uploaded the results of Protocol 9 inspections. The APSC continued reviewing the field portion (Protocol 9) of Part 195, Subpart G during 2010.

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

**SLR Notes:**

The APSC utilizes the OQ Protocol forms to conduct its inspections. Upon a review of the OQ Database, all uploaded protocol questions were completed.

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

**SLR Notes:**

Yes. While conducting standard inspections in 2010, the APSC reviewed operators' personnel qualification and requalification records.

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

**SLR Notes:**

Yes. This concern is being addressed as Protocol 9 inspections are conducted.

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

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

**SLR Notes:**

Yes. The APSC has conducted the integrity management programs of all hazardous liquid pipeline operators. The APSC placed a high priority on conducting these inspections since 2009.

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

SLR Notes:

The Liquid IMP database indicates that the APSC has reviewed Protocols with operators' plans during its inspections. The APSC has completed Liquid IMP inspections on all hazardous liquid pipeline operators.

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

SLR Notes:

Yes. The APSC uses the federal protocol forms which cover all requirements of 195.452.

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

SLR Notes:

Yes. The APSC completes the federal protocol forms during its inspections.

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

SLR Notes:

Yes. The APSC completes the federal protocol forms during its inspections. This requirement is covered in the protocol forms.

## Public Awareness (49 CFR Section 195.440)

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

SLR Notes:

Yes. Prior to 2008, the APSC completed a review of all operators Public Awareness Plans for compliance with 195.440 and the incorporated API RP 1162 standard. The APSC conducted its review in conjunction with the Public Awareness Plan Clearinghouse. Operators with plans that were found to be deficient were notified of changes needed in their plans.

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

SLR Notes:

Yes. Prior to 2008, the APSC completed a review of all operators Public Awareness Plans for compliance with 195.440 and the incorporated API RP 1162 standard. The APSC conducted its review in conjunction with the Public Awareness Plan Clearinghouse. Operators with plans that were found to be deficient were notified of changes needed in their plans.

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

SLR Notes:

Yes. The APSC has incorporated the new requirements in 195.440 into its standard inspection checklist form. Operators's actions are verified for compliance with Public Awareness Plans.

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

SLR Notes:

The APSC is waiting on inspection form to be released by PHMSA. The APSC plans to conduct evaluation reviews after the inspection form is released and the training class is completed.

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

SLR Notes:

The APSC has generally complied with Part I requirements.

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