



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

1200 New Jersey Avenue SE
Washington DC 20590

2009 Natural Gas 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 -- Incident Investigations
- E -- Damage Prevention Initiatives
- F -- Field Inspection
- G -- PHMSA Initiatives - Strategic Plan
- H -- Miscellaneous
- I -- Program Initiatives



2009 Natural Gas State Program Evaluation -- CY 2009

Natural Gas

State Agency: Alabama

Rating:

Agency Status:

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

Date of Visit: 07/19/2010 - 07/22/2010

Agency Representative: Wallace R. Jones, Sr., Gas Pipeline Safety Administrator, Alabama Public Service Commission

PHMSA Representative: Don Martin, State Programs Coordinator, Office of State Programs

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 Street, RSA Union Suite 836
City/State/Zip: Montgomery, Alabama 36104

INSTRUCTIONS:

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2009 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. A deficiency in any one part of a multiple part question should be scored as needs improvement. Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual certification/agreement attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART F):

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

Scoring Summary

		Possible Points	Points Scored
PARTS			
A	General Program Qualifications	26	26
B	Inspections and Compliance - Procedures/Records/Performance	23.5	23.5
C	Interstate Agent States	0	0
D	Incident Investigations	6	6
E	Damage Prevention Initiatives	9	9
F	Field Inspection	11	11
G	PHMSA Initiatives - Strategic Plan	9	8.5
H	Miscellaneous	3	3
I	Program Initiatives	9	9
TOTALS		96.5	96
State Rating			99.5

PART A - General Program Qualifications

Points(MAX) Score

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

SLR Notes:

The APSC submitted complete information on its 2010 Certification. There was an error in that FedStar did not save an entry for the number of compliance actions taken.

2	Did the state have an adequate mechanism to receive operator reporting of incidents to ensure state compliance with 60105(a) Certification/60106(a) Agreement requirements (fatality, injury requiring hospitalization, property damage exceeding \$50,000 - Mechanism should include receiving "after hours" reports)? (Chapter 6) Previous Question A.2 Yes = 1 No = 0	1	1
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SLR Notes:

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.

3	Has the state held a pipeline safety TQ seminar(s) in the last 3 years? (NOTE: Indicate date of last seminar or if state requested seminar, but T&Q could not provide, indicate date of state request for seminar. Seminars must be held at least once every 3 calendar years.) (Chapter 8.5) Previous Question A.4 Yes = 2 No = 0	2	2
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SLR Notes:

The APSC holds a seminar each year. The last seminar was conducted in December, 2009.

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

The APSC maintains hard copy files and electronic files. The inspection reports for 2009 were easy to access for a random selection of reports to review. The inspection reports kept in electronic files were easily accessed.

5	Did state records and discussions with the state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? (Chapter 4.1, Chapter 8.1) Previous Question A.6 Yes = 2 No = 0 Needs Improvement = 1	2	2
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SLR Notes:

Yes. Wallace Jones, Administrator of the APSC, has greatly improved his 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 NAPSRS initiatives.

6	Did the state respond in writing within 60 days to the requested items in the Chairman's letter following the Region's last program evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8 Yes = 1 No = 0	1	1
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SLR Notes:

The APSC Chairman was not requested to provide a response.

7	What actions, if necessary, did the State initiate as a result of issues raised in the Chairperson's letter from the previous year? Did actions correct or address deficiencies from previous year's evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8/A.9	1	1
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Yes = 1 No = 0

SLR Notes:

The APSC was not requested to initiate any actions related to issues identified in the Chairman's letter. The APSC did create a process to rank risks on a relative basis to schedule its inspections.

Personnel and Qualifications

- | | | | |
|----------|--|---|---|
| 8 | Has each inspector fulfilled the 3 year TQ training requirement? If No, has the state been granted a waiver regarding TQ courses by the Associate Administrator for Pipeline Safety? (NOTE: If the State has new inspectors who have not attended all TQ courses, but are in a program which will achieve the completion of all applicable courses within 3 years of taking first course (5 years to successfully complete), or if a waiver has been granted by the applicable Region Director for the state, please answer yes.) (Chapter 4.4) Previous Question A.10 | 3 | 3 |
|----------|--|---|---|
- Yes = 3 No = 0

SLR Notes:

All inspectors whose training period has past the three year deadline have completed the required courses. The remaining inspectors are on schedule to complete the training requirement.

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

For State Personnel:
All staff members attended ANGA fall and spring conferences.

For Operators:
The APSC has a staff member dedicated to training. This person taught topics such as fire training, plastic pipe fusion, static electricity and cathodic protection for operators during 2009.

For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:
The APSC participated with the Alabama One Call Center for training with all stakeholders including the public. | Info Only | Info Only |
|----------|--|-----------|-----------|

SLR Notes:

See above.

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|-----------|---|---|---|
| 10 | Did the lead inspectors complete all required T&Q OQ courses and Computer Based Training (CBT) before conducting OQ Inspections? (Chapter 4.4.1) Previous Question A.12 | 1 | 1 |
|-----------|---|---|---|
- Yes = 1 No = 0

SLR Notes:

Yes. All inspectors that have lead OQ inspections completed the OQ CBT training course in 2003. Inspectors that have not completed the OQ training, have not lead OQ inspections.

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

SLR Notes:

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

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

SLR Notes:

The APSC had 1128 inspection person days during 2009 with 8.92 person years assigned to the program. The resulting ratio calculated to be 0.57 which exceeds the minimum ratio of 0.38.



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

SLR Notes:

There were no changes to the APSC's approved level of inspection staff.

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

SLR Notes:

The APSC has generally complied with the requirements contained in Part A.

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 including LNG) (Chapter 5.1) Previous Question B.1 + Chapter 5 Changes + Incorporate LNG
<small>Yes = 6.5 No = 0 Needs Improvement = 50% Deduction</small> | 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, including LNG, 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 Gas IMP Program inspections have been completed.

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| 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
<small>Yes = 2 No = 0 Needs Improvement = 50% Deduction</small> | 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 intends to implement in the future to verify the scheduling of inspections.

Inspection Performance

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|----------|---|---|---|
| 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
<small>Yes = 2 No = 0</small> | 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 2010 Certification - Attachment 1 that all operators and units were inspected during 2009.

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| 4 | Did the state inspection form cover all applicable code requirements addressed on the Federal Inspection forms? (Chapter 5.1 (3)) Previous Question B.4
<small>Yes = 1 No = 0</small> | 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 Gas IMP inspections.

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

Upon a review of randomly selected inspection files, applicable portions of the forms were completed; however, additional documentation could be provided as to why a portion was deemed not applicable or not covered.

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

There were no safety related condition reports filed during 2009.

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

The APSC reviewed all operator's O&M Procedures for this requirement soon after the NTSB issued its recommendation. The APSC continues to review this requirement as it inspects operators' O&M Procedures since the NTSB recommendation.

8	Did the state review operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance) (NTSB) Previous Question B.8 Yes = .5 No = 0	.5	.5
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SLR Notes:

The APSC reviewed all operator's O&M Procedures for this requirement soon after the NTSB issued its recommendation. The APSC continues to review this requirement as it inspects operators' O&M Procedures.

9	Did the state review operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21? (NTSB) Previous Question B.9 Yes = .5 No = 0	.5	.5
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SLR Notes:

Yes. The APSC reviews leak management procedures while reviewing operators' O&M Procedures and reviews leak records to insure that operators are investigating the migration of gas when locating and repairing leaks.

10	Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 192.617? (NTSB) Previous Question B.10 Yes = 1 No = 0	1	1
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SLR Notes:

Yes. The APSC covers the requirements of 192.617 on its inspection checklist form during each standard inspection.

Compliance - 60105(a) States

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

Upon a review of randomly selected inspection files, each probable violation noted in non-compliance letters to operators had documentation of the actions the operators failed to take to comply with the regulations.

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

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.

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

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



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

Yes. 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.

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

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

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

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

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

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

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

Upon a review of randomly selected inspection files, it appears the APSC is following through with the resolution of probable violations. 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.

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

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.

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

Yes. The APSC's procedures and rules 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 position in a "show cause" hearing before a presiding officer or the commission.

Compliance - 60106(a) States

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

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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



PART C - Interstate Agent States

Points(MAX) Score

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

SLR Notes:

The APSC is not an interstate agent.

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

SLR Notes:

The APSC is not an interstate agent.

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

SLR Notes:

The APSC is not an interstate agent.

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

SLR Notes:

The APSC is not an interstate agent.

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

SLR Notes:

The APSC is not an interstate agent.

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

SLR Notes:

The APSC is not an interstate agent.

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

SLR Notes:

The APSC is not an interstate agent.

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

SLR Notes:

The APSC is not an interstate agent.

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



PART D - Incident Investigations

Points(MAX) Score

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

SLR Notes:

The APSC's staff exhibited knowledge of their responsibilities in the Federal/State cooperation of handling natural gas pipeline incidents. The APSC cooperated with PHMSA's Southern Region Office during the initial phase of the incident investigations.

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

SLR Notes:

Yes. The APSC program manager and staff exhibited knowledge of the understandings between the NTSB and PHMSA outlined in the Memorandum of Understanding contained in the Guidelines.

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

SLR Notes:

The APSC maintains a log of incident reports as they are telephonically reported to the National Response Center. The APSC investigates all incidents that meet the federal reporting requirements. Reports and documentation of each incident investigated is maintained in the APSC's files.

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

SLR Notes:

The APSC investigated all incidents on site during 2009. This question is not applicable since the APSC did not investigate other than being on site.

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

One natural gas pipeline incident occurred during 2009. The APSC investigated the incident on site. The investigation documentation indicated that a thorough investigation was performed to determine if the operator's system in the area of the incident was operated and maintained in compliance with pipeline safety regulations. The APSC concluded that an electrical short between the service line and an underground water line caused the a release of gas from the service line that contributed to the gas explosion within the residence.

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

SLR Notes:

There were no probable violations found in the investigation of the incident that occurred in Crossville, AL in 2009.

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|---|--|----|-----|
| 7 | Did the state assist region office by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate annual report data from operators concerning incidents/accidents and investigate discrepancies) (Chapter 6) Previous Question E.7/E.8
Yes = .5 No = 0 | .5 | 0.5 |
|---|--|----|-----|

SLR Notes:

Yes. The Southern Region Office provided information in an email on 7/20/2010 that affirmed that the APSC's cooperation was satisfactory.

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

SLR Notes:

The APSC has generally complied with Part D requirements.

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



PART E - Damage Prevention Initiatives

Points(MAX) Score

- | | | | |
|----------|--|---|---|
| 1 | Has the state reviewed directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies? Previous Question B.11
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

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

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

SLR Notes:

The APSC reviews operators' damage prevention program annually when it conducts a standard inspection. This is covered under 192.614 of the APSC's inspection checklist form.

- | | | | |
|----------|---|---|---|
| 3 | Did the state encourage and promote the adoption of the Common Ground Alliance Best Practices document to its regulated companies as a means of reducing damages to all underground facilities? Previous Question A.7
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

Wallace Jones participates in the Alabama Damage Prevention Council where he has encouraged stakeholder representatives to use CGA Best Practices. The APSC has also included a discussion of certain best practices in its annual pipeline safety seminar.

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

SLR Notes:

The APSC has developed this information since last year by obtaining damage information from operators and number of tickets per operator from Alabama One Call Center. The APSC uses this information in relative risk ranking model.

- | | | | |
|----------|--|---|---|
| 5 | Did the state review operators' records of accidents and failures due to excavation damage to ensure causes of failure are addressed to minimize the possibility of recurrence as required by 192.617?
Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

Yes. The APSC reviews operators' compliance with damage prevention requirements under 192.614 and operators' records pertaining to 192.617 as part of its standard inspection. Excavation damage related failures and repairs are part of this information.

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

SLR Notes:

The APSC has generally complied with the requirements of Part E.

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:
 Alabama Gas Corporation (Alagasco)
 Name of State Inspector(s) Observed:
 Harold Dunson and Hosie Powell
 Location of Inspection:
 Birmingham Service Center, 10th Street, Birmingham, AL
 Date of Inspection:
 4/21-22/2010
 Name of PHMSA Representative:
 Don Martin

SLR Notes:

Harold Dunson lead the inspection for the APSC. Hosie Powell assisted Harold. On 4/21/2010, Mr.s Dunson and Powell reviewed Alagasco's Public Awareness and Drug and Alcohol Program requirements and records for Alagasco's entire pipeline system. Alagasco was represented by Bob Gardner, Manager of Operations and Regulatory Compliance, during the Public Awareness portion of the inspection. On 4/22/2010, Alagasco's Operator Qualification Program was reviewed.

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 operator was provided with written on March 24, 2010. Operator personnel were present all through 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 F.2 2 2
Yes = 2 No = 0

SLR Notes:

The APSC inspectors used a form developed by the APSC which covered the requirements for Public Awareness. The form appeared to cover the requirements for 192.614. Drug and Alcohol and Operator Qualification Forms?

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

SLR Notes:

Yes. The APSC completed the inspection forms for each of the regulatory items covered. All entry blanks were completed on the forms.

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

SLR Notes:

Cathodic protection test readings are scheduled for 7/20, 21, 22 and overpressure protection and other facility inspection testing for August 9,10,11 and 12. This part of the inspection did not require test equipment. This question is not applicable.

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 conducted a standard inspection of Alagasco's Birmingham inspection unit. The APSC also conducted a system wide review of Alagasco's Public Awareness, Drug and Alcohol and Operator Qualification Programs. An Operator Qualification Protocol 9 inspection was conducted while observing operator's personnel perform certain covered tasks.

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 operator's operation and maintenance procedures were evaluated for adequacy during a previous review. There had been no revisions to the procedures since the review and therefore was not necessary during this inspection. Records were inspected for the standard inspection portion of the Birmingham unit. The operator's Public Awareness and Drug/Alcohol Programs were reviewed. An Operator Qualification Protocol 9 inspection was conducted for certain covered tasks.

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

SLR Notes:

Yes. The two APSC inspectors exhibited good knowledge of the regulations that were covered during the inspection. Both have been pipeline safety inspectors for some time.

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

SLR Notes:

Yes, Harold summarized the results of his inspection this day with the operator

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

SLR Notes:

There were no probable violations found during this day of the inspection.

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

SLR Notes:

Cathodic protection readings and the observation of performing Operator Qualification tasks was conducted in the field. The inspectors were thorough and conducted an effective inspection.

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

SLR Notes:

There were no best practices observed that warranted communication with other states.

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

- a. Abandonment
- b. Abnormal Operations
- c. Break-Out Tanks
- d. Compressor or Pump Stations
- e. Change in Class Location
- f. Casings
- g. Cathodic Protection
- h. Cast-iron Replacement
- i. Damage Prevention
- j. Deactivation
- k. Emergency Procedures
- l. Inspection of Right-of-Way
- m. Line Markers
- n. Liaison with Public Officials
- o. Leak Surveys



- p. MOP
- q. MAOP
- r. Moving Pipe
- s. New Construction
- t. Navigable Waterway Crossings
- u. Odorization
- v. Overpressure Safety Devices
- w. Plastic Pipe Installation
- x. Public Education
- y. Purging
- z. Prevention of Accidental Ignition
- A. Repairs
- B. Signs
- C. Tapping
- D. Valve Maintenance
- E. Vault Maintenance
- F. Welding
- G. OQ - Operator Qualification
- H. Compliance Follow-up
- I. Atmospheric Corrosion
- J. Other

SLR Notes:

The items checked above were covered during the inspection but may have occurred outside of the dates that the evaluation observation took place.

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 during the portion of the inspection that was observed.

Total points scored for this section: 11

Total possible points for this section: 11



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 that will be used for inspection planning in 2010.

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

SLR Notes:

The DIMP proposed rulemaking is not final at this time. The APSC could include this consideration in the future but is not at this time.

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

SLR Notes:

The APSC inspects operators and units annually. The APSC does target specific areas to focus a standard inspection such as operators with cast iron mains and unprotected bare steel pipelines or a high frequency of leak repairs. The APSC monitors cast iron replacement programs of operators. The APSC created a spreadsheet system to collect data on risks to pipeline safety in Alabama. The APSC will be inputting the data it collects in the future to evaluate high risk areas.

Use of Data to Help Drive Program Priority and Inspections

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

SLR Notes:

The APSC has developed the data gathering process to begin the analysis. The APSC cannot complete an effective analysis until more data is gathered over time. The APSC is a participant in the Alabama Damage Prevention Council which has an interest in damage prevention effectiveness.

6 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.

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

SLR Notes:

The APSC has identified lost and unaccounted anomalies and contacted operators for explanations. The APSC reviews mileage counts for cast iron and bare steel mains to evaluate the trend of replacements. The APSC also reviews the number of leak repairs reported by operators.

8 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 Incident Reports filed by operators. The APSC insures that the operator's report is consistent with findings in the APSC's investigation report.

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

SLR Notes:

The APSC has developed the measures that it wants to analyze for program effectiveness; however, the APSC has just begun collecting the needed data. The APSC will not be able to perform an evaluation until it has a sufficient amount of data.

10	Did the State input all operator qualification inspection results into web based database provided by PHMSA in a timely manner upon completion of OQ inspections? Previous Question B.15	.5	0.5
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Yes = .5 No = 0

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). These inspections were conducted prior to 2009.

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

SLR Notes:

There were no notifications during 2009.

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

SLR Notes:

Yes. The APSC has uploaded all of the IMP Federal Protocol forms for completed IMP inspections. The APSC focused on improving its performance in this area during 2009.

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

SLR Notes:

The APSC has included an item on its inspection forms which covers the issue of plastic pipe and component failures. Two of the largest operators in Alabama participate in the Plastic Pipe Database initiative.

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

SLR Notes:

The APSC now includes as part of its IMP inspections a discussion with operators on their submission of updates to the National Pipeline Mapping System.

Accident/Incident Investigation Learning and Sharing Lessons Learned

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

SLR Notes:

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

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

SLR Notes:

The APSC gathers data as part of the incident investigation. There have been no requests made to the APSC asking for data concerning incidents.

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

SLR Notes:

Wallace Jones recently completed the root cause analysis training and is considering how to implement the techniques into its incident investigation process.

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

SLR Notes:

There have not been any incidents to occur since the root cause training was completed by the Wallace Jones. The APSC is considering how to implement the techniques into its investigation process.

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

SLR Notes:

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

Transparency - Communication with Stakeholders

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

SLR Notes:

The APSC participates in and makes presentations at the ANGA Roundtable and Spring Meetings. The APSC posts pipeline safety information on the Commission's website.

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

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

SLR Notes:

The APSC has generally complied with the requirements of Part G.

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



PART H - Miscellaneous

Points(MAX) Score

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

SLR Notes:

Developed a risk ranking spreadsheet for inspection scheduling. The APSC obtained a substantial amount of training at Training and Qualification during 2009. The APSC conducted a well attended and effective pipeline safety seminar during 2009. The APSC began its participation in the newly formed Alabama Damage Prevention Council.

Wallace - DIMP Implementation Task Group
SHRIMP (DIMP) For Small Operators
Grant Allocation Staffing Formula
Judy - Gas Gathering Line Task Group
Research and Development Task Group

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

SLR Notes:

Introduction of new bill to change Alabama One Call Law to prevent underground facility owners from seeking damages if they did not accurately mark their facilities or mark them within an allowed time.

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

SLR Notes:

There was a considerable amount of cast iron main replacement projects that were completed in 2009. The mileage of cast iron mains is trending downward in Alabama. 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.

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

SLR Notes:

Yes. Responded to all requests - furlough days, fire first events, non-federal fees, state budget cuts

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

SLR Notes:

NAPSR meetings. Risk ranking spreadsheet states

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

SLR Notes:

The APSC has generally complied with the requirements of Part H.

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



PART I - Program Initiatives

Points(MAX) Score

Drug and Alcohol Testing (49 CFR Part 199)

- | | | | |
|----------|---|---|---|
| 1 | Has the state verified that operators have drug and alcohol testing programs?
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 ninety one drug and alcohol inspections during 2009.

- | | | | |
|----------|--|----|-----|
| 2 | Is the state verifying that operators are conducting the drug and alcohol tests required by the operators program (random, post-incident, etc.)
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 this inspection.

- | | | | |
|----------|---|----|-----|
| 3 | Is the state verifying that any positive tests are responded to in accordance with the operator's program?
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 192 Subpart N)

- | | | | |
|----------|---|---|---|
| 4 | Has the state verified that operators have a written qualification program?
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 over 100 inspections on Protocol 9 of the OQ inspection protocols. The APSC continued reviewing the field portion (Protocol 9) of Part 192, Subpart N during 2009.

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

SLR Notes:

The APSC reviewed all operators' OQ written programs prior to 2008. The APSC continually reviews the requirements covered by Protocol 9 during its standard inspections.

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

SLR Notes:

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

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

SLR Notes:

Yes. This concern is being addressed as Protocol 9 is covered in its standard inspections of operators.

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

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

SLR Notes:

Yes. The APSC has conducted the integrity management programs of all gas transmission operators. The APSC placed a high priority on completing these reviews in 2009.

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

SLR Notes:

The Gas IMP database indicates that the APSC has reviewed Protocols A.01 through A.06 with operators' plans during its inspections. The APSC has completed Gas IMP inspections on all gas transmission operators.

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

Yes. The APSC uses the federal protocol forms which cover all requirements of Subpart O. The APSC has completed IMP inspections for all gas transmission operators.

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

Yes. The APSC completes the federal protocol forms during its inspections. Protocols B.01 through E.04 cover these requirements.

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

Yes. The APSC completes the federal protocol forms during its inspections. Protocol B.04 covers this requirement.

Public Awareness (49 CFR Section 192.616)

13	Has the state verified that each operator has developed a continuing public awareness program? (due date was 6/20/06 for most operators, 6/20/07 for certain very small operators,6/13/08 for master meters) Yes = .5 No = 0	.5	0.5
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SLR Notes:

Yes. Prior to 2008, the APSC completed a review of all operators Public Awareness Plans for compliance with 192.616 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 192.616 (by participating in the Clearinghouse or by other means)? Yes = .5 No = 0	.5	0.5
-----------	--	----	-----

SLR Notes:

Yes. The APSC completed a review of all operators Public Awareness Plans for compliance with 192.616 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? Yes = .5 No = 0	.5	0.5
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SLR Notes:

Yes. The APSC has incorporated the new requirements in 192.616 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 = No Points	Info Only	Info Only
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SLR Notes:

The APSC is planning to start this review in 2010 since operators were not required to complete their evaluations until June, 2010.

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

The APSC has generally complied with the requirements of Part I.

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