



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

1200 New Jersey Avenue SE
Washington DC 20590

2018 Gas State Program Evaluation

for

Louisiana Department of Natural Resources

Document Legend

PART:

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



2018 Gas State Program Evaluation -- CY 2018

Gas

State Agency: Louisiana

Agency Status:

Date of Visit: 04/23/2019 - 05/09/2019

Agency Representative: Michael Peikert, Assistant Director

PHMSA Representative: Don Martin

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

Name/Title: Richard Ieyoub, Commissioner

Agency: Louisiana Department of Natural Resources-Office of Conservation

Address: 617 North Third Street

City/State/Zip: Baton Rouge, Louisiana 70802

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 2018 (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.

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

10	7.5
13	13
48	43
15	15
11	11
8	8
12	12
0	0
0	0

TOTALS

117 109.5

State Rating

93.6

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:

Upon review of the LADNR's spreadsheet which lists operators and units, no errors were found.

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

Evaluator Notes:

Needs Improvement. Integrity Management person days for Private Distribution should have been 58 instead of 13. Standard Inspection person days for Intrastate Transmission should have been 400 instead of 411. Construction Inspection person days should have been 6 instead of 23. Standard Inspection person days should have been 118 instead of 197. Operator Qualifications Inspection Person Days for Master Meter Operators were incorrect. The Progress Report will need to be revised.

- | | | | |
|---|--|---|-----|
| 3 | Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 0.5 |
|---|--|---|-----|

Evaluator Notes:

Attachment 3 shows a total of 95 Inspection Units for Municipal Operators. The correct number should be 94 (as shown on Attachment 1). Oberlin was taken over by CenterPoint Energy.

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

The four reports listed in the Pipeline Data Mart (PDM) were shown in Attachment 4.

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

Evaluator Notes:

Needs Improvement. The number of Probable Violations Found was reported as 187 but 13 were inadvertently included from Hazardous Liquid Operators. The correct number should be 174. The same issue occurred with Probable Violations Corrected. Attachment 5 shows 235 but it should have been 223.

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

Evaluator Notes:

The LADNR's hardcopy file were observed in the file room. All appeared to be well organized. The LADNR's electronic files were well organized and very easy to access. No issues were noted.

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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:

Listing individuals were verified. Inspector Categories were reviewed and deemed correct. Training information was imported by PHMSA Training and Qualifications Division.

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|---|--|---|---|
| 8 | Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8 | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No issues were found with latest adoptions of amendments.

- 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:

No issues found with the information contained in Attachment 10.

10 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

A.2 - Needs Improvement. Integrity Management person days for Private Distribution should have been 58 instead of 13. Standard Inspection person days for Intrastate Transmission should have been 400 instead of 411. Construction Inspection person days should have been 6 instead of 23. Standard Inspection person days should have been 118 instead of 197. Operator Qualifications Inspection Person Days for Master Meter Operators were incorrect. The Progress Report will need to be revised.

A.3 - Attachment 3 shows a total of 95 Inspection Units for Municipal Operators. The correct number should be 94 (as shown on Attachment 1). Oberlin was taken over by CenterPoint Energy. The Progress Report will need to be revised.

A.5 - Needs Improvement. The number of Probable Violations Found was reported as 187 but 13 were inadvertently included from Hazardous Liquid Operators. The correct number should be 174. The same issue occurred with Probable Violations Corrected. Attachment 5 shows 235 but it should have been 223. The Progress Report will need to be revised.

Total points scored for this section: 7.5
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:

The LADNR's INSPECTION GUIDANCE document, revised 5/2/19, was reviewed. The guidance meets the requirement that inspectors have procedures that promote consistency. Pre-inspection, inspection activity, and post-inspection portions of an inspection are covered. No issues.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The LADNR's INSPECTION GUIDANCE document, revised 5/2/19, was reviewed. The guidance meets the requirement that inspectors have procedures that promote consistency. Pre-inspection, inspection activity, and post-inspection portions of an inspection are covered. The inspection modules provide additional information on details for HL IMP and inspections.

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

The LADNR's INSPECTION GUIDANCE document, revised 5/2/19, was reviewed. The guidance meets the requirement that inspectors have procedures that promote consistency. Pre-inspection, inspection activity, and post-inspection portions of an inspection are covered. The inspection modules provide additional information on details for OQ inspections.

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

The LADNR's INSPECTION GUIDANCE document, revised 5/2/19, was reviewed. The guidance meets the requirement that inspectors have procedures that promote consistency. Pre-inspection, inspection activity, and post-inspection portions of an inspection are covered. The inspection modules provide additional information on details for Damage Prevention inspections.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The LADNR's INSPECTION GUIDANCE document, revised 5/2/19, was reviewed. The guidance meets the requirement that inspectors have procedures that promote consistency. Pre-inspection, inspection activity, and post-inspection portions of an inspection are covered. The inspection modules provide additional information on details for Damage Prevention inspections.

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

The LADNR's INSPECTION GUIDANCE document, revised 5/2/19, was reviewed. The guidance meets the requirement that inspectors have procedures that promote consistency. Pre-inspection, inspection activity, and post-inspection portions of an inspection are covered. The inspection modules provide additional information on details for Construction inspections.

- | | | | |
|----------|---|--------------------------------------|--|
| 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 areas, Population Density, etc) | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| e. | Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors) | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| f. | Are inspection units broken down appropriately? | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

The LADNR's PIPELINE SAFETY PROGRAMS GUIDELINES FIELD INSPECTIONS FOR GAS AND LIQUIDS OPERATORS INSPECTION PRIORITIZATION AND PROCEDURES document was reviewed. The guidance meets the requirement for prioritizing inspection units. The guidance includes the following statement:

"If an inspection indicates portions of the operators' system is not being properly operated and maintained as required by the written procedures. Other means of criteria utilized for both Comprehensive (Standard) and Specialized inspections may be based upon the risk analysis (risk model developed by LDNR) for the operator's system and operations. This risk based approach could be based upon the inspectors' records, operators' records, historical high risk areas, past operator performance in those areas, etc. Non-routine activities undertaken by the operator such as construction, change of personnel, acquisitions and mergers, and significant changes, etc. in procedures would be activities which could require an inspection prior to the scheduled annual inspection."

8 General Comments:

Info Only = No Points

Info Only Info Only

Evaluator Notes:

No issues were identified with the requirements of Part B of this evaluation.

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):
1826.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 15.35 = 3376.63

Ratio: A / B
1826.00 / 3376.63 = 0.54

If Ratio \geq 0.38 Then Points = 5, If Ratio $<$ 0.38 Then Points = 0
Points = 5

Evaluator Notes:

The minimum inspection day to person year ratio was .61 which exceeds .38 minimum.

- 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 checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Completion of Required DIMP*/IMP Training before conducting inspection as lead? *Effective Evaluation CY2013 | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Root Cause Training by at least one inspector/program manager | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. | Note any outside training completed | Yes <input checked="" type="radio"/> | No <input 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 checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

Timelines for training have been met or are on track to meet timelines for those who have not completed all of the training. Upon a review of randomly selected inspection reports no instances were found where a lead inspectors did not have the required training. Outside training included LGA Education Seminar, outside training on seminar for Drilling, Tapping and Stopple Procedures and a Cathodic Protection seminar on August 14 & 15, 2018.

- 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:

Michael Peikert was named Program Manager in August, 2017. Michael was an Engineer in the LADNR pipeline safety program from 2004 to 2018. He is knowledgeable of the pipeline safety regulations. He has completed the core training classes for gas and hazardous liquid programs and is taking the additional classes for special inspections (OQ, IMP, etc.).

- 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:

The LADNR responded in 36 days. The LADNR addressed the deficiencies described in the letter.

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

Evaluator Notes:

The LA DNR holds a pipeline safety seminar annually.

LADNR conducts an annual Small operator seminar. The MSDPU attends the annual LGA operators' conference.

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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 | 0 |
|----------|--|---|---|

Evaluator Notes:

No. The LADNR has not inspected several gas inspection units within the five year time frame. The LA DNR is hopeful with the addition of inspection positions filled that inspection units will be back on schedule by the end of 2019.

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

Evaluator Notes:

Questions on the LADNR's comprehensive inspection form was compared to the federal standard inspection forms (Distribution and Transmission). No discrepancies were found. The LADNR utilizes the federal inspection forms for all other inspection types.

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|----------|---|---|---|
| 8 | Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Yes, there is a question on the LADNR's form, Page 34, that is completed during each Standard Distribution Inspection.

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|----------|--|---|---|
| 9 | Did the state review operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance) (NTSB) Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

This requirement is covered on Page 45 of the Comprehensive Inspection Form.

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| 10 | Did the state review operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21? (NTSB) Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

This requirement is covered on Page 11 of the Comprehensive Inspection Form.

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- | | | | |
|-----------|--|---|---|
| 11 | Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 192.617? Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|
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Evaluator Notes:

This requirement is covered on Page 6 of the Comprehensive Inspection Form.

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

Evaluator Notes:

Review for accuracy and differences from previous years, lost and unaccounted for. trends damages, leak repairs mechanical fitting failures. etc.

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|-----------|---|---|---|
| 13 | Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|
-

Evaluator Notes:

This requirement is covered on Page 4 of the Comprehensive Inspection Form.

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|-----------|---|---|---|
| 14 | 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:

The LA DNR conducted 48 Drug and Alcohol Inspections during CY2018.

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|-----------|---|---|---|
| 15 | Is state verifying operators OQ programs are up to date? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals determined in the operators plan. 49 CFR 192 Part N
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

The LADNR experienced approximately 300 inspection person days on OQ inspections during CY2018.

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| 16 | Is state verifying operator's gas transmission integrity management programs (IMP) are up to date? This should include a previous review of IMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review should take in to account program review and updates of operators plan(s). (Are the State's largest operators programs being contacted or reviewed annually? Are replies to Operator IM notifications addressed? (formerly part of Question C-13)). 49 CFR 192 Subpart O
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

The LADNR spent 68 inspection person-days conducting Transmission IMP inspections during 2018. The LADNR has identified a higher focus for IMP and DIMP in future inspection plans.

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| 17 | Is state verifying operator's gas distribution integrity management Programs (DIMP)? This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). (Are the State's largest operators programs being contacted or reviewed annually?). 49 CFR 192 Subpart P
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|
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Evaluator Notes:

The LADNR had 18 inspection person days on DIMP inspections during CY2018.

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- | | | | |
|-----------|---|---|---|
| 18 | Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. PAPEI Effectiveness Inspections should be conducted every four years by operators. 49 CFR 192.616
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|
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Evaluator Notes:

The first round of Public Awareness Plan inspections and effectiveness reviews have been completed. The LADNR began a second round of these inspections during 2018.

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

Evaluator Notes:

Examples are Website, damage prevention conference, LGA two each year, Public Awareness Liaison routinely through state, LA Mid Continent OG Midstream Committee. The website was revised to add updated rules. The LA DNR also launched a mobile friendly layout.

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|-----------|---|---|---|
| 20 | 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:

There were no SRCR's listed for gas operators in the Pipeline Data Mart (PDM).

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|-----------|---|---|---|
| 21 | Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|
-

Evaluator Notes:

This requirement is covered on Page 17 of the Comprehensive Inspection Form.

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|-----------|--|---|---|
| 22 | Did the state participate in/respond to surveys or information requests from NAPSRS or PHMSA?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|
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Evaluator Notes:

There were no instances found where the LADNR did not respond.

- | | | | |
|-----------|--|---|---|
| 23 | If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate.
No = 0 Needs Improvement = .5 Yes = 1 | 1 | 1 |
|-----------|--|---|---|
-

Evaluator Notes:

The LADNR has no active waivers.

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|-----------|--|---|---|
| 24 | Did the state attend the NAPSRS National Meeting in CY being evaluated?
No = 0 Needs Improvement = .5 Yes = 1 | 1 | 1 |
|-----------|--|---|---|
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Evaluator Notes:

Yes, the LADNR attended the National Meeting in Santa Fe, NM.

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|-----------|---|---|---|
| 25 | Discussion on State Program Performance Metrics found on Stakeholder Communication site - http://primis.phmsa.dot.gov/comm/states.htm
No = 0 Needs Improvement = 1 Yes = 2 | 2 | 2 |
|-----------|---|---|---|
-

a. Discussion of Potential Accelerated Actions (AA's) based on any negative trends Yes ☒ No ☐ Needs Improvement ☐

b. NTSB P-11-20 Meaningful Metrics

Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

A review was conducted of the performance metrics contained in the Pipeline Data Mart. Excavation damages are trending in a slightly negative direction. The LA DNR is aware of this trend and has placed higher priority on enforcement activity now that the LA DNR has authority over damage prevention enforcement. All other metrics are acceptable at this time when considering the number new inspector hired and the time required to complete training course.

- | | | | |
|----|--|---|---|
| 26 | Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT) Has the State updated SICT data?
No = 0 Yes = 1 | 1 | 1 |
|----|--|---|---|

Evaluator Notes:

Discussed need to review construction days for adequacy; making sure there is a distinction Private LDC's and Municipal operators to make sure progress report data lines up; verify that control room management inspections are being considered for applicable operators and that applicable requirements are known.

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|----|--|---|----|
| 27 | Did the State verify Operators took appropriate action regarding Pipeline Flow Reversals, Product Changes and Conversions to Service? See ADP-2014-04
Needs Improvement = .5 No = 0 Yes = 1 | 1 | NA |
|----|--|---|----|

Evaluator Notes:

There were no flow reversals that occurred during CY2018.

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|----|--|-----------|-----------|
| 28 | General Comments:
Info Only = No Points | Info Only | Info Only |
|----|--|-----------|-----------|

Evaluator Notes:

Question C.6 - No. The LADNR has not inspected several gas inspection units within the five year time frame. The LA DNR is hopeful with the addition of inspection positions filled that inspection units will be back on schedule by the end of 2019.

Total points scored for this section: 43
Total possible points for this section: 48



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:

Yes. The LADNR has established procedures describing the steps to execute non-compliance actions and communicate the issues to operators. Non-compliance letters to operators provide a description of the steps. The LADNR's inspection and compliance database system is able to monitor the progress of the steps until the inspection file is closed.

- | | | | |
|----------|--|---|---|
| 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? (Incident Investigations do not need to meet 30/90 day requirement) Chapter 5.1
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| a. | Were compliance actions sent to company officer or manager/board member if municipal/government system? | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Document probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Resolve probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. | Routinely review progress of probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e. | 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:

Upon a review of randomly selected inspection reports, no instances were found where the LA DNR did not meet the requirements in a. through f.

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

Evaluator Notes:

Upon a review of randomly selected inspection reports, no instances were found where the LA DNR did not issue a compliance action.

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

Reasonable due process was provided to all parties in the inspection reports that were reviewed in a random sample.

- | | | | |
|----------|---|---|---|
| 5 | Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

Yes. The program manager provided a process with pre-determined criteria for the decision to issue a citation and the amount of the civil penalty.

- | | | | |
|----------|--|---|---|
| 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 LADNR has consistently issued civil penalties in past years. \$40,750 in civil penalties were issued in CY2018.

7 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

No issues requiring a reduction in points was found in Part D of this evaluation.

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



PART E - Incident Investigations

Points(MAX) Score

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

Evaluator Notes:

Yes. The LADNR has procedures titled "GUIDELINES FOR FORMING AN ACCIDENT RESPONSE TEAM". No deficiencies were found in the procedures.

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

- a. Acknowledgement of MOU between NTSB and PHMSA (Appendix D) Yes ☒ No ☐ Needs Improvement ☐
b. Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E) Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

Yes. The LADNR has an established phone number for operators to call in the event of an incident. Operators also have the contact information for inspectors in the LADNR. The Assistant Director and Director will be notified by these methods of contact. They will initiate the needed actions to perform investigations of the incidents/accidents. They are aware of their investigation responsibilities and coordination with federal authorities.

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

Evaluator Notes:

The LADNR understands the methods to gather the needed information is an on-site investigation is not required. Upon a review of the reported incidents during 2018, no issues were found with the LADNR's handling of the incident investigations.

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

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

Evaluator Notes:

No issues were identified that resulted in the loss of points.

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

Evaluator Notes:

Two of the four incidents resulted in enforcement proceedings. One resulted in \$2000 (Entergy New Orleans) penalty and another resulted in a \$7500 (Acadian at Napoleonville).

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

Evaluator Notes:

In an email response to the evaluator on May 29/2019, the AID confirmed that the LADNR complied with the requirements of this question.

- 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 LADNR has shared facts about its investigations at the NAPS SR Southwest Region meeting each year.

8 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

There were no issues identified that resulted in a loss of points.

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

Evaluator Notes:

The MADPU covers this regulatory requirement on Page 10 of its Comprehensive (Standard) Inspection for Gas Transmission and Distribution operators.

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

Evaluator Notes:

The MADPU covers this regulatory requirement on Page 10 of its Comprehensive (Standard) Inspection for Gas Transmission and Distribution operators.

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

Evaluator Notes:

Adopted the nine elements. The LADNR provides presentation for stakeholders at the LA Damage Prevention Summit, LA Gas Assoc. and Pipeline Safety Seminar. The LADNR has enforcement authority since June of 2017.

- | | | | |
|---|--|---|---|
| 4 | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests? (This can include DIRT and other data shared and reviewed by the pipeline safety program)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes. The LADNR has taken information from the annual reports and entered into a spreadsheet to view trends on excavation damage. The information is also kept at the operator level in order to drill down on troubled operators in relation to damages. Discussions have been held with operators that have poor statistics.

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

Evaluator Notes:

No issues were found with Part F requirements.

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. Town of Krotz Springs Utilities 2. Town of Washington Utilities 3. CenterPoint Energy

Name of State Inspector(s) Observed:

Kelvin Snellgrove

Location of Inspection:

1. Krotz Springs, LA 2. Washington, LA 3. Broussard, LA

Date of Inspection:

1. April 23,2019 2. April 24, 2019 3. April 25, 2019

Name of PHMSA Representative:

Don Martin

Evaluator Notes:

1. Comprehensive Standard Inspection was conducted previous week. Outstanding issues were followed up during this inspection.
2. Re-inspection to follow-up on deficiencies found during a Comprehensive Standard Inspection conducted March 15, 2018. Corrections to eight deficiencies were reviewed.
3. Specific Inspection
3. Conducted specific inspection (portion of Comprehensive Standard) of CenterPoint's Broussard, New Iberia and Youngsville Inspection Units.

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:

1,2 and 3. - Yes, one month prior to inspection.

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

Evaluator Notes:

Yes. Proper inspection forms were utilized.

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

Evaluator Notes:

Yes, all results were entered into the forms.

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

Evaluator Notes:

1. and 2. - Cathodic Protection testing equipment was inspected and calibration verified.
3. Not applicable due to records review only on the day of the evaluation.

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	<input checked="" type="checkbox"/>
b. Records	<input checked="" type="checkbox"/>
c. Field Activities	<input checked="" type="checkbox"/>

d. Other (please comment)

☐

Evaluator Notes:

No issues were identified with the coverage of the inspections.

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:

Yes, all courses at Training and Qualifications Division have been completed by the inspector. He exhibited very good knowledge of regulatory requirements.

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:

Yes, the inspector conducted an exit briefing for each of the inspections.

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, the inspector covered all of the deficiencies found during the inspection and provided information on the next steps in the enforcement process.
2. This was a review of corrections to deficiencies found during the previous Standard Inspection. The inspector provided a summary of the acceptability of the corrections or if further action was needed.
3. The inspector summarized the results of the inspection. He stated no probable violations were found during the inspection on this day.
3. Yes, the inspector provided a summary of the records review during the time of the evaluation.

10 General Comments: 1) What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) 2) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) 3) Other.

Info Only Info Only

Info Only = No Points

- a. Abandonment
- b. Abnormal Operations
- c. Break-Out Tanks
- d. Compressor or Pump Stations
- e. Change in Class Location
- f. Casings
- g. Cathodic Protection
- h. Cast-iron Replacement
- i. Damage Prevention
- j. Deactivation
- k. Emergency Procedures
- l. Inspection of Right-of-Way
- m. Line Markers
- n. Liaison with Public Officials
- o. Leak Surveys
- p. MOP
- q. MAOP
- r. Moving Pipe
- s. New Construction
- t. Navigable Waterway Crossings

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- | | | |
|----|-----------------------------------|-------------------------------------|
| 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 checked="" type="checkbox"/> |
| J. | Other | <input type="checkbox"/> |

Evaluator Notes:

No issues were found that resulted in the loss of points.

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:

The LADNR 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:

The LADNR 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:

The LADNR 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:

The LADNR 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:

The LADNR 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:

The LADNR 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:

The LADNR is not an interstate agent.

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

Evaluator Notes:

The LADNR 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:

The LADNR 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:

The LADNR 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:

The LADNR 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:

The LADNR 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:

The LADNR 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:

The LADNR does not have a 60106 agreement.

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

Evaluator Notes:

The LADNR does not have a 60106 agreement.

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