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

1200 New Jersey Avenue SE
Washington DC 20590

2013 Hazardous Liquid State Program Evaluation

for

Washington Utilities and Transportation Commission

Document Legend
PART:

- O -- Representative Date and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- Program Performance
- D -- Compliance Activities
- E -- Accident Investigations
- F -- Damage Prevention
- G -- Field Inspections
- H -- Interstate Agent State (if applicable)
- I -- 60106 Agreement State (if applicable)

2013 Hazardous Liquid State Program Evaluation -- CY 2013

Hazardous Liquid

State Agency: Washington **Rating:**
Agency Status: **60105(a):** Yes **60106(a):** No **Interstate Agent:** Yes
Date of Visit: 06/02/2014 - 06/05/2014
Agency Representative: Joe Subsits, David Lyyken
PHMSA Representative: Rex Evans, Michael Thompson
Commission Chairman to whom follow up letter is to be sent:
Name/Title: David Danner, Chairman
Agency: Washington Utilities and Transporation Commission
Address: 1300 S. Evergreen Parkway
City/State/Zip: Olympia, WA 98504

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 2013 (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 then 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 progress report attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART G):

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 G, the PHMSA representative should include a written summary which thoroughly documents the inspection.

Scoring Summary

PARTS		Possible Points	Points Scored
A	Progress Report and Program Documentation Review	10	10
B	Program Inspection Procedures	15	15
C	Program Performance	43	43
D	Compliance Activities	15	15
E	Accident Investigations	4	4
F	Damage Prevention	8	8
G	Field Inspections	12	12
H	Interstate Agent State (if applicable)	7	7
I	60106 Agreement State (if applicable)	0	0
TOTALS		**114**	**114**

State Rating **100.0**

PART A - Progress Report and Program Documentation Review

		Points(MAX)	Score
1	Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1 (A1a) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

Information reviewed was accurate

2	Review of Inspection Days for accuracy - Progress Report Attachment 2 (A1b) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

The 126.8 days of inspection listed matched the information reviewed on WUTC spreadsheets.

3	Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3 (A1c) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

Information was compared with the PDM and looks accurate.

4	Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4 (A1d) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

No federally reportable incidents listed by WUTC and none were found on PDM.

5	Accuracy verification of Compliance Activities - Progress Report Attachment 5 (A1e) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

Records reviewed - No Issues.

6	Were pipeline program files well-organized and accessible? - Progress Report Attachment 6 (A1f, A4) Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:

Pipeline program files were well organized and accessible. No Issues.

7	Was employee listing and completed training accurate and complete? - Progress Report Attachment 7 (A1g) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

Information from Training and Qualifications appears accurate.

8	Verification of Part 195,198,199 Rules and Amendments - Progress Report Attachment 8 (A1h) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

All rules and amendments adopted by WUTC appear to be up to date. No Issues

9	List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10 (H1-3) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

Yes, WUTC has described it's planned performance and accomplishments in detail on their progress report. No Issues

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10 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

Total points scored for this section: 10

Total possible points for this section: 10

PART B - Program Inspection Procedures

		Points(MAX)	Score
1	Standard Inspections (B1a) Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:

Procedures found in sections 14, 15 and 16 of WUTC manual. No Issues.

		Points(MAX)	Score
2	IMP Inspections (B1b) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

Procedures found in sections 22, 23 and 36 of WUTC manual. No Issues.

		Points(MAX)	Score
3	OQ Inspections (B1c) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

Procedures found in sections 17 of WUTC manual. No Issues.

		Points(MAX)	Score
4	Damage Prevention Inspections (B1d) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

Procedures found in sections 15, 16 and 31 of WUTC manual. No Issues.

		Points(MAX)	Score
5	On-Site Operator Training (B1e) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

Procedures found in sections 27 of WUTC manual. No Issues.

		Points(MAX)	Score
6	Construction Inspections (B1f) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

Procedures found in sections 21 of WUTC manual. No Issues.

		Points(MAX)	Score
7	Incident/Accident Investigations (B1g) Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:

Procedures found in sections 19, 20 and 24 of WUTC manual. No Issues.

		Points(MAX)	Score
8	Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? (B2a-d, G1,2,4) Yes = 6 No = 0 Needs Improvement = 1-5	6	6

Element	Yes	No	Needs Improvement
a. Length of time since last inspection	◉	○	○
b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)	◉	○	○
c. Type of activity being undertaken by operators (i.e. construction)	◉	○	○
d. Locations of operators inspection units being inspected - (HCA's, Geographic area, Population Density, etc)	◉	○	○
e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors)	◉	○	○
f. Are inspection units broken down appropriately?	◉	○	○

Evaluator Notes:

Procedures found in sections 13 of WUTC manual. No Issues.

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9 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

Total points scored for this section: 15

Total possible points for this section: 15

PART C - Program Performance

		Points(MAX)	Score
1	Was ratio of Total Inspection person-days to total person days acceptable?	5	5

Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):
126.83

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 1.18 = 258.68

Ratio: A / B
126.83 / 258.68 = 0.49

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

Evaluator Notes:

No Issues, 126.8 inspection days

		Points(MAX)	Score
2	Has each inspector and program fulfilled the T Q Training Requirements? (See Guidelines for requirements) Chapter 4.4 (A8-A11, G19)	5	5

Yes = 5 No = 0 Needs Improvement = 1-4

		Yes	No	Needs Improvement
a.	Completion of Required OQ Training before conducting inspection as lead?	◉	○	○
b.	Completion of Required IMP Training before conducting inspection as lead	◉	○	○
c.	Root Cause Training by at least one inspector/prgram manager	◉	○	○
d.	Note any outside training completed	◉	○	○

Evaluator Notes:

No issues - All inspectors given opportunity for required TQ courses. The program also had outside training through NACE, and Wormelli's -Welding Inspection and held a GEO hazards course at their facilities.

		Points(MAX)	Score
3	Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1 (A5)	2	2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

No Issues, both the Program Manager - David Lykken and Joe Susbsits - Chief Engineer have many years of experience.

		Points(MAX)	Score
4	Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1 (A6-7)	2	2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

No response requested in Chairman's letter.

		Points(MAX)	Score
5	Did State hold PHMSA TQ Seminar in Past 3 Years? Chapter 8.5 (A3)	2	2

Yes = 2 No = 0

Evaluator Notes:

Last Seminar held on 5/12/11, with plans to hold a seminar on 4/22-23/2014 in Olympia.

		Points(MAX)	Score
6	Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1 (B3)	5	5

Yes = 5 No = 0 Needs Improvement = 1-4

Evaluator Notes:

Records reviewed indicate that all operators were inspected within the planned time intervals.

7	Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1 (B4-5) Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:

Yes, all applicable codes on federal forms and state specific requirements are listed on the inspection forms used by the WUTC.

8	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) (B7) Yes = 1 No = 0	1	1

Evaluator Notes:

Yes, this area is covered in their check list and the inspectors have all been NACE trained.

9	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) (B8) Yes = 1 No = 0	1	1

Evaluator Notes:

Yes the state has developed their own GIS system with layers for HCAs and environmentally sensitive areas.

10	Is the state aware of environmentally sensitive areas traversed by or adjacent to hazardous liquid pipelines? (reference Part 195, review of NPMS) (B9) Yes = 1 No = 0	1	1

Evaluator Notes:

The state has developed their own GIS system with these areas on a single layer.

11	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)? (B10,E5) Yes = 1 No = 0	1	1

Evaluator Notes:

There was no damages to liquid facilities in 2013. They did respond to some close calls/encroachment.

12	Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues? Data Initiative (G5-8,G15) Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:

Yes, it is reviewed for accuracy and analyzed for issues and also used for billing of operators for inspection time.

13	Did state input all applicable OQ, IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1 (G9-12) Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:

Yes, but they are struggling a little with getting information for PA uploaded to federal data base system. The inspector is responsible for input and uploading. Then the Chief, Engineer reviews and monitors uploaded information on a quarterly basis.

14	Has state confirmed intrastate operators have submitted information into NPMS database along with changes made after original submission? (G13) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

Yes, they send an letter annually to all operators to remind them of this requirement.

15	Is the state verifying operators are conducting drug and alcohol tests as required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199 (I1-3) Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:

Yes, no issues.

16	Is state verifying operators OQ programs are up to date? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals determined in the operators plan. 49 CFR 195 Part G (I4-7) Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:

Yes, OQ field inspections are being conducted and full plan inspections are scheduled to be completed every five years.

17	Is state verifying operator's hazardous liquid integrity management (L IMP) Programs are up to date? This should include a previous review of LIMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 195.452 Appendix C (C8-12) Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:

Yes, the procedure is found in section 23 of the WUTC manual. Plans will be reviewed in 2014.

18	Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. 49 CFR 195.440 (I13-16) PAPEI Effectiveness Inspections should be complete by December 2013 Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:

Yes, the procedure is found in section 30 of the WUTC manual, and inspection records are posted on their web site.

19	Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public). (G19-20) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

Yes, all inspection and compliance documents are posted on the WUTC public web site.

20	Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 (B6) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

Yes, WUTC is providing inspection for all anomaly digs TOSORO is doing to meet the requirement s PHMSA placed on the operator for issues found in Utah.

21	Did the state participate in/respond to surveys or information requests from NAPSR or PHMSA? (H4) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

Yes, they responded to all formal NAPSR surveys.

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22 If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate. Info Only Info Only

Info Only = No Points

Evaluator Notes:

No SPs have been issued during 2013.

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23 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

Total points scored for this section: 43

Total possible points for this section: 43

PART D - Compliance Activities

		Points(MAX)	Score
1	Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1 (B12-14, B16, B1h)	4	4

Yes = 4 No = 0 Needs Improvement = 1-3

a. Procedures to notify an operator (company officer) when a noncompliance is identified — Yes ◉ No ○ Needs Improvement ○

b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns — Yes ◉ No ○ Needs Improvement ○

Evaluator Notes:

Yes, the procedures are found ion section 15 of the WUTC manual

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		Points(MAX)	Score
2	Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1 (B11,B18,B19)	4	4

Yes = 4 No = 0 Needs Improvement = 1-3

a. Were compliance actions sent to company officer or manager/board director if municipal/government system? — Yes ◉ No ○ Needs Improvement ○

b. Were probable violations documented? — Yes ◉ No ○ Needs Improvement ○

c. Were probable violations resolved? — Yes ◉ No ○ Needs Improvement ○

d. Was the progress of probable violations routinely reviewed? — Yes ◉ No ○ Needs Improvement ○

Evaluator Notes:

Yes, No issues with compliance actions reviewed.

		Points(MAX)	Score
3	Did the state issue compliance actions for all probable violations discovered? (B15)	2	2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

No Issues.

		Points(MAX)	Score
4	Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary. (B17, B20)	2	2

Yes = 2 No = 0

Evaluator Notes:

Yes, procedures found in section 34 of WUTC manual.

		Points(MAX)	Score
5	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) (B27)	2	2

Yes = 2 No = 0

Evaluator Notes:

Yes, there were no civil penalties issued to liquid operators in 2013.

		Points(MAX)	Score
6	Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations?	1	1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, previous civil penalties have been issued to hazardous liquid operators in the state and were issued during 2013 to an operator in the natural gas program.

		Points(MAX)	Score
7	General Comments:	Info Only	Info Only

Info Only = No Points

Evaluator Notes:

Total points scored for this section: 15
Total possible points for this section: 15

PART E - Accident Investigations

	Question	Points(MAX)	Score
1	Does state have adequate mechanism to receive and respond to operator reports of accidents, including after-hours reports? And did state keep adequate records of Incident/Accident notifications received? Chapter 6 (A2,D1-3) Yes = 2 No = 0 Needs Improvement = 1	2	2

a. Acknowledgement of MOU between NTSB and PHMSA (Appendix D) — Yes ◉ No ○ Needs Improvement ○

b. Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E) — Yes ◉ No ○ Needs Improvement ○

Evaluator Notes:

Yes, the procedures are found in sections 10 & 19 of the WUTC manual, and there is a person from the program on call 24/7.

	Question	Points(MAX)	Score
2	If onsite investigation was not made, did state obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 (D4) Yes = 1 No = 0 Needs Improvement = .5	1	NA

Evaluator Notes:

No incidents during 2013.

	Question	Points(MAX)	Score
3	Were all accidents investigated, thoroughly documented, and with conclusions and recommendations? (D5) Yes = 3 No = 0 Needs Improvement = 1-2	3	NA

a. Observations and document review — Yes ○ No ○ Needs Improvement ◉

b. Contributing Factors — Yes ○ No ○ Needs Improvement ◉

c. Recommendations to prevent recurrences where appropriate — Yes ○ No ○ Needs Improvement ◉

Evaluator Notes:

No hazardous liquids incidents in 2013

	Question	Points(MAX)	Score
4	Did the state initiate compliance action for violations found during any incident/accident investigation? (D6) Yes = 1 No = 0	1	NA

Evaluator Notes:

No hazardous liquids incidents in 2013. WUTC did initiate actions for violations found in an incident in the natural gas program for 2013.

	Question	Points(MAX)	Score
5	Did the state assist region office by taking appropriate follow-up actions related to the operator accident reports to ensure accuracy and final report has been received by PHMSA? (validate report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 (D7) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

No hazardous liquids incidents in 2013, but the WIUTC did help the western region with the Tesoro agreement.

	Question	Points(MAX)	Score
6	Does state share lessons learned from incidents/accidents? (sharing information, such as: at NAPSR Region meetings, state seminars, etc) (G15) Yes = 1 No = 0	1	1

Evaluator Notes:

Yes, the state shares information at the NAPSR western region meeting and posts all inspection and compliance documents on its web site.

	Question	Points(MAX)	Score
7	General Comments: Info Only = No Points	Info Only	Info Only

Evaluator Notes:

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

PART F - Damage Prevention

		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? (E1) Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:

Yes, this item is part of the inspection checklist and discussed with operators.

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? (E2) Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:

Yes, this is part of the inspection checklist.

3	Did the state encourage and promote practices for reducing damages to all underground facilities to its regulated companies? (i.e. such as promoting/adopting the CGA Best Practices encouraging adoption of the 9 Elements, etc.) (E3) Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:

Yes, the WUTC has been very active for many years and was instrumental in the creation and adoption of the new state one call law.

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? (This can include DIRT and other data shared and reviewed by the pipeline safety program) (E4,G5) Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:

Yes, the information is collected and analyzed operator reported damages on the states DIRT site.

5	General Comments: Info Only = No Points	Info Only	Info Only

Evaluator Notes:

Total points scored for this section: 8
Total possible points for this section: 8

PART G - Field Inspections

		Points(MAX)	Score
1	Operator, Inspector, Location, Date and PHMSA Representative Info Only = No Points	Info Only	Info Only

Name of Operator Inspected:
SwissPort

Name of State Inspector(s) Observed:
David Collum

Location of Inspection:
Sea-Tac (Seattle)

Date of Inspection:
6/3/2014

Name of PHMSA Representative:
Rex Evans - Michael Thompson

Evaluator Notes:
The inspection was a standard inspection of an intrastate hazardous liquids operator.
(breakout tank)

		Points(MAX)	Score
2	Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? (F2) Yes = 1 No = 0	1	1

Evaluator Notes:
Yes, the operators representatives were notified and present during the inspection.

		Points(MAX)	Score
3	Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) (F3) Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:
Yes, the federal inspection form was used.

		Points(MAX)	Score
4	Did the inspector thoroughly document results of the inspection? (F4) Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:
Yes, he also requested copies of documents to use as part of his inspection. He used an electronic form and kept notes on his laptop.

		Points(MAX)	Score
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) (F5) Yes = 1 No = 0	1	1

Evaluator Notes:
Yes, inspector reviewed the system maps and inspected the fluke and half cell before PS reads were observed as part of the field inspection.

		Points(MAX)	Score
6	Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) (F7) Yes = 2 No = 0 Needs Improvement = 1	2	2

a.	Procedures	☒
b.	Records	☒
c.	Field Activities	☒
d.	Other (please comment)	☐

Evaluator Notes:
Yes, the inspector reviewed the OQ records, training records, maintenance records and procedures in the operators O&M manual.

7	Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) (F8) Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:

Yes, his questions and discussions with the operators representative showed he had adequate knowledge of the pipeline safety program.

8	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) (F9) Yes = 1 No = 0	1	1

Evaluator Notes:

Yes, although the inspection was not complete, the inspector covered the issues and concerns he had from the days inspection and briefed the operators representative on plan for the following days inspection.

9	During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable) (F10) Yes = 1 No = 0	1	1

Evaluator Notes:

Yes, there were no PVs at the end of this days inspection, but the inspector did discuss some concerns he had that might possibly become PV's after further evaluation during this inspection.

10	General Comments: What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) Other Info Only = No Points	Info Only	Info Only

- 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	☐

Evaluator Notes:

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

PART H - Interstate Agent State (if applicable)

		Points(MAX)	Score
1	Did the state use the current federal inspection form(s)? (C1) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

No issues

2	Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? (C2) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

No issues

3	Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? (C3) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

No issues

4	Were 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.) (C4) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

No issues

5	Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (C5) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

No issues

6	Did the state give written notice to PHMSA within 60 days of all probable violations found? (C6) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

No issues

7	Did the state initially submit documentation to support compliance action by PHMSA on probable violations? (C7) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

No issues

8	General Comments: Info Only = No Points	Info Only	Info Only

Evaluator Notes:

Per discussion with PHMSA Western Region office, no issues with Interstate agent activities

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

PART I - 60106 Agreement State (if applicable)

	Question	Points(MAX)	Score
1	Did the state use the current federal inspection form(s)? (B21) Yes = 1 No = 0 Needs Improvement = .5	1	NA

Evaluator Notes:

2	Are results documented demonstrating inspection units were reviewed in accordance with state inspection plan? (B22) Yes = 1 No = 0 Needs Improvement = .5	1	NA

Evaluator Notes:

3	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.) (B23) Yes = 1 No = 0 Needs Improvement = .5	1	NA

Evaluator Notes:

4	Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (B24) Yes = 1 No = 0 Needs Improvement = .5	1	NA

Evaluator Notes:

5	Did the state give written notice to PHMSA within 60 days of all probable violations found? (B25) Yes = 1 No = 0 Needs Improvement = .5	1	NA

Evaluator Notes:

6	Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? (B26) Yes = 1 No = 0 Needs Improvement = .5	1	NA

Evaluator Notes:

7	General Comments: Info Only = No Points	Info Only	Info Only

Evaluator Notes:

Section not applicable

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