



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

1200 New Jersey Avenue SE
Washington DC 20590

2017 Hazardous Liquid State Program Evaluation

for

RAILROAD COMMISSION OF TEXAS

Document Legend

PART:

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



2017 Hazardous Liquid State Program Evaluation -- CY 2017
Hazardous Liquid

State Agency: Texas

Agency Status:

Date of Visit: 07/23/2018 - 08/17/2018

Agency Representative: Stephanie Weidman

PHMSA Representative: Michael Thompson

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

Name/Title: Christi Craddick, Chairman

Agency: Railroad Commission of Texas

Address: P.O. Box 12967

City/State/Zip: Austin, Texas 78711-2967

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 2017 (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

Possible Points Points Scored

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

10
13
42
15
11
8
12
0
0

10
13
40
15
11
8
12
0
0

TOTALS

111 109

State Rating 98.2

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:

The Texas PES database tracks the number of operators and inspection unit data. Verified the number of operators and inspections in PES. No issues identified.

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

Evaluator Notes:

No issues identified

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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 |
|----------|--|---|---|

Evaluator Notes:

Reviewed the PES Database to verify the information in Attachment 3. Operator and Inspection units were accurate. No issues identified.

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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 |
|----------|--|---|---|

Evaluator Notes:

Reviewed incident reports and compared with PDM to assure all federally reportable incidents were investigated or reported to state. No issues identified.

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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:

Reviewed PES database to verify the number compliance actions reported in the Progress Report. The data seems to be accurate. There is a large number of probable violations being carried over from year to year due to the legal process. TX RRC is working on closing out the cases within a reasonable time.

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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 |
|----------|---|---|---|

Evaluator Notes:

Yes, all program files are kept electronically in PES. No issues identified.

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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 |
|----------|--|---|---|

Evaluator Notes:

Reviewed employee training in SABA and with the RRC Database and no issues identified with the list.

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

Evaluator Notes:

Texas has adopted all regulations and amendments within Parts, 195, 198 and 199

- 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, the TXRRC describe accomplishments on the progress report. Example;
In 2017, Pipeline Safety inspectors completed approximately 530 hazardous liquid safety evaluations of 175 operators, for which we sent 30 violation letters citing 151 alleged violations. Also during 2017, we reported 139 violations as corrected; this number includes violations that were cited in previous years. Also, the Commission collected a total of \$20,000.00 in enforcement penalties for hazardous liquid enforcement cases.

10 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

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



PART B - Program Inspection Procedures

Points(MAX) Score

- | | | | |
|---|--|---|---|
| 1 | Standard 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 | 2 |
|---|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. Standard Operating Procedure (SOG) 3: Routine Comprehensive Evaluation Procedures give guidance to the inspectors to perform standard inspections. Procedures include pre and post inspection procedures.

- | | | | |
|---|---|---|---|
| 2 | IMP 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 | 1 |
|---|---|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes. SOG 6.1 TIMP Procedures and SOG 6.2 DIMP Procedures give guidance to inspectors for performing IM inspections. Recommended to TX RRC that all inspectors have access to the PDM and utilize it to perform all pre inspection activities for all types of inspections. Also recommend to add additional language to SOG 6.2.2.1 for the use of Form 24 for DIMP for large operators. See 6.1.2.1 for http resources.

- | | | | |
|---|--|---|---|
| 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 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

. Yes. SOG 6.3 has OQ Inspection procedures which has details for performing OQ inspections. OQ inspections are proposed to be on a five-year inspection cycle.

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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 | 1 |
|---|---|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes. SOG 6.7 has details for Damage Prevention Inspections. Procedures give guidance to state inspectors that insure consistency in all inspections conducted by the state addressing pre-inspection activities, inspection activities, and post-inspection activities. Stephanie Weidman is Acting supervisor for Damage Prevention Section of RRC. Damage Prevention has 7 employees.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes. SOG Section 5 as Operator Training Procedures for performing operator training. Procedures had detail on how to perform and document operator training. Had a training session during their Pipeline Safety Seminar along with the Texas Gas Association.

- | | | | |
|---|--|---|---|
| 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. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes. SOG 6.6 New Construction Evaluation has procedure for conducting new construction inspections. TAX 8.115 is Texas law that requires operators to report any new construction 30 days prior to constructing more than 1 mile of pipe. Law is changing to 60 day notice and .1 miles of new pipe. The New Construction Lead Inspector must successfully complete required TQ courses prior to conducting any new construction inspections. This person should lead the evaluation with the assistance of other participating team members, if a team is utilized, and is to remain present during the duration of the evaluation. The change in the Law was delayed, but it is still scheduled to be changed

- | | | | |
|----|---|--------------------------------------|--|
| 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 | 6 | 6 |
| 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 area, 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:

- Yes. a. Inspection intervals are at 5 year intervals.
b. Operating history is included in their unit inspection risk ranking
c. Procedures include activities undertaken by operator.
d. HCA's and population are part of the unit risk ranking.
e. SOG 3 was amended last year to include the tracking of incidents and causes which include Excavation damage. corrosion, natural outside forces, material and welds, equipment, operators and other factors. f. Units are broken down mostly by operating area for Distribution and by mileage for Transmission. e. SOG 3 includes the tracking of incidents and causes which include Excavation damage. corrosion, natural outside forces, material and welds, equipment, operators and other factors.

8 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Total points scored for this section: 13
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):
1572.00
B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 8.82 = 1940.03
Ratio: A / B
1572.00 / 1940.03 = 0.81
If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0
Points = 5

Evaluator Notes:

Yes,

61 inspectors @8.78 Person Years
220 X 8.78 = 1931.6 1572/1931.6 = .81

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

Evaluator Notes:

a. The RRC has an in house training program for each new inspector. Each inspector goes through the training for at least 6 months. They accompany another seasoned inspector during the inspections to obtain on the job training. Joey Bass is the training coordinator who monitors each inspectors progress while they are in training. When the inspector is knowledgeable of the pipeline safety program he/she is checked out by an inspector and verified by the Program Manager. The inspectors also attend the required T&Q courses within 3 years. b. Reviewed IMP inspections and found that all lead inspectors were qualified. Checked qualifications with SABA database. c. There are several inspectors that have taken the Root Cause training course. d. The RRC has an in house training program which is very lengthy so outside training is not attended. Due to travel funds outside training is limited. e. The RRC has an in house training program for each new inspector. Each inspector goes through the training for atleast 6 months. They accompany another seasoned inspector during the inspections to obtain on the job training. Joey Bass is the training coordinator who monitors each inspectors progress while they are in training. When the inspector is knowledgeable of the pipeline safety program he/she is checked out by an inspector and verified by the Program Manager. The inspectors also attend the required T&Q courses within 3 years.

- 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. In reviewing Stephanie Weidman's training and discussions she is very knowledgeable of the PHMSA program and regulations.

- 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, the response was received within 60 days.

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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, the TXRRC held a safety Seminar on September 22, 2017. The seminar was conducted without PHMSA TQ participation.

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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 | 4 |
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Evaluator Notes:

The TX RRC is not complying with their procedures in inspecting units within the time intervals established. The main issue is the time intervals between specialized inspections (OQ, IMP). In reviewing the yearly work plan there are some operators that have not had a specialized inspection (OQ, IMP) within the five year interval. Example Inspection Packages; #115558-IMP, #116027-IMP, #116538-OQ, The TX RRC needs to improve on the inspection interval to meet their established intervals per their procedures. Loss of 1 point

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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 |
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Evaluator Notes:

Yes, the TX RRC uses the Federal Forms in an excel version. Reviewed inspection reports and found that all applicable portions of the inspection forms were filled out by the inspectors. No issues identified.

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| 8 | 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)?
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|
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Evaluator Notes:

SOG 8 has incident/accident procedures. Records of previous accidents are reviewed by the TX RRC to ensure appropriate operator response. Review during inspections to verify operator response.

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| 9 | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues?
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|
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Evaluator Notes:

SOG 3 has the procedure to review Annual reports and incidents. The Program Manager reviews the annual reports, incident reports along with PRIMIS and analyze data.

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| 10 | Has state confirmed intrastate operators have submitted information into NPMS database along with changes made after original submission?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Inspection form has question to ask during inspection which identified submittals to NPMS. Reviewed inspection reports to assure the question is being asked.

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| 11 | 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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|
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Evaluator Notes:

Yes. A drug and alcohol verification inspection is conducted on every inspection. The form is used to verify the operator's MIS information. Drug and Alcohol Program inspections are performed on every operator every 5 years. Procedures require the inspector to conduct a field Drug and Alcohol during every standard inspection.

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|----|---|---|---|
| 12 | Is state verifying operators OQ programs are up to date? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals determined in the operators plan. 49 CFR 195 Part G
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----|---|---|---|

Evaluator Notes:

In reviewing the inspection reports, the TX RRC is performing OQ inspections and verifying the OQ programs are up to date.

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|----|---|---|---|
| 13 | Is state verifying operator's hazardous liquid integrity management (L IMP) Programs are up to date? This should include a previous review of LIMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review should take in to account program review and updates of operators plan(s). (Are the State's largest operators programs being contacted or reviewed annually? Are replies to Operator IM notifications addressed? (formerly part of Question C-10)). 49 CFR 195.452 Appendix C
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 1 |
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Evaluator Notes:

Inspections completed use inspection forms that include a previous review of IMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review takes in to account program review and updates of operators plan (s) per 49 CFR 195.452 Subpart c. The individuals performing these inspections met PHMSA qualification requirements. Tx RRC is not meeting their 5 year re-inspection interval for all intrastate regulated Operator's IM Plans, which is noted on question C6. Loss of 1 point

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|----|---|---|---|
| 14 | 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 be conducted every four years by operators. 49 CFR 195.440
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

The TX RRC perform Public Awareness program inspections during their comprehensive inspections. There were many inspections reports reviewed which included the review of public awareness programs.

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|----|--|---|---|
| 15 | 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 |
|----|--|---|---|

Evaluator Notes:

RRC website has enforcement cases available to the public, provides operator resources such as guidelines for operating small distribution systems, has section for the TAC Code, section for any pipeline safety events coming up, and damage prevention section educating the public.

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|----|---|---|---|
| 16 | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

TX RRC executed appropriate follow-up actions to Safety Related Condition (SRC) Reports reviewed during evaluation.

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| 17 | Did the state participate in/respond to surveys or information requests from NAPS or PHMSA?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, Stephanie Weidman responded to NAPS surveys in 2017 which was verified thru email.

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|----|---|---|---|
| 18 | 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. | 1 | 1 |
|----|---|---|---|



Needs Improvement = .5 No = 0 Yes = 1

Evaluator Notes:

Stephanie Weidman, the program manager, has reviewed the status of all waivers granted in Texas and is now in the process of having the status of each up dated. She will be working with Kay MacGyver in PHMSA HQ. (Recommendation to be reviewed in 2019 evaluation)

19	Did the state attend the National NAPS Board of Directors Meeting in CY being evaluated?	1	1
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Needs Improvement = .5 No = 0 Yes = 1

Evaluator Notes:

Yes, Stephanie Weidman attended the National NAPS Board Meeting.

20	Discussion on State Program Performance Metrics found on Stakeholder Communication site ? http://primis.phmsa.dot.gov/comm/states.htm	2	2
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Needs Improvement = 1 No = 0 Yes = 2

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|----|---|--------------------------------------|--------------------------|---|
| a. | Discussion of Potential Accelerated Actions (AA's) based on any negative trends | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | NTSB P-11-20 Meaningful Metrics | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

? Excavation Damages per 1000 Locate Tickets has stayed about the same from 2014 to 2017 at a little over 3 per 1000 tickets. This is a significant drop from 2010 when the number was almost 5.

? Inspection days per 1000 miles of pipe have Dropped below 2014 and 2015 (25) levels to around 22 in 20156.

? Inspection days per MMO/LPG have gone up in 2016 from .70 to .80 and are higher than ever since 2010 when data started being tracked.

? Inspection days per 1000 miles of liquid pipelines have gone up to over 50 from around 42 in 2015. This is still a significant increase over any previous year recorded from 2010 ? 2013.

? Gas & Liquid Inspector qualification is down in the core training area but has gone up in the additional and 5-year retention area. Overall training suffers due to turn over of inspectors.

? Gas Distribution System Leaks per 1000 miles of pipe. Number of leaks repaired has gone up over the 2015 to 2016. Number of hazardous leaks repaired has stayed the same 2015 to 2016. Number of outstanding leaks has decreased a small amount over the same period.

? Enforcement Program Evaluation is steady for both gas and liquid pipelines at 100 percent.

? Incident investigations for both gas and hazardous liquids has gone up to 100% in 2016 from around 75% in 2015.

21	Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT) Has the State updated SICT data?	1	NA
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No = 0 Yes = 1

Evaluator Notes:

SICT days = 4297

2017 Progress Report = 1572

TXRRC needs to work to improve the accuracy of the number of days estimated in the SICT

22	Did the State verify Operators took appropriate action regarding Pipeline Flow Reversals, Product Changes and Conversions to Service? See ADP-2014-04	1	1
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Needs Improvement = .5 No = 0 Yes = 1

Evaluator Notes:

Yes, they have added to their inspections.

23 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

C6 - The TX RRC is not complying with their procedures in inspecting units within the time intervals established. The main issue is the time intervals between specialized inspections (OQ, IMP). In reviewing the yearly work plan there are some operators that have not had a specialized inspection (OQ, IMP) within the five year interval. Example Inspection Packages; #115558-IMP, #116027-IMP, #116538-OQ, The TX RRC needs to improve on the inspection interval to meet their established intervals per their procedures. Loss of 1 Point

C13 - Inspections completed use inspection forms that include a previous review of IMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review takes in to account program review and updates of operators plan(s) per 49 CFR 195.452 Subpart c. The individuals performing these inspections met PHMSA qualification requirements. Tx RRC is not meeting their 5 year re-inspection interval for all intrastate regulated Operator's IM Plans, which is noted on question C6. Loss of 1 point

C18 - Stephanie Weidman, the program manager, has reviewed the status of all waivers granted in Texas and is now in the process of having the status of each up dated. She will be working with Kay MacGyver in PHMSA HQ. (Recommendation to be reviewed in 2019 evaluation)

Total points scored for this section: 40
Total possible points for this section: 42



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. Section 3.6 has procedure to notify an operator when a noncompliance is identified.
 - A'. Section 3.2.2 send notice to corp officer or mayor.
 - b. Section 10 Compliance and Enforcement Procedures.
 - c. appendix B flowchart.
- Changed procedures so did not include mayor or owner of master meter. will make changes to procedures to include mayor and owner.

- | | | | |
|----------|--|--------------------------------------|--|
| 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 director 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. | Within 30 days, conduct a post-inspection briefing with the owner or operator of the gas or hazardous liquid pipeline facility inspected outlining any concerns; and | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| f. | Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

Compliance actions are tracked through the Pipeline Evaluation System (PES) Civil penalties are in statue and there are guidelines for assessment. No issues were identified.

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

Evaluator Notes:

HL review of Accidents:
0 injuries
0 fatalities
58 cost between \$50K & \$6.62M
Reviewed the 7 most expensive accidents: Incident ID numbers; 1637, 1518, 1566, 1642, 1616, 1548, 1634. Also, 5 add'l accidents with enforcement actions: Package ID numbers (incident ID): 114830 (1512), 116136 (1627), 116640 (1670), 114756 (1509), 115540 (1571).

- | | | | |
|----------|---|---|---|
| 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. Texas Administrative Code (TAC) 121.206 and 207 has "Shoe Cause" hearing process.

- 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) 2 2
Yes = 2 No = 0

Evaluator Notes:

Program Manager is aware of the civil penalty process. TAC 8.135 is law which states civil penalty actions. A panel consisting of Kari French, Jim Osterhous, and Stephanie Wiedner decide on accessing and the amount of civil penalty. They are now using the state guidelines for the amount of civil penalties.

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

Evaluator Notes:

Yes. The TXRRC had 30 compliance actions in 2017 with \$18500.00 in civil penalties. All penalties were collected in 2017.

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

Evaluator Notes:

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



PART E - Accident Investigations

Points(MAX) Score

- | | | | |
|---|--|---|---|
| 1 | Does the state have written procedures to address state actions in the event of an incident/ accident?
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

SOG Section 8 has procedures for addressing incident/accident investigations. 8.1.1.2 addresses the need for documentation to verify there's sufficient data gathered if no onsite investigation was made.

- | | | | |
|---|---|---|---|
| 2 | Does state have adequate mechanism to receive and respond to operator reports of accidents, including after-hours reports? And did state keep adequate records of Incident/Accident notifications received? Chapter 6
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

- | | | | | |
|----|--|--------------------------------------|--------------------------|---|
| a. | Acknowledgement of MOU between NTSB and PHMSA (Appendix D) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

TXRRC has a 24 hour answering system that transfers calls to on call inspector. Section 18 has incident procedures. On site investigation will be conducted on all reportable incidents. Have acknowledgement of MOU and of federal/state cooperation in case of an incident/accident.

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

Evaluator Notes:

Reviewed incident telephonic reports and they had sufficient information to support that no onsite investigation was needed. Procedure states that they would gather sufficient information to support their decision not to go onsite.

- | | | | |
|---|---|---|---|
| 4 | Were all accidents investigated, thoroughly documented, and with conclusions and recommendations?
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
|---|---|---|---|

- | | | | | |
|----|--|--------------------------------------|--------------------------|---|
| a. | Observations and document review | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Contributing Factors | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Recommendations to prevent recurrences where appropriate | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

a. RRC documents all observations in PES and on PHMSA Form 11. b. Contributing factors were documented on their investigation reports. c. The information from the investigations is being reviewed for recommendations from the operator to reduce recurrences of failures.

- | | | | |
|---|---|---|---|
| 5 | Did the state initiate compliance action for violations found during any incident/accident investigation?
Yes = 1 No = 0 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

Hazardous liquid incidents were reviewed and compliance actions were issued for all violations found during the investigations.

- | | | | |
|---|--|---|---|
| 6 | Did the state assist Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator accident reports to ensure accuracy and final report has been received by PHMSA? (validate report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

The TX RRC works with PHMSA AID and the region to provide updates and information.

- 7 Does state share lessons learned from incidents/accidents? (sharing information, such as: 1 1
at NAPS SR Region meetings, state seminars, etc)
Yes = 1 No = 0

Evaluator Notes:

Yes, the TX RRC shares lessons learned during their State of the State address during the annual NAPS SR SW Region meetings..

8 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

Total points scored for this section: 11
Total possible points for this section: 11



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

Evaluator Notes:

Yes, the TX RRC has added question to Standard Inspection reports on Hazardous liquid, distribution, and transmission inspections.

- | | | | |
|--------------------------------------|--|---|---|
| 2 | Did the state inspector verify pipeline operators are following their written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? | 2 | 2 |
| Yes = 2 No = 0 Needs Improvement = 1 | | | |

Evaluator Notes:

Yes, the TX RRC has added question to Standard Inspection reports on Hazardous liquid, distribution, and transmission inspections.

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

Evaluator Notes:

Yes. Yes, the TX RRC did 20 events in 2017 where they presented and material was handed out. Mock Line Strike ? a full mobilization PL incident drill.

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

Evaluator Notes:

Yes, the RRC collects data on a monthly basis and their damages per 1000 locates dropped from 3.20 to 3.03 from 2015 to 2016, and remain the same for 2017. The damages have been cut in half since 2008.

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

Evaluator Notes:

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

PART G - Field Inspections

Points(MAX) Score

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

Name of Operator Inspected:

(1) Enterprise Pipeline; (2) Pasadena Refinery (PRSI)

Name of State Inspector(s) Observed:

(1) Larry Snelson; (2) Kennedy Kiprotich

Location of Inspection:

(1) Houston, TX; (2) Pasadena, TX

Date of Inspection:

(1) October 23-27, 2017 & February 21-23, 2018; (2) March 5-9, 2018

Name of PHMSA Representative:

(1) Chris McLaren; (2) Agustin Lopez

Evaluator Notes:

(1) Chris McLaren's (PHMSA PHP50) Field Evaluation of the Great State of Texas' Railroad Commission's Hazardous Liquid Integrity Management Inspection of Enterprise Products Pipeline Inspections conducted October 23 - 27, 2017 & February 21 - 23, 2018.

(2) Evaluated Mr. Kennedy Kiprotich conduct an inspection of Pasadena Refinery pipeline systems. He inspected three pipelines which included portions of the O&M Procedures, records and a field inspection.

- 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:

(1) Yes. 1 Point. Many emails were exchanged TRRC and John D. Tresp, Sr. Pipeline Compliance Engineer, 1100 Louisiana St. Houston, TX 77002, Desk: 713-381-6831, Cell: 832-675-0674, jdtresp@eprod.com

(2) Yes, the operator was notified with enough notice and given the opportunity to have personnel present.

- 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:

(1) Yes ? 2 Points. PHMSA HL IM Protocol Form revised September 2017 was used for the inspection. TRRC State Procedures for conducting IM inspections reviewed and checked for the conduct of the inspection (TRRC Guidelines Section 17 ? IM Inspections).

(2) Yes, the inspector utilized the HL inspection form to use as a guide and to documents results of inspection.

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

Evaluator Notes:

(1) Yes ? 2 Points. PHMSA Gas IM Protocol Form revised September, 2017 was completed for the inspection. This form was attempted to be uploaded to the HL IMDB. However, TRRC has been receiving error messages ? like Line 115 error? Question C-13 & 14 has been modified in the State Evaluation Form, so States are no longer required to upload IM or OQ results to the external databases.

(2) Yes, the inspector documented results on the inspection form and on the PEZ database.

- 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) 1 1
Yes = 1 No = 0

Evaluator Notes:

- (1) Yes ? 1 Point. This was an office based inspection of the IM program. The operator did use the appropriate equipment for this type of inspection (e.g., GIS, Risk Model, MOP calculator, PODS data base, etc.).
- (2) Yes, the inspector verified that he operator had appropriate equipment to perform the tasks during the field inspection.

-
- 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:

- (1) Yes ? 2 Points. Procedures, forms, records, computer systems, applications, databases, etc. were all reviewed during the inspection at the appropriate level. Many integrity assessment results (pressure tests, ILI, associated repair records) were reviewed during the inspection.
- (2) Yes, the inspector reviewed portions of the O&M Manual that pertained to the inspection. He also reviewed records and concluded the inspection with a field inspection of the pipeline facilities.

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

Evaluator Notes:

- (1) Yes ? 2 Points. The Lead inspectors and other inspectors exhibited an understanding of the pipeline safety program and the applicable regulations. Here are the inspectors' experience that attended:
- ? Samuel Copeland ? many IM inspections ? lead TRRC inspector for IM inspections
 - ? Larry Snelson ? many IM inspections
 - ? Jennifer Delaruz ? some IM inspections
 - ? Isaac Mourreal ? some IM inspections
 - ? Erik Trevino ? some IM inspections
 - ? Maud Lucie Sainvilus - few IM inspections
- (2) Yes, Mr. Kiprotich demonstrated adequate knowledge of the pipeline safety rules and regulations. He explained to the operator what was required of the regulations whenever the operator had questions. He is a good asset to the RRC.

-
- 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) 1 1
Yes = 1 No = 0

Evaluator Notes:

- (1) Yes ? 1 Point. An exit interview was conducted during both weeks of the inspection, and written notice was provided to the office and/or authorized official identifying any noncompliance noted during the inspection.
- (2) Yes, the inspector concluded the inspection with an exit interview. He summarized the inspection and notified the operator of any potential violations.

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

Evaluator Notes:

(1) Yes ? 1 Point. Areas of concern and comments were discussed during the exit interview for both weeks. A probable violation was not identified during the inspection. An exit interview was conducted and written notice was provided to the office and/or authorized official identifying any noncompliance noted during the inspection. No significant issues were noted during this inspection. Concerns discussed included Lack of formally documented communication between departments (identified as a compliance issue on the gas IM inspection), treatment of incorrect operations as this is the cause of failures and the actions to prevent recurrence should be improved ? follow-up on accident investigation by Isaac will cover this issue also. Program strength included that the Operator elects to do additional discretionary digs beyond the required criteria (discretionary digs on certain tools).

(2) Yes, the inspector covered any probable violations found during the inspections. The main concern was the amount of atmospheric corrosion on the pipeline facilities.

10	<p>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</p> <p>Info Only = No Points</p> <ul style="list-style-type: none"> a. Abandonment b. Abnormal Operations c. Break-Out Tanks d. Compressor or Pump Stations e. Change in Class Location f. Casings g. Cathodic Protection h. Cast-iron Replacement i. Damage Prevention j. Deactivation k. Emergency Procedures l. Inspection of Right-of-Way m. Line Markers n. Liaison with Public Officials o. Leak Surveys p. MOP q. MAOP r. Moving Pipe s. New Construction t. Navigable Waterway Crossings u. Odorization v. Overpressure Safety Devices w. Plastic Pipe Installation x. Public Education y. Purging z. Prevention of Accidental Ignition A. Repairs B. Signs C. Tapping D. Valve Maintenance E. Vault Maintenance F. Welding G. OQ - Operator Qualification H. Compliance Follow-up I. Atmospheric Corrosion J. Other 	<p>Info OnlyInfo Only</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
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Evaluator Notes:

(1) - Office based inspection of IM program was conducted. A team based approach was utilized (good) as different inspectors have specific field knowledge of various portions of the Enterprise Hazardous Liquid assets. Specific records for each of the protocol areas were appropriately reviewed during the inspection. The inspection was conducted in a thorough and appropriately paced manner which allowed for all inspectors to read and think about the question and review information and ensure topics were appropriately discussed.

(2) The inspector conducted a standard inspection of Pasadena Refinery pipelines. He reviewed portions of the O&M Manual and reviewed records. He also performed a field inspection of the pipeline facilities. He performed a very thorough inspection and conducted himself very professionally.

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:

TXRRC is not an interstate agent

- | | | | |
|----------|---|---|----|
| 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:

TXRRC is not an interstate agent

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

Evaluator Notes:

TXRRC is not an interstate agent

- | | | | |
|----------|---|---|----|
| 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:

TXRRC is not an interstate agent

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

Evaluator Notes:

TXRRC is not an interstate agent

- | | | | |
|----------|--|---|----|
| 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:

TXRRC is not an interstate agent

- | | | | |
|----------|---|---|----|
| 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:

TXRRC is not an interstate agent

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

Evaluator Notes:

TXRRC is not an interstate agent

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:

TXRRC does not have a 60106 agreement

- | | | | |
|----------|--|---|----|
| 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:

TXRRC does not have a 60106 agreement

- | | | | |
|----------|---|---|----|
| 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:

TXRRC does not have a 60106 agreement

- | | | | |
|----------|---|---|----|
| 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:

TXRRC does not have a 60106 agreement

- | | | | |
|----------|--|---|----|
| 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:

TXRRC does not have a 60106 agreement

- | | | | |
|----------|--|---|----|
| 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:

TXRRC does not have a 60106 agreement

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

Evaluator Notes:

TXRRC does not have a 60106 agreement

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