

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

2016 Gas State Program Evaluation

for

MISSISSIPPI PUBLIC SERVICE 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 -- Incident Investigations
- F -- Damage Prevention
- G -- Field Inspections
- H -- Interstate Agent State (If Applicable)
- I -- 60106 Agreement State (If Applicable)



2016 Gas State Program Evaluation -- CY 2016

Gas

State Agency: Mississippi

Agency Status:

Date of Visit: 05/22/2017 - 05/26/2017

Agency Representative: Rickey Cotton, Director Pipeline Safety
Ilicia Boaler, Secretary Administrative
Joe Porter, Investigator I

PHMSA Representative: Glynn Blanton, PHMSA State Programs

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

Name/Title: Brandon Presley, Chairman
Agency: Mississippi Public Service Commission
Address: 501 N West Street, Suite 201-A
City/State/Zip: Jackson, MS 39215-1174

Rating:

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

INSTRUCTIONS:

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2016 (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 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

A Progress Report and Program Documentation Review
B Program Inspection Procedures
C Program Performance
D Compliance Activities
E Incident Investigations
F Damage Prevention
G Field Inspections
H Interstate Agent State (If Applicable)
I 60106 Agreement State (If Applicable)

Possible Points Points Scored

10 10
13 10
47 42
15 14
6 6
8 8
12 12
0 0
0 0

TOTALS

111 102

State Rating **91.9**

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

Evaluator Notes:

A review of office files found the Municipal Systems number changed from 43 to 41 due to Mississippi Natural Gas Company purchasing City of Como and Atmos Energy purchasing the City of Friars. Intrastate Transmission number changed from 18 to 16 due to D&L Inc. closing business and Penn Virginia Oil Gas Corp became a part of an Fleur de Lis Energy that is an interstate transmission operator.

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| 2 | Review of Inspection Days for accuracy - Progress Report Attachment 2
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, a review of Attachment 2 found information on the number of inspection days for each category matched the MS PSC data base spreadsheet.

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|----------|----------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 3 | Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

No issues with attachment 3. Operator total inspection units match Attachment 1 document.

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| 4 | Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

No gas incidents/accidents occurred in CY2016. This was checked and verified in Pipeline Data Mart. No areas of concern.

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

Evaluator Notes:

Attachment 5 is correct. Reviewed the compliance action list and found information was correct with the number reported. The number of carryover violations has increased from previous years. Eighty five compliance actions were taken in CY2016 but again no civil penalties were assessed or collected from an operator.

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| 6 | Were pipeline program files well-organized and accessible? - Progress Report Attachment 6
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

Yes, program files and folders, inspection reports, and other related documents were found accessible and well organized.

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|----------|--------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 7 | Was employee listing and completed training accurate and complete? - Progress Report Attachment 7
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, reviewed Saba Transcripts for all inspectors and found information was correct.

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|----------|-----------------------------------------------------------------------------------------------------------------------------------|---|---|
| 8 | Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Information was found correct. However, civil penalty amount is below the \$100,000 to \$1 million requested by PHMSA

State Programs. The State of Mississippi civil penalty level is at least \$1,000 for each violation not to exceed \$200,000. This item was discussed with Rickey Cotton and Katherine Collier Executive Director during the program evaluation exit interview.

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

Evaluator Notes:

Yes, planned performance goals and accomplishments have been completed for the year in review. Information on the 9 elements of an effective damage prevention program were listed.

- 10** General Comments: Info OnlyInfo Only
Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section of the review.

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



PART B - Program Inspection Procedures

Points(MAX) Score

- | | | | |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 1 | Standard Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 2 | 1 |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

A review of the recently updated Mississippi Public Service Commission, Pipeline Safety Division Operation and Enforcement Procedures dated May 15, 2017 found a narrative or written description of action the inspector(s) need to take pertaining to pre-inspection and post-inspection was not provided. The existing procedures located on page 5 are weak and not enough detail is provided to the inspector or reader about what items need to be reviewed and checked before and after the inspection. The document contains a copy and paste of the suggested items listed in the 2017 Guidelines For States Participating in the Pipeline Safety Program. Improvement is needed and a loss of 1 point occurred.

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|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|-----|
| 2 | IMP and DIMP Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 0.5 |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|-----|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A review of the recently updated Mississippi Public Service Commission, Pipeline Safety Division Operation and Enforcement Procedures dated May 15, 2017 found a narrative or written description of action the inspector(s) need to take pertaining to pre-inspection and post-inspection of IMP and DIMP was not provided. The existing procedures located on page 9 are weak and not enough detail is provided to the inspector or reader about what items need to be reviewed and checked before and after the inspection. Improvement is needed and a loss of 0.5 point occurred.

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| 3 | OQ Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 0.5 |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|-----|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A review of the recently updated Mississippi Public Service Commission, Pipeline Safety Division Operation and Enforcement Procedures dated May 15, 2017 found a narrative or written description of action the inspector(s) need to take pertaining to pre-inspection and post-inspection was not provided. The existing procedures located on page 10 are weak and not enough detail is provided to the inspector or reader about what items need to be reviewed and checked before and after the inspection. Improvement is needed and a loss of 0.5 point occurred.

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| 4 | Damage Prevention Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 0.5 |
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A review of the recently updated Mississippi Public Service Commission, Pipeline Safety Division Operation and Enforcement Procedures dated May 15, 2017 found a narrative or written description of action the inspector(s) need to take pertaining to pre-inspection and post-inspection was not provided. The existing procedures located on page 10 are weak and not enough detail is provided to the inspector or reader about what items need to be reviewed and checked before and after the inspection. Improvement is needed and a loss of 0.5 point occurred.

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|---|--------------------------------------------------------------------------------------------|---|---|
| 5 | Any operator training conducted should be outlined and appropriately documented as needed. | 1 | 1 |
|---|--------------------------------------------------------------------------------------------|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A review of the recently updated Mississippi Public Service Commission, Pipeline Safety Division Operation and

Enforcement Procedures dated May 15, 2017 found this information located on page 9. On September 13-14, 2016 MPSC inspectors conducted a operator training course and 130 individuals attended the meeting.

- 6 Construction Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities.
- Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A review of the recently updated Mississippi Public Service Commission, Pipeline Safety Division Operation and Enforcement Procedures dated May 15, 2017 found a narrative or written description of action the inspector(s) need to take pertaining to pre-inspection and post-inspection was not provided. The existing procedures located on page 8 are weak and not enough detail is provided to the inspector or reader about what items need to be reviewed and checked before and after the inspection. Improvement is needed and a loss of 0.5 point occurred.

- 7 Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements?
- Yes = 6 No = 0 Needs Improvement = 1-5
- | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|--------------------------|-----------------------------------------|
| a. Length of time since last inspection (Within five year interval) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. Type of activity being undertaken by operators (i.e. construction) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| 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) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f. Are inspection units broken down appropriately? | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

A review of the recently updated Mississippi Public Service Commission, Pipeline Safety Division Operation and Enforcement Procedures dated May 15, 2017 found items "a through e" listed and located on page 6. Reviewed inspection units and found them to be broken down correctly. No areas of concern were found

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

Evaluator Notes:

Loss of points occurred pertaining to Questions B.1, B.2, B.3, B.4 & B.6.

Total points scored for this section: 10
Total possible points for this section: 13

PART C - Program Performance

Points(MAX) Score

- 1 Was ratio of Total Inspection person-days to total person days acceptable? (Director of State Programs may modify with just cause) Chapter 4.3 5 5
Yes = 5 No = 0
- A. Total Inspection Person Days (Attachment 2):
712.00
- B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 6.92 = 1521.67
- Ratio: A / B
712.00 / 1521.67 = 0.47
- If Ratio \geq 0.38 Then Points = 5, If Ratio $<$ 0.38 Then Points = 0
Points = 5

Evaluator Notes:

A.Total Inspection Person Days (Attachment 2)= 712
B.Total Inspection Person Days Charged to the program(220*Number of Inspection person years(Attachment 7)=1521.6663
Formula:- Ratio = A/B = 712/1521.6663 = 0.47
Rule:- (If Ratio \geq .38 then points = 5 else Points = 0.)
Thus Points = 5

- 2 Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines Appendix C for requirements) Chapter 4.4 5 0
Yes = 5 No = 0 Needs Improvement = 1-4
- a. Completion of Required OQ Training before conducting inspection as lead? Yes ☒ No ☐ Needs Improvement ☐
- b. Completion of Required DIMP*/IMP Training before conducting inspection as lead? *Effective Evaluation CY2013 Yes ☒ No ☐ Needs Improvement ☐
- c. Root Cause Training by at least one inspector/program manager Yes ☒ No ☐ Needs Improvement ☐
- d. Note any outside training completed Yes ☒ No ☐ Needs Improvement ☐
- e. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector. Yes ☐ No ☒ Needs Improvement ☐

Evaluator Notes:

A review of TQ transcripts found Lewis Davis has not completed all required courses within five years to meet the Gas Inspector Training Qualifications. This finding was noted in CY2012 and in previous state program evaluations. Neill Wood has completed the Root Cause course and is the only qualified lead inspector for DIMP/IMP. A loss of five points occurred due to one inspector not completing all required courses within 5 years of attending the first course.

- 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 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, Mr. Cotton has worked in the natural gas industry for 11 years, knowledgeable of pipeline safety technology, enforcement application and administrative procedures pertaining to PHMSA program requirements and certification. He has been the Program Manager for 3 years.

- 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 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, Chairman Presley response letter to Zach Barrett was received on October 31, 2016 and within the required 60 day time period.

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| 5 | Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5
Yes = 1 No = 0 | 1 | 1 |
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Evaluator Notes:

Yes, MPSC conducted a pipeline safety training session on September 13-14, 2016 in Jackson, MS. Over 130 individuals representing the distribution, transmission and master meter operators were in attendance.

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|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 6 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

Yes, conducted a review of MS Pipeline Safety Data base spreadsheet looking back over the last 5 years and found inspections were scheduled in accordance to established time intervals listed in MS PSC Procedures Manual.

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

Evaluator Notes:

Yes, MS PSC inspectors are using the federal forms to perform inspections. A review of inspection reports conducted in CY2016 found they were completed in all portions of the inspection form.

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| 8 | 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) Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

Yes, this is reviewed and checked using the federal inspection form. Only three distribution systems in MS have cast iron pipelines. Each of these systems have a replacement plan and anticipate all cast iron to be removed by CY2022.

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| 9 | 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) Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

Yes, this is reviewed and checked during the standard inspection.

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|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 10 | 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) Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

Yes, checked and reviewed with the operator during the standard inspection.

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|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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 192.617? Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

Yes, this is reviewed with the operator during the standard inspection.

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| 12 | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues? | 2 | 2 |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, the Program Manager and Administrative Assistant review the Operator Annual Reports as they are filed with the agency for leakage and trends. The information is provided to the inspectors who will review the document with the operator during the inspection.

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| 13 | Did state input all applicable OQ, DIMP/IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. | 2 | 2 |
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Chapter 5.1

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, a review of PHMSA OQ/DIMP database on May 18, 2017 found operator qualification inspections conducted in CY2016 were uploaded in a timely schedule.

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

Evaluator Notes:

Yes, this is confirmed by the inspectors during the standard inspection visit.

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| 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 | 2 | 2 |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, a review of files found thirty drug and alcohol inspections were conducted in CY2016. A review of inspection reports confirm the drug and alcohol tests were performed by the operator and verification of the positive test in accordance with 49 CFR 199.

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| 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 192 Part N | 2 | 2 |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes.

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|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 17 | Is state verifying operator's gas transmission integrity management programs (IMP) are up to date? This should include a previous review of IMP 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). (Are the State's largest operators programs being contacted or reviewed annually?). 49 CFR 192 Subpart 0 | 2 | 2 |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, this is reviewed and checked during the inspection.

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|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 18 | Is state verifying operator's gas distribution integrity management Programs (DIMP)? This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). (Are the State's largest operators programs being contacted or reviewed annually?). 49 CFR 192 Subpart P DIMP ? First round of program inspections should have been complete by December 2014 | 2 | 2 |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, a review of inspection reports confirm MS PSC reviewed the operator's plans along with the updates. Additionally, the Program Manager, Utility Staff and consultant staff members annually review Atmos Energy Company's Plan.

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| 19 | 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. PAPEI Effectiveness Inspections should have been completed by December 2013. PAPEI Effectiveness Inspections should be conducted every four years by operators. 49 CFR 192.616
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

Yes, PAPEI inspections were completed in the last quarter of CY2014. Inspectors are verifying the operators programs and checking to see if they are up to date during all inspections.

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| 20 | 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).
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, MS PSC continues to use their website as a mechanism to communicate about their pipeline safety program and seminar.

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| 21 | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------|---|----|
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Evaluator Notes:

NA. No Safety Related Condition Reports in CY2016.

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| 22 | 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?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
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Evaluator Notes:

Yes.

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| 23 | Did the state participate in/respond to surveys or information requests from NAPSRS or PHMSA?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, Robert Clarillos, NAPSRS Administrative Manager, confirmed Rickey Cotton has responded to 12 different surveys in CY2016.

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|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|
| 24 | 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.
No = 0 Needs Improvement = .5 Yes = 1 | 1 | NA |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|
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Evaluator Notes:

N/A

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|-----------|-------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 25 | Did the state attend the National NAPSRS Board of Directors Meeting in CY being evaluated?
No = 0 Needs Improvement = .5 Yes = 1 | 1 | 1 |
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Evaluator Notes:

Yes, Rickey Cotton and John Thompson attended the 2016 NAPSRS Board of Director's Meeting in Indianapolis, IN.

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|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 26 | Discussion on State Program Performance Metrics found on Stakeholder Communication site - http://primis.phmsa.dot.gov/comm/states.htm
No = 0 Needs Improvement = 1 Yes = 2 | 2 | 2 |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
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- a. Discussion of Potential Accelerated Actions (AA's) based on any negative trends Yes ☒ No ☐ Needs Improvement ☐
- b. NTSB P-11-20 Meaningful Metrics Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

Reviewed the PHMSA State Program Performance Metrics with Program Manager. The number of Excavation damages per 1,000 tickets for natural gas distribution system is trending down but all data has not been posted on the website. A review of other charts found a high increase in the number of leaks repaired per 1,000 miles of distribution system. Program Manager will continue to review the metrics and consider using the data in rank risking inspections of distribution system in their pipeline safety program for CY2017-CY2018.

- 27 Discussion with State on accuracy of inspection day information submitted into State Info Only Info Only
Inspection Day Calculation Tool. (No points)
Info Only = No Points

Evaluator Notes:

Reviewed the State Inspection Day Calculation Tool with Program Manager. It was agreed the existing CY2017 Inspection Person-Day number of 1117 was too high and needed to be lowered. Program Manager will adjust the number to 870 Inspection Person-Days which is similar to the number of inspections being performed by the current 9 inspectors.

- 28 Did the State verify Operators took appropriate action regarding Pipeline Flow Reversals, Info Only Info Only
Product Changes and Conversions to Service? See ADP-2014-04 (No Points)
Info Only = No Points

Evaluator Notes:

Program Manager is aware of the advisory bulletin and no issues pertaining to flow reversals and product changes have occurred on any of the intrastate transmission lines located in MS.

- 29 General Comments: Info Only Info Only
Info Only = No Points

Evaluator Notes:

A loss of five points occurred on Question C.2 of this section of the review. One inspector has not completing all required courses within 5 years of attending the first course.

Total points scored for this section: 42
Total possible points for this section: 47



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
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| a. | Procedures to notify an operator (company officer) when a noncompliance is identified | Yes <input checked="" type="radio"/> No <input type="radio"/> Needs Improvement <input type="radio"/> | |
| b. | Procedures to routinely review progress of compliance actions to prevent delays or breakdowns | Yes <input checked="" type="radio"/> No <input type="radio"/> Needs Improvement <input type="radio"/> | |
| c. | Procedures regarding closing outstanding probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> Needs Improvement <input type="radio"/> | |

Evaluator Notes:

- a. A review of the recently updated Mississippi Public Service Commission, Pipeline Safety Division Operation and Enforcement Procedures dated May 15, 2017 found written procedures to notify the company officer when noncompliance was issued is located on page 11.
- b. Written procedures in reviewing compliance actions was included in Section 6 on page 11.
- c. Written procedures regarding closure of an outstanding violation was located in Section 7, page 11.

- | | | | |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|----------|
| 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
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| a. | Were compliance actions sent to company officer or manager/board member if municipal/government system? | Yes <input checked="" type="radio"/> No <input type="radio"/> Needs Improvement <input type="radio"/> | |
| b. | Document probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> Needs Improvement <input type="radio"/> | |
| c. | Resolve probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> Needs Improvement <input type="radio"/> | |
| d. | Routinely review progress of probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> Needs Improvement <input type="radio"/> | |
| e. | Were applicable civil penalties outlined in correspondence with operator(s) | Yes <input checked="" type="radio"/> No <input type="radio"/> Needs Improvement <input type="radio"/> | |

Evaluator Notes:

- a. A review of inspection reports located in file folders found correspondence to company officers or managers were provided in letters to operators.
- b. Yes, reviewed MS PSC spreadsheet and found probable violations are listed.
- c. Probable violations are resolved and listed in the written procedures.
- d. Program Manager and Administrative Assistant review probable violations weekly. Additionally, a Monthly report is provided to the Commissioners on the status of the violations in their regions of the State.
- e. Yes, a review of correspondence letters show civil penalty amounts are listed in the letters to the operator about violations.

- | | | | |
|----------|------------------------------------------------------------------------------------------------------------------------|----------|----------|
| 3 | Did the state issue compliance actions for all probable violations discovered?
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|------------------------------------------------------------------------------------------------------------------------|----------|----------|

Evaluator Notes:

Yes, eight-five compliance actions were taken against operators in CY2016.

- | | | | |
|----------|-----------------------------------------------------------------------------------------------------------------------------------|----------|----------|
| 4 | Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary.
Yes = 2 No = 0 | 2 | 2 |
|----------|-----------------------------------------------------------------------------------------------------------------------------------|----------|----------|

Evaluator Notes:

Yes, information on due process is described in MS PSC Pipeline Safety Procedures and letter to the operator.

- | | | | |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|----------|
| 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)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|----------|

Evaluator Notes:

Yes, Program Manager is familiar with imposing civil penalties.

- 6 Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations? 1 0
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No. MS PSC continues to be unable to demonstrate they have used their enforcement fining authority for pipeline safety violations in the last seven years. This item and loss of points was mentioned previously in the Chairman's letter pertaining to the State Program Evaluation letters. This item was also discussed with at the exit interview with the Executive Director and Program Manger. A loss of one point occurred.

7 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

A loss of one point occurred in this section of review. See question D.6

Total points scored for this section: 14
Total possible points for this section: 15



PART E - Incident Investigations

Points(MAX) Score

- 1 Does the state have written procedures to address state actions in the event of an incident/accident? 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

A review of the recently updated Mississippi Public Service Commission, Pipeline Safety Division Operation and Enforcement Procedures dated May 15, 2017 found this information listed in Section 6, page 19.

- 2 Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? And did state keep adequate records of Incident/Accident notifications received? Chapter 6 2 2

Yes = 2 No = 0 Needs Improvement = 1

- 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:

A review of the recently updated Mississippi Public Service Commission, Pipeline Safety Division Operation and Enforcement Procedures dated May 15, 2017 found this information in Section 6, pages 21 & 22.

- 3 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 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A review of the recently updated Mississippi Public Service Commission, Pipeline Safety Division Operation and Enforcement Procedures dated May 15, 2017 found in Section 6.3, page 22.

- 4 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? 3 NA

Yes = 3 No = 0 Needs Improvement = 1-2

- a. Observations and document review Yes ☒ No ☐ Needs Improvement ☐
- b. Contributing Factors Yes ☒ No ☐ Needs Improvement ☐
- c. Recommendations to prevent recurrences when appropriate Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

NA. No reportable incidents occurred in CY2016.

- 5 Did the state initiate compliance action for violations found during any incident/accident investigation? 1 NA

Yes = 1 No = 0

Evaluator Notes:

NA. No reportable incidents occurred in CY2016.

- 6 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 report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 1 NA

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No reportable incidents occurred in CY2016.

- 7 Does state share lessons learned from incidents/accidents? (sharing information, such as: at NAPS Region meetings, state seminars, etc) 1 1

Yes = 1 No = 0

Evaluator Notes:

Yes, information about potential response to incidents/accidents was explained to the NAPS SR members at the recently NAPS SR Southern Region meeting in Savannah, GA.

8 General Comments:

Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

No loss of points occurred in this section of the review.

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



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? NTSB
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

Yes, this is reviewed and discussed with the operator during the standard or construction inspection.

- | | | | |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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?
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

Yes, this is checked by the inspector during the standard inspection audit. During a construction inspection, the inspector reviews the locate ticket and marking of the facilities.

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

Evaluator Notes:

Yes, they continue to promote CGA Best Practices with operators at their seminars, inspection visits and meetings.

- | | | | |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

Yes, Program Manager continues to collect and review trends in the number of pipeline damages per 1,000 locate requests via annual reports filed by the operator. This information is also used in risk ranking the operators to be inspected. Inspectors continue to encourage operators to use and upload all damages into the DIRT program.

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

Evaluator Notes:

No loss of points occurred in this section of the review.

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 Info Only
Info Only = No Points

Name of Operator Inspected:

Laurel Fuel Company

Name of State Inspector(s) Observed:

Joe Porter, Pipeline Safety Investigator

Location of Inspection:

Jackson, MS

Date of Inspection:

May 25, 2017

Name of PHMSA Representative:

Glynn Blanton, PHMSA State Evaluator

Evaluator Notes:

This was a transmission line standard inspection performed in Jackson, MS. The field portion of the inspection was scheduled for June 13, 2017 in Laurel, MS. The individuals present during this inspection are as follows: Mike Fortenberry, V-Pres. Laurel Fuel Company, Cindy Touchstone, Laurel Fuel Company, Annie McIlwain, Earth Company Consultant, Rickey Cotton, MSPSC and Neill Wood, MSPSC Pipeline Safety Investigator

- 2 Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? 1 1
Yes = 1 No = 0

Evaluator Notes:

Yes, Mike Fortenberry, V-Pres. of Laurel Fuel Company was contacted by Joe Porter on May 9, 2017.

- 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) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, it was observed Joe Porter was using the federal standard inspection form to conduct the inspection of the operator's records and procedure manual.

- 4 Did the inspector thoroughly document results of the inspection? 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, Joe Porter was writing responses from the operator and consultant representative on the questions asked about their operation and maintenance plan.

- 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.) 1 1
Yes = 1 No = 0

Evaluator Notes:

Yes, Joe Porter checked the operator's drawings, maps and records pertaining to the operation of the system. No areas of concern were noted or found.

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

a. Procedures ☒

b. Records ☒

c. Field Activities ☐

d. Other (please comment) ☐

Evaluator Notes:

It was observed by this writer, Joe Porter reviewing the operations and maintenance procedures and checking records pertaining to the date cathodic protection of valve maintenance was performed.

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

Evaluator Notes:

Yes, Joe Porter has completed two of the seven required courses at TQ and has over 15 years of experience in pipeline construction installation and maintenance.

- | | | | |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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)
Yes = 1 No = 0 | 1 | 1 |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

Yes, a partial exit interview was conducted with the operator and consultant representatives. Several errors in the operations and maintenance manual need to be corrected by the operator. The field portion of the inspection was scheduled for June 13th and as required my MS PSC procedures an exit interview will be conducted.

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

Evaluator Notes:

Yes, several minor errors were identified in the operator's procedure manual that will need to be corrected. At the exit interview, Joe Porter did not identify probable violations.

- | | | | |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|
| 10 | General Comments: 1) What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) 2) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) 3) Other.
Info Only = No Points | Info Only | Info Only |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|

- | | | | |
|----|-------------------------------|-------------------------------------|--|
| a. | Abandonment | <input type="checkbox"/> | |
| b. | Abnormal Operations | <input type="checkbox"/> | |
| c. | Break-Out Tanks | <input type="checkbox"/> | |
| d. | Compressor or Pump Stations | <input type="checkbox"/> | |
| e. | Change in Class Location | <input checked="" type="checkbox"/> | |
| f. | Casings | <input type="checkbox"/> | |
| g. | Cathodic Protection | <input checked="" type="checkbox"/> | |
| h. | Cast-iron Replacement | <input type="checkbox"/> | |
| i. | Damage Prevention | <input checked="" type="checkbox"/> | |
| j. | Deactivation | <input type="checkbox"/> | |
| k. | Emergency Procedures | <input checked="" type="checkbox"/> | |
| l. | Inspection of Right-of-Way | <input type="checkbox"/> | |
| m. | Line Markers | <input checked="" type="checkbox"/> | |
| n. | Liaison with Public Officials | <input type="checkbox"/> | |
| o. | Leak Surveys | <input type="checkbox"/> | |
| p. | MOP | <input type="checkbox"/> | |
| q. | MAOP | <input type="checkbox"/> | |
| r. | Moving Pipe | <input type="checkbox"/> | |
| s. | New Construction | <input type="checkbox"/> | |
| t. | Navigable Waterway Crossings | <input type="checkbox"/> | |
| u. | Odorization | <input type="checkbox"/> | |
| v. | Overpressure Safety Devices | <input type="checkbox"/> | |
| w. | Plastic Pipe Installation | <input type="checkbox"/> | |
| x. | Public Education | <input type="checkbox"/> | |
| y. | Purging | <input type="checkbox"/> | |

- | | | |
|----|-----------------------------------|--------------------------|
| z. | Prevention of Accidental Ignition | <input type="checkbox"/> |
| A. | Repairs | <input type="checkbox"/> |
| B. | Signs | <input type="checkbox"/> |
| C. | Tapping | <input type="checkbox"/> |
| D. | Valve Maintenance | <input type="checkbox"/> |
| E. | Vault Maintenance | <input type="checkbox"/> |
| F. | Welding | <input type="checkbox"/> |
| G. | OQ - Operator Qualification | <input type="checkbox"/> |
| H. | Compliance Follow-up | <input type="checkbox"/> |
| I. | Atmospheric Corrosion | <input type="checkbox"/> |
| J. | Other | <input type="checkbox"/> |

Evaluator Notes:

Joe Porter reviewed maps and records of the transmission line right of way, pressure testing, regulator station locations and procedures manual. A discussion on odorization of the pipeline in a class 1 location at the take point of injection into the system was reviewed. It appears odorization is being conducted correctly.

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

Evaluator Notes:

N/A

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

Evaluator Notes:

N/A

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

Evaluator Notes:

N/A

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

Evaluator Notes:

N/A

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

Evaluator Notes:

N/A

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

Evaluator Notes:

N/A

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

Evaluator Notes:

N/A

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

Evaluator Notes:

N/A

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

PART I - 60106 Agreement State (If Applicable)**Points(MAX) Score**

- | | | | |
|----------|----------------------------------------------------------------------------------------------------|---|----|
| 1 | Did the state use the current federal inspection form(s)?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|----------------------------------------------------------------------------------------------------|---|----|

Evaluator Notes:

N/A

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

Evaluator Notes:

N/A

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

Evaluator Notes:

N/A

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

Evaluator Notes:

N/A

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

Evaluator Notes:

N/A

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

Evaluator Notes:

N/A

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

Evaluator Notes:

N/A

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