



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

1200 New Jersey Avenue SE
Washington DC 20590

2009 Hazardous Liquid State Program Evaluation

for

VIRGINIA STATE CORPORATION COMMISSION

Document Legend

PART:

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



2009 Hazardous Liquid State Program Evaluation -- CY 2009
Hazardous Liquid

State Agency: Virginia

Agency Status:

Date of Visit: 04/27/2010 - 04/29/2010

Agency Representative: Massoud Tahamtani and Jim Hotinger

PHMSA Representative: Jim Anderson

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

Name/Title: James C. Dimitri, Chair

Agency: Virginia State Corporation Commission

Address: 1300 East Main Street, Tyler Building

City/State/Zip: Richmond, Virginia 23219

Rating:

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

INSTRUCTIONS:

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

Field Inspection (PART F):

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

Scoring Summary

PARTS

Possible Points Points Scored

| | | | |
|---|---|-----|-----|
| A | General Program Qualifications | 26 | 23 |
| B | Inspections and Compliance - Procedures/Records/Performance | 31 | 31 |
| C | Interstate Agent States | 6 | 6 |
| D | Accident Investigations | 1.5 | 1.5 |
| E | Damage Prevention Initiatives | 9 | 9 |
| F | Field Inspection | 12 | 12 |
| G | PHMSA Initiatives - Strategic Plan | 10 | 10 |
| H | Miscellaneous | 3 | 3 |
| I | Program Initiatives | 9 | 9 |

107.5 104.5

TOTALS

State Rating

97.2

PART A - General Program Qualifications

Points(MAX) Score

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

SLR Notes:

Attachment 1 and 3 totals match

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

SLR Notes:

Appendix 6 of Inspection Procedures and information in Operators emergency manuals.

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

SLR Notes:

SCC hosted TQ seminar 9/29/30-10/1/2009

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

SLR Notes:

Files and reports are kept on file and electronically.

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

SLR Notes:

Both Massoud Tahamtani and Jim Hotinger are knowledgeable in pipeline safety regulations and national and regional issues.

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

SLR Notes:

SLR Notes:

Yes- received letters in December 2009 and responded in January 2010. Was given a copy of written response.

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

SLR Notes:

Yes

Personnel and Qualifications

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

SLR Notes:

H.P. Sadler has been listed for three consecutive years as 100% full time hazardous liquid inspector. Mr. Sadler has not successfully completed all require training classes in the three year time frame.

-
- 9 Brief Description of Non-T&Q training Activities Info Only Info Only

Info Only = No Points

For State Personnel:

For Operators:

For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:

SLR Notes:

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

SLR Notes:

CBT training and TQ OQ courses have been completed.

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

SLR Notes:

Yes

-
- 12 Was the ratio acceptable of Total inspection Person-days to Total Person-days charged to the program by state inspectors? (Region Director may modify points for just cause) (Chapter 4.3) Previous Question B.14 5 5
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):

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

Ratio: A / B

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

SLR Notes:

Total inspection person days (Attachment 2 is 147 - 151-4 damage prevention days) Ratio $147/220 \times .74 = 147/162 = .90$.
Ratio exceeds .38

13

Have there been modifications or proposed changes to inspector-staffing levels? (If yes, describe)

Previous

Info Only

Info Only

Question B.13

Info Only = No Points

SLR Notes:

14

Part-A General Comments/Regional Observations

Info Only

Info Only

Info Only = No Points

SLR Notes:

Total points scored for this section: 23

Total possible points for this section: 26



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

Points(MAX) Score

Inspection Procedures

- 1** Does the State have a written inspection plan to complete the following? (all types of operators) (Chapter 5.1) Previous Question B.1 + Chapter 5 Changes
Yes = 6.5 No = 0 Needs Improvement = 50% Deduction
- | | | | | |
|---|---|--------------------------------------|--------------------------|---|
| a | Standard Inspections (Including LNG) (Max points = 2) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b | IMP Inspections (Including DIMP) (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c | OQ Inspections (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d | Damage Prevention (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e | On-Site Operator Training (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f | Construction Inspections (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| g | Incident/Accident Investigations (Max points = 1) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| h | Compliance Follow-up (Max points = 1) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

SLR Notes:

SCC has written inspection procedures and all listed inspections are addressed.

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

SLR Notes:

All issues are addressed in inspection procedures.

Inspection Performance

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

SLR Notes:

Yes

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

SLR Notes:

Yes

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

SLR Notes:

Yes

- 6** Did the state initiate appropriate follow-up actions to Safety Related Condition Reports? (Chapter 6.3) Previous Question B.7
Yes = .5 No = 0

SLR Notes:

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

SLR Notes:

Yes - SCC performed inspections, including cathodic protection inspections, on all operators and inspection units.

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

SLR Notes:

Yes

| | | | |
|----------|--|----|-----|
| 9 | Is the state aware of environmentally sensitive areas traversed by or adjacent to hazardous liquid pipelines? (reference Part 195, review of NPMS) Previous Question B.16 Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

SCC covered these items as part of their inspections.

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

SLR Notes:

Yes

Compliance - 60105(a) States

| | | | |
|-----------|--|---|---|
| 11 | Did the state adequately document sufficient information on probable violations? (Chapter 5.2) Previous Question B.13 Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

SLR Notes:

2 NOPVs submitted to Eastern Region for further action.

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

SLR Notes:

Yes

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

SLR Notes:

Yes

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

SLR Notes:

Yes

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

SLR Notes:

Yes

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

SLR Notes:

Yes

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

SLR Notes:

Yes

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

SLR Notes:

Yes

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

SLR Notes:

Yes - highest ranking in state official.

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

SLR Notes:

Yes

Compliance - 60106(a) States

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

SLR Notes:

Yes

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

SLR Notes:

Yes

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

SLR Notes:

2 NOPVs submitted to Eastern Region for further action.

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

SLR Notes:

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

SLR Notes:

Yes

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

SLR Notes:

Yes

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

SLR Notes:

Total points scored for this section: 31
Total possible points for this section: 31



PART C - Interstate Agent States

Points(MAX) Score

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

SLR Notes:

Yes

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

SLR Notes:

Yes

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

SLR Notes:

Yes

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

SLR Notes:

Yes

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

SLR Notes:

None in state in 2009

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

SLR Notes:

Yes

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

SLR Notes:

Yes

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

SLR Notes:

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

PART D - Accident Investigations

Points(MAX) Score

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

SLR Notes:

Yes

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

SLR Notes:

Yes

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

SLR Notes:

No accidents reported in 2009.

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

SLR Notes:

No accidents in 2009.

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

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

SLR Notes:

No accidents in 2009.

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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



PART E - Damage Prevention Initiatives

Points(MAX) Score

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

SLR Notes:

SCC has directional drilling procedures in their damage prevention law.
(20 VAC 5-309-150)

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

SLR Notes:

Yes - Utility locate tickets and positive response is required by law.

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

SLR Notes:

Yes - Adopted CGA's Best Practices not already in the Damage Prevention law and Call Center also adopted CGA Best Practices.

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

SLR Notes:

Agency does this to track trends.

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

SLR Notes:

SCC requires all damages reported to SCC and SCC investigates each report. An advisory council reviews each incident for proper penalty.

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

SLR Notes:

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

PART F - Field Inspection

Points(MAX) Score

1 Operator, Inspector, Location, Date and PHMSA Representative Info Only Info Only
Info Only = No Points

Name of Operator Inspected:

Plantation Pipeline Company

Name of State Inspector(s) Observed:

James B. Fisher

Location of Inspection:

Stafford, Virginia

Date of Inspection:

5/11/2010

Name of PHMSA Representative:

Dale Bennett

SLR Notes:

5/11/2010 - James Fisher

Inspected a river crossing installed by Plantation Pipeline Company and James is a very knowledgeable liquid inspector.

2 Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? New 2008 1 1
Yes = 1 No = 0

SLR Notes:

Jim notified the operator on 5/6/2010, and was on site.

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

SLR Notes:

Jim used the Virginia Liquid Transmission Construction Checklist.

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

SLR Notes:

Jim documented the results of the inspection on the checklist.

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

SLR Notes:

Jim checked all the operators equipment during his inspection.

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

SLR Notes:

Construction

7 Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) New 2008, comprehensive question worth 2 points total 2 2
Yes = 2 No = 0 Needs Improvement = 1

a. Procedures ☒

b. Records ☐

c. Field Activities/Facilities ☒

d. Other (Please Comment)

☐

SLR Notes:

The operator was making a river bore on the James river.

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

2

2

SLR Notes:

It was definitely not Jim's first river bore he has inspected.

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

1

1

SLR Notes:

Jim went over all the details with the operator.

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

1

1

SLR Notes:

Jim noted no probable violations.

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

Info Only

Info Only

SLR Notes:

Jim observed a 24" coated steel pipe being bored across the James river in Stafford, Virginia. He observed all equipment used and paid close attention to the coating once it was pulled.

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

Info Only

Info Only

SLR Notes:

None

- 13** Field Observation Areas Observed (check all that apply)
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 | <input type="checkbox"/> |
| r. | Moving Pipe | <input type="checkbox"/> |
| s. | New Construction | <input checked="" type="checkbox"/> |
| t. | Navigable Waterway Crossings | <input checked="" type="checkbox"/> |
| u. | Odorization | <input type="checkbox"/> |
| v. | Overpressure Safety Devices | <input 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"/> |

SLR Notes:

None

14 Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

Jim is very knowledgeable liquid inspector.

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



PART G - PHMSA Initiatives - Strategic Plan

Points(MAX) Score

Risk base Inspections - Targeting High Risk Areas

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

Yes = 1.5 No = 0

Risk Factors (criteria) to consider may include:

Miles of HCA's, Geographic area, Population Density

Length of time since last inspection

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

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

SLR Notes:

Yes - in Section IV of Inspection Procedures.

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

Yes = .5 No = 0

SLR Notes:

Yes

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

Yes = .5 No = 0

SLR Notes:

Yes

Use of Data to Help Drive Program Priority and Inspections

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

Yes = .5 No = 0

SLR Notes:

Yes - this is incorporated in the SCC PIPES program.

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

Yes = .5 No = 0

SLR Notes:

Yes

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

Yes = .5 No = 0

SLR Notes:

Yes - this is incorporated in the SCC PIPES program.

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

Yes = .5 No = 0

SLR Notes:

Yes - in the PIPES program

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

Yes = .5 No = 0

SLR Notes:

Yes

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

SLR Notes:

Yes - reviewed OQDB webpage.

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

SLR Notes:

Yes

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

SLR Notes:

Yes

- 12** Did the State use the Federal Protocols to conduct IMP Inspections? (If the State used an alternative inspection form(s) please provide information regarding alternative form(s)) Previous Question C(2).6 .5 0.5
Yes = .5 No = 0

SLR Notes:

Yes

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

SLR Notes:

Yes - Checked NPMS to verify operators on system.

Accident/Incident Investigation Learning and Sharing Lessons Learned

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

SLR Notes:

Yes - Damage Prevention meetings and Pipeline Safety seminars.

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

SLR Notes:

Yes

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

Scheduled for training in February 2010.

Transparency - Communication with Stakeholders

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

SLR Notes:

Damage Prevention meetings, Emergency Planning councils, Advisory Bulletins

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

SLR Notes:

Docket access on SCC webpage

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

SLR Notes:

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



PART H - Miscellaneous

Points(MAX) Score

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

SLR Notes:

Damage prevention project with PHMSA and operators.

- | | | | |
|----------|---|----|-----|
| 2 | What legislative or program initiatives are taking place/planned in the state, past, present, and future? (Describe initiatives (i.e. damage prevention, jurisdiction/authority, compliance/administrative, etc.) A.16 Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Passed sewer lateral marking in last years legislation.

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

SLR Notes:

Operators revise O&M manuals.

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

SLR Notes:

October 2009.

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

SLR Notes:

At NAPS Eastern Region meeting.

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

SLR Notes:

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

PART I - Program Initiatives

Points(MAX) Score

Drug and Alcohol Testing (49 CFR Part 199)

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

SLR Notes:

Yes - inspection performed.

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

SLR Notes:

Yes - through inspections.

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

SLR Notes:

Yes- Interstate operator had 3 random positive test, none in VA

Qualification of Pipeline Personnel (49 CFR Part 192 Subpart N)

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

SLR Notes:

Yes - SCC has copy of operators OQ manuals.

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

SLR Notes:

Yes

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

SLR Notes:

Yes - used Protocol 9.

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

SLR Notes:

ID cards to verify training on covered task.

Hazardous Liquid Pipeline Integrity Management (49 CFR Part 195.452)

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

SLR Notes:

Yes

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

SLR Notes:

Yes

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

SLR Notes:

Yes

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

SLR Notes:

Yes

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

SLR Notes:

Yes

Public Awareness (49 CFR Section 195.440)

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

SLR Notes:

Yes - 2009 Plantation Pipeline, Colonial, and Atmos.

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

SLR Notes:

Yes

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

SLR Notes:

Yes

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

SLR Notes:

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

SLR Notes:

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