



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

VIRGINIA STATE CORPORATION 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:** Virginia

**Agency Status:**

**Date of Visit:** 05/24/2011 - 05/26/2011

**Agency Representative:** Massoud Tahamtani, Director of Utility and Railroad Safety and Jim Hotinger

**PHMSA Representative:** Massoud Tahamtani, Director of Utility and Railroad Safety and Jim Hotinger

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

**Name/Title:** Judith Williams Jagdmann, Chairman

**Agency:** Virginia State Corporation Commission

**Address:** Tyler Building: P.O. Box 1197

**City/State/Zip:** Richmond, Virginia 23218

**Rating:**

**60105(a):** Yes **60106(a):** Yes **Interstate Agent:** Yes

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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  
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

26  
25.5  
4  
5.5  
7  
12  
9.5  
2.5  
9

26  
25.5  
4  
5.5  
7  
12  
9.5  
2.5  
9

**TOTALS**

**101                    101**

**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 |
| <div style="display: flex; justify-content: space-between;"><div>a. State Jurisdiction and agent status over Hazardous Liquid and CO2 facilities (1)</div><div style="text-align: right;"><input checked="" type="checkbox"/></div></div> <div style="display: flex; justify-content: space-between;"><div>b. Total state inspection activity (2)</div><div style="text-align: right;"><input checked="" type="checkbox"/></div></div> <div style="display: flex; justify-content: space-between;"><div>c. Hazardous Liquid facilities subject to state safety jurisdiction (3)</div><div style="text-align: right;"><input checked="" type="checkbox"/></div></div> <div style="display: flex; justify-content: space-between;"><div>d. Hazardous Liquid pipeline incidents (4)</div><div style="text-align: right;"><input checked="" type="checkbox"/></div></div> <div style="display: flex; justify-content: space-between;"><div>e. State compliance actions (5)</div><div style="text-align: right;"><input checked="" type="checkbox"/></div></div> <div style="display: flex; justify-content: space-between;"><div>f. State record maintenance and reporting (6)</div><div style="text-align: right;"><input checked="" type="checkbox"/></div></div> <div style="display: flex; justify-content: space-between;"><div>g. State employees directly involved in the Hazardous Liquid pipeline safety program (7)</div><div style="text-align: right;"><input checked="" type="checkbox"/></div></div> <div style="display: flex; justify-content: space-between;"><div>h. State compliance with Federal requirements (8)</div><div style="text-align: right;"><input checked="" type="checkbox"/></div></div> |  |   |   |

### SLR Notes:

Yes. All information submitted on the 60105 Certification/60106 Agreement was completed was correct.

- |          |  |   |   |
|----------|--|---|---|
| <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. When operators call the VA SCC to report an incident, they call a dedicated line and should the call be placed after hours the line is line is forwarded to the "on call" inspector.

- |          |  |   |   |
|----------|--|---|---|
| <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:

Yes. October 19-21, 2010 in Virginia Beach, VA.

- |          |  |   |   |
|----------|--|---|---|
| <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:

Yes. All records and reports are kept in file cabinets and electronically.

- |          |   |   |   |
|----------|---|---|---|
| <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. Both Massoud Tahamtani and Jim Hotinger have extensive knowledge in pipeline safety, safety regulations and the state's relationship with PHMSA. Both have served on many NAPS/PHMSA committees.

- |          |   |   |   |
|----------|---|---|---|
| <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:

Yes. The letter referencing the 2009 evaluation from Zach Barrett was sent on July, 23, 2010 and the response letter from the VA SCC chair was dated August 12, 2010.

- |          |   |   |   |
|----------|---|---|---|
| <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 | 1 | 1 |
|----------|---|---|---|

Yes = 1 No = 0

SLR Notes:

No action was requested for the hazardous liquid program evaluation.

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## 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:

Yes. All inspectors have completed training or are on schedule to complete training in the time frame.

- 
- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>9</b> | Brief Description of Non-T&Q training Activities | Info Only | Info Only |
|----------|--|-----------|-----------|
- Info Only = No Points
- For State Personnel:
- For Operators:
- For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:

SLR Notes:

- 
- |           |   |   |   |
|-----------|---|---|---|
| <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.

- 
- |           |   |   |   |
|-----------|---|---|---|
| <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:

Yes. Jim Fisher and Brian Roberts have completed all training to be qualified to conduct integrity management inspections.

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- |           |   |   |   |
|-----------|---|---|---|
| <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):  
90.00
- B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
220 X 0.66 = 145.20
- Ratio: A / B  
90.00 / 145.20 = 0.62
- If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0  
Points = 5

SLR Notes:

Yes. Ratio exceeds minimum needed for acceptable total inspection person days.

- 
- |           |   |           |           |
|-----------|---|-----------|-----------|
| <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:

**14**      Part-A General Comments/Regional Observations  
Info Only = No Points

Info Only   Info Only

SLR Notes:

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

- 1** Does the State have a written inspection plan to complete the following? (all types of operators) (Chapter 5.1) Previous Question B.1 + Chapter 5 Changes 6.5 6.5  
Yes = 6.5 No = 0 Needs Improvement = 50% Deduction
- |   |   |                                      |                          |   |
|---|---|--------------------------------------|--------------------------|---|
| a | Standard Inspections (Including LNG) (Max points = 2) | Yes <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:

Yes. These items are included in the SCC Pipeline Safety Program procedures, last updated in May 2011.

- 2** Did the written Procedures for selecting operators adequately address key concerns? (Chapter 5.1) Previous Question B.2, items a-d are worth .5 point each 2 2  
Yes = 2 No = 0 Needs Improvement = 50% Deduction
- |   |  |                           |                          |   |
|---|--|---------------------------|--------------------------|---|
| a | Length of time since last inspection   | Yes <input 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 type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c | Type of activity being undertaken by operator (construction etc)                               | Yes <input type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d | For large operators, rotation of locations inspected   | Yes <input type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

#### SLR Notes:

Yes. These are referenced in Section IV.I - Selecting Companies, of the VA SCC Pipeline Safety Program Procedures.

### Inspection Performance

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

#### SLR Notes:

Listed below are the time tables listed in the VA SCC Pipeline Safety Program Procedures.

Inspection Intervals	Records	Facilities
Intrastate Liquid	100%	100%
Integrity Management Field Audits (pig digs, pig runs, etc.)	As necessary	
Interstate Liquid	Annual plan formulated in consultation with the Eastern Region-PHMSA	

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

#### SLR Notes:

Yes. Uses the federal form where available and uses state form for other types of inspections.

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

#### SLR Notes:

Yes. Checked report for Interstate line inspection - Colonial and Intrastate line inspection - Transmontagne.

<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 Conditions reported for 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. Reviewed liquid operator corrosion procedures.

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

Yes.

<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:**

Yes. Through operator records and the NMPS.

<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	NA
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**SLR Notes:**

None in 2010.

<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) Info Only = No Points	Info Only	Info Only
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**SLR Notes:**

<b>28</b>	Part B: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only
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**SLR Notes:**

## 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:**

Yes. Found one violation and collected \$9500 in fines.

<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. Section V - PIPELINE ENFORCEMENT PROCEDURES of the VA SCC Pipeline Safety Program Procedures.

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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	1
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SLR Notes:

Yes. Section V - PIPELINE ENFORCEMENT PROCEDURES of the VA SCC Pipeline Safety Program Procedures.

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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	1
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SLR Notes:

Yes. Section V - PIPELINE ENFORCEMENT PROCEDURES of the VA SCC Pipeline Safety Program Procedures.

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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	1
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SLR Notes:

Yes. Found one violation and collected \$9500 in fines.

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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	1
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SLR Notes:

Yes.

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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	1
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SLR Notes:

Yes. This is included in APPENDIX NO. 5 - PIPELINE SAFETY ENFORCEMENT PROCEDURES FOR JURISDICTIONAL OPERATORS

VII. COMMISSION ACTION

If an operator disputes the probable violation(s) in the NOPV, or fails to respond to the NOPV in accordance with the procedures outlined herein, the matter may be presented to the Commission for formal resolution. The Commission may:

- (a) issue a temporary injunction if immediate potential danger to public and property exists; and/or
- (b) issue a Rule to Show Cause and schedule a hearing during which the operator is required to show cause why it should not be enjoined and/or penalized on account of the alleged probable violations.

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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	1
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SLR Notes:

Yes. The VA SCC issued a fine and received a check from the operator (\$9500).

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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	0.5
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SLR Notes:

Yes.



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

SLR Notes:

Yes. APPENDIX NO. 5 - PIPELINE SAFETY ENFORCEMENT PROCEDURES  
FOR JURISDICTIONAL OPERATORS

Section V. RESPONSE OPTIONS

The operator may respond to the Division in one of the following ways:

- (1) agree to the settlement terms outlined in the draft settlement order thereby making this document their offer to settle the outstanding enforcement issue(s). When this option is chosen, the Division must be in receipt of the complete settlement package by the deadline (see section labeled VII for a description of "settlement package");
- (2) request an informal conference with the Commission Staff by the established deadline; or
- (3) submit a written reply disputing the probable violation(s) in the NOPV. The reply must include a complete statement of all relevant facts and a full description of the reasons why the operator disputes the violation(s) alleged in the NOPV.

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## Compliance - 60106(a) States

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

SLR Notes:

Yes.

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

SLR Notes:

Yes. All inspected in reference to PHMSA Region Inspection Plan.

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

None 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	1	NA
Yes = 1 No = 0 Needs Improvement = .5			

SLR Notes:

None found.

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Total points scored for this section: 25.5  
Total possible points for this section: 25.5

## 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 | 1 |
|----------|--|---|---|

SLR Notes:

Yes. VA SCC used Form 3 for inspections.

- |          |  |   |   |
|----------|--|---|---|
| <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 | 1 |
|----------|--|---|---|

SLR Notes:

Yes. Reviewed spreadsheet of activities.

- |          |  |   |   |
|----------|--|---|---|
| <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 | 1 |
|----------|--|---|---|

SLR Notes:

Yes. Conducted Colonial inspection on 9/3/10 and sent report to PHMSA 10/4/10, conducted breakout tanks inspections on 12/21/10 and sent report 12/21/10, conducted Plantation inspection on 10/26/10 and sent report 11/24/10.

- |          |   |   |    |
|----------|---|---|----|
| <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:

None found.

- |          |  |   |   |
|----------|--|---|---|
| <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 | 1 |
|----------|--|---|---|

SLR Notes:

Received a call from PHMSA's Linda Daugherty and did follow up.

- |          |  |   |    |
|----------|--|---|----|
| <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:

- |          |  |   |    |
|----------|--|---|----|
| <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:

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

SLR Notes:

Total points scored for this section: 4  
Total possible points for this section: 4

## PART D - Accident Investigations

Points(MAX) Score

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

### SLR Notes:

Yes. By following Section VI - INVESTIGATION OF PIPELINE INCIDENTS of the VA SCC Pipeline Safety Program Procedures.

- 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. As stated in APPENDIX NO. 6 - INCIDENT INVESTIGATION PROCEDURES

#### IV. On-Site Investigation

After the determination is made that an on-site investigation is required, the inspector shall proceed to the incident site. Upon arrival at the site, the inspector should make contact with the appropriate operator officials, police, fire, and rescue personnel, if necessary. Federal agencies, such as the Pipeline and Hazardous Materials Safety Administration ("PHMSA"), the National Transportation Safety Board ("NTSB"), or the Bureau of Alcohol, Tobacco, Firearms, and Explosives, may be present and often take the lead in investigating incidents. The inspector shall coordinate his investigation activities with them pursuant to the applicable Memorandum of Understanding.

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

### SLR Notes:

Yes. All incidents are logged into an electronic data base.

- 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:

All Accidents are investigated.

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

### SLR Notes:

Yes.

- 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:

None found.

- 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:

None in 2010.

Info Only = No Points

SLR Notes:

---

Total points scored for this section: 5.5  
Total possible points for this section: 5.5



## 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. Virginia has reviewed all operators' drilling/boring procedures. Two companies were cited in the last year for not having drilling/boring covered in OQ.

- |          |  |   |   |
|----------|--|---|---|
| <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. Every time Virginia performs a construction inspection, a review the Miss Utility ticket and a check of the positive response system is conducted. In addition, the VA SCC investigates all underground pipeline damages from excavation.

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

### SLR Notes:

Yes. This is reinforced at the Damage Prevention and Pipeline Safety Conferences. Virginia serves on the CGA Board. Virginia has adopted a number of the best practices as part of its rules.

- |          |   |   |   |
|----------|---|---|---|
| <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:

Yes. This has been for years and copies of the charts developed were given to the State Evaluator showing Virginia's damage ratios.

- |          |   |   |    |
|----------|---|---|----|
| <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 | NA |
|----------|---|---|----|

### SLR Notes:

Yes. All pipeline excavation damages are investigated. Companies are required to report all damages. Data is reviewed with operators to help improve their damage prevention programs. There were no excavation damage accidents in 2010.

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

### SLR Notes:

Total points scored for this section: 7  
Total possible points for this section: 7

## 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:

Colonial Pipeline Company

Name of State Inspector(s) Observed:

Jim Fisher

Location of Inspection:

Columbia, Virginia

Date of Inspection:

5/24/2011

Name of PHMSA Representative:

Dale Bennett

### SLR Notes:

Colonial Pipeline Company Mitchell Junction Unit was inspected. Drew Eakenwas present during the inspection.

- 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:

Operator was notified of the planned 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 inspector used PHMSA'S inspection checklist form for hazardous liquid pipelines.

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

### SLR Notes:

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

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

### SLR Notes:

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

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

### SLR Notes:

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

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

### SLR Notes:

The inspectors compared the procedures to the field activities.

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

**SLR Notes:**

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

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

**SLR Notes:**

The inspector conducted an exit interview with the operator upon completion of his inspection.

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

**SLR Notes:**

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

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

**SLR Notes:**

The Colonial Pipeline Company Mitchell Junction Unit, Unit # 68351, was inspected to include the following facilities: 03 and 04 pipelines from Mitchell Junction to James River Station, (line 03 pump station), and Louisa Station, (line 04 pump station). The following was included in the inspection: Pump stations (signs and security), station safety devices (pressure limiting devices), Right of Way and Right of Way markers, pipeline block valves ( to include valve maintenance and operation), valve protection from unauthorized operation and vandalism, scraper and launcher/receiver traps, firefighting equipment, OQ protocol 9 inspection, cathodic protection (rectifiers and test station readings to ensure adequate cathodic protection).

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

**SLR Notes:**

There were no best practices identified that warrant communicating.

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

- |    |                               |                                     |
|----|-------------------------------|-------------------------------------|
| a. | Abandonment                   | <input 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 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 checked="" 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 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 checked="" 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 field inspection of the receivers, pumps, valves, cathodic protection, line markers, signs, launchers and several sections of the pipeline ROW on Mitchell Junction Unit

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

Info Only Info Only

Info Only = No Points

**SLR Notes:**

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

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





## PART G - PHMSA Initiatives - Strategic Plan

Points(MAX) Score

### Risk base Inspections - Targeting High Risk Areas

1 Does state have process to identify high risk inspection units? 1.5 1.5

Yes = 1.5 No = 0

Risk Factors (criteria) to consider may include:

Miles of HCA's, Geographic area, Population Density

Length of time since last inspection

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

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

#### SLR Notes:

Yes. Virginia uses a number of tools to evaluate risk. First, 23 different factors are evaluated to determine certain risks within each company. Virginia also reviews IMP programs to include HCA's and pipe size and MAOP's along with information from in-line inspections to identify specific risks for the transmission pipelines. The excavation damage data for each company is also reviewed. Virginia also receives information on all leaks repaired by the companies. This data is assessed and reviewed to focus inspection efforts.

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

Yes = .5 No = 0

#### SLR Notes:

Yes.

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

Yes = .5 No = 0

#### SLR Notes:

Yes. Based upon the evaluation performed pursuant to the response to the 23 different factors are evaluated to determine certain risks within each company.

### 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:

Reports of all excavation damages to any pipeline is required to be sent to the Virginia State Corporation Commission. These incidents are investigated to determine root cause. Data is reviewed and analyzed continuously to identify effectiveness and areas of improvement.

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

Yes = .5 No = 0

#### SLR Notes:

Yes.

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

Yes = .5 No = 0

#### SLR Notes:

Yes.

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

Yes = .5 No = 0

#### SLR Notes:

Yes.

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 data is monitored closely to ensure inspections are prioritized.

- |          |  |    |     |
|----------|--|----|-----|
| <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>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes. Checked OQ Data Base webpage.

- |           |  |    |    |
|-----------|--|----|----|
| <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>Yes = .5 No = 0 | .5 | NA |
|-----------|--|----|----|

SLR Notes:

Yes, if necessary. None were received in 2010.

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

SLR Notes:

Yes. Checked the IMP Data Base Webpage.

- |           |  |    |     |
|-----------|--|----|-----|
| <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>Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

Yes.

- |           |   |    |     |
|-----------|---|----|-----|
| <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>Yes = .5 No = 0 | .5 | 0.5 |
|-----------|---|----|-----|

SLR Notes:

Yes.

## 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>Yes = .5 No = 0 | .5 | 0.5 |
|-----------|---|----|-----|

SLR Notes:

Yes. Virginia makes presentations at NAPSIR and their Pipeline Safety Conference.

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

SLR Notes:

Yes. As needed.

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

SLR Notes:

Yes. As part of VA SCC Pipeline Safety Program Procedures  
APPENDIX NO. 6 - INCIDENT INVESTIGATION PROCEDURES

### IV. On-Site Investigation

The goals of an on-site investigation are:

- (I) Collect information to help determine the probable cause, contributing factors, and root cause(s).

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

SLR Notes:

---

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

SLR Notes:

Yes. Five inspectors in 2010.

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## Transparency - Communication with Stakeholders

<b>19</b>	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:

Participates with the Virginia Gas Operator's Association, periodic meetings with companies and contractor trainings.

---

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

SLR Notes:

Website and inquiries from the public.

---

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

SLR Notes:

---

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:

All above ground storage tanks at Colonial Pipeline's Mitchell Junction were inspected for corrosion rate. Approximately 2000 ft. of 14" steel pipe was removed from bridge over Aquia Creek.

- |          |   |    |     |
|----------|---|----|-----|
| <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:

Passage of new sewer marking legislation. Served on several NAPSR/PHMSA Committees. Future efforts include addressing abandoned lines and piloting new locating tape (3M).

- |          |   |    |    |
|----------|---|----|----|
| <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 | NA |
|----------|---|----|----|

### SLR Notes:

No major risk reduction items for 2010.

- |          |  |   |   |
|----------|--|---|---|
| <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. All surveys, such as the cast iron survey were completed and submitted as needed.

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

### SLR Notes:

Have assisted Indiana with damage prevention program. Share information at NAPSR Eastern Region.

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

### SLR Notes:

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

## 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><small>Yes = 1 No = 0</small> | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes.

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

SLR Notes:

Yes. Drug and alcohol information is obtained subsequent to Incidents and Form 13 ? Field Drug and Alcohol Inspections are performed. The Division has also verified the random drug testing rates for each company.

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

SLR Notes:

Yes. When noted.

### 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><small>Yes = 1 No = 0</small> | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Done in 2005 and program is continuously monitored via field and headquarter inspections.

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

SLR Notes:

Yes, all programs have been done and continue to be done as inspections involving OQ tasks are performed. For example, in 2010, a pipeline contractor was found directionally drilling without being trained through his own or the operator's OQ program. Virginia inspectors have also identified OQ tasks that the operator had not identified or qualified employees to do.

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

SLR Notes:

Yes. Inspectors review OQ records when performing Protocol 9 inspections and whenever "probable violations" involving OQ tasks are found.

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

SLR Notes:

Yes. Inspectors review OQ records when performing Protocol 9 inspections and whenever "probable violations" involving OQ tasks are found.

### 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><small>Yes = 1 No = 0</small> | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes. Inspections were conducted in 2010. Both the HCA's and non-HCA's were verified as well.

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

SLR Notes:

Yes. Virginia inspected each operator's HCA's via site visits and documented and reviewed the calculation of the impact radii.

---

<b>10</b>	Has the state reviewed operator IMPs for compliance with 195.452? Yes = .5 No = 0	.5	0.5
-----------	--	----	-----

**SLR Notes:**

Yes. A complete review was performed in CY08 and will be again in CY11. Virginia inspectors monitor all IMP activities for operators every year.

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<b>11</b>	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	0.5
-----------	---	----	-----

**SLR Notes:**

Yes. Virginia strives to inspect all of the inspections, tests, and remedial actions required by each operator's IMP program. They are notified via email or phone of the activities.

---

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

**SLR Notes:**

Yes. Patrolling records for companies in Form 1 along with Virginia's own examination of the rights of way.

---

## Public Awareness (49 CFR Section 195.440)

<b>13</b>	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	0.5
-----------	---	----	-----

**SLR Notes:**

evaluation was conducted in 2006 and oversight has been maintained. Inspections are scheduled for CY11 to monitor the effectiveness of the programs.

---

<b>14</b>	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	0.5
-----------	--	----	-----

**SLR Notes:**

All materials and information have been reviewed by Virginia.

---

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

**SLR Notes:**

Yes. Again, materials and information being disseminated by each of the operators is reviewed.

---

<b>16</b>	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:**

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<b>17</b>	Part I: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only
-----------	---	-----------	-----------

**SLR Notes:**

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