



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

1200 New Jersey Avenue SE  
Washington DC 20590

# 2014 Hazardous Liquid State Program Evaluation

for

MARYLAND PUBLIC SERVICE COMMISSION

## Document Legend

### PART:

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



2014 Hazardous Liquid State Program Evaluation -- CY 2014  
Hazardous Liquid

**State Agency:** Maryland  
**Agency Status:**  
**Date of Visit:** 04/01/2015 - 04/07/2015  
**Agency Representative:** John Clementson  
**PHMSA Representative:** Jim Anderson  
**Commission Chairman to whom follow up letter is to be sent:**  
**Name/Title:** W. Kevin Hughes, Chairman  
**Agency:** Maryland Public Service Commission  
**Address:** 6 St. Paul Street, 19th Floor  
**City/State/Zip:** Baltimore, MD 21202-6806

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

**INSTRUCTIONS:**

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2014 (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**

<b>PARTS</b>	<b>Possible Points</b>	<b>Points Scored</b>
A Progress Report and Program Documentation Review	9	9
B Program Inspection Procedures	13	12.5
C Program Performance	41	38
D Compliance Activities	15	15
E Accident Investigations	5	5
F Damage Prevention	8	8
G Field Inspections	10	10
H Interstate Agent State (if applicable)	0	0
I 60106 Agreement State (if applicable)	0	0
<b>TOTALS</b>	<b>101</b>	<b>97.5</b>
<b>State Rating</b> .....		<b>96.5</b>



# PART A - Progress Report and Program Documentation Review

Points(MAX) Score

<b>1</b>	Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1 Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:  
No issues. Only one operator.

<b>2</b>	Review of Inspection Days for accuracy - Progress Report Attachment 2 Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:  
No issues.

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

<b>4</b>	Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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Evaluator Notes:  
No accidents in 2014.

<b>5</b>	Accuracy verification of Compliance Activities - Progress Report Attachment 5 Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:  
No issues.

<b>6</b>	Were pipeline program files well-organized and accessible? - Progress Report Attachment 6 Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:  
Yes. Has new data base that can also be accessed remotely.

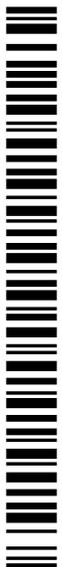
<b>7</b>	Was employee listing and completed training accurate and complete? - Progress Report Attachment 7 Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:  
No issues.

<b>8</b>	Verification of Part 195,198,199 Rules and Amendments - Progress Report Attachment 8 Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:  
Maryland has automatic adoption of federal safety regulations.

<b>9</b>	List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10 Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

No issues. Only one operator with 3 miles of pipeline.

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**10** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

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



# 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.

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Listed in written procedures on page 3.

- 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.

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Listed in written procedures on page 3.

- 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.

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Listed in written procedures on page 3.

- 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.

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Listed in written procedures on page 3.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Needs improvement. Not listed in written procedures.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Listed in written procedures on page 3.

- 7 Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements?

Yes = 6 No = 0 Needs Improvement = 1-5

- a. Length of time since last inspection (Within five year interval)

Yes  No  Needs Improvement

- b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) Yes  No  Needs Improvement
- c. Type of activity being undertaken by operators (i.e. construction) Yes  No  Needs Improvement
- d. Locations of operators inspection units being inspected - (HCA's, Geographic area, Population Density, etc) Yes  No  Needs Improvement
- 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  No  Needs Improvement
- f. Are inspection units broken down appropriately? Yes  No  Needs Improvement

Evaluator Notes:

Starts on page 4 of the written inspectin procedures. Also, now has new database program to remind inspectors of what form to use and when the form is due to maintain comprehensive inspection schedule.

**8** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Total points scored for this section: 12.5  
 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  
 Yes = 5 No = 0
- A. Total Inspection Person Days (Attachment 2):  
 10.50
- B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
 220 X 0.12 = 26.40
- Ratio: A / B  
 10.50 / 26.40 = 0.40
- If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0  
 Points = 5

Evaluator Notes:

.40 ratio is greater than the needed .38 ratio.

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

Evaluator Notes:

All inspectors completed training for standard inspection. The Program Manager and 3 pipeline safety engineers have had their IMP, DIMP, OQ and Root Cause training. No issues.

- 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  
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

John Clementson, program manager, has been in the pipeline safety program for 17 years and on many NAPSRS committees. No issues.

- 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  
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

The letter was sent within the 60 day time period. Deficiencies not corrected. Needs improvement.

- 5** Did State hold PHMSA TQ Seminar in Past 3 Years? Chapter 8.5  
 Yes = 2 No = 0

Evaluator Notes:

Yes. Last held seminar in April 2014.

- 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

Evaluator Notes:



Needs improvement. Inspection unit not inspected in reference to written procedures time schedule, OQ was inspected with time schedule. Now has database to track inspections and timetable for inspections.

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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.

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8	Did the state review operator procedures for determining areas of active corrosion on liquid lines in sufficient detail? (NOTE: PHMSA representative to describe state criteria for determining areas of active corrosion) Yes = 1 No = 0	1	1
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Evaluator Notes:  
Yes. Last inspected in nov. 2013 using form EN53 for the records and EN41 for field inspection in Dec. 2014.

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9	Did the state adequately review for compliance operator procedures for abandoning pipeline facilities and analyzing pipeline accidents to determine their causes? (NOTE: PHMSA representative to describe state criteria for determining compliance with abandoning pipeline facilities and analyzing pipeline accidents to determine their causes) Yes = 1 No = 0	1	1
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Evaluator Notes:  
No abandonment and no accidents in 2014.

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10	Is the state aware of environmentally sensitive areas traversed by or adjacent to hazardous liquid pipelines? (reference Part 195, review of NPMS) Yes = 1 No = 0	1	1
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Evaluator Notes:  
Yes. Pipeline inside Baltimore city limits, used form EN48 for inspection in Nov. 2013.

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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 195.402(c)(5)? Yes = 1 No = 0	1	NA
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Evaluator Notes:  
No accidents or leaks in 2014.

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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
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Evaluator Notes:  
Annual reports are reviewed, once they are received, to ensure that there are no issues with the previous years. The information contained in the annual reports is then transferred to an Excel spread sheet where it is used to track trends. A table is also created for third party damages to see how the operators are progressing from year to year. (Incident/Accident reports see above.

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13	Did state input all applicable OQ, IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1 Yes = 2 No = 0 Needs Improvement = 1	2	1
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Evaluator Notes:  
IMP conducted, but not uploaded. OQ - OK.

<b>14</b>	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:

Yes. Viewed NPMS webpage to verify during the evaluation.

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<b>15</b>	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. Conducted 1 inspections in 2014.

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<b>16</b>	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
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Evaluator Notes:

Use federal form and upload protocols 1-8. Form EN32.

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

Use federal form and it ask to review program. Form 38.

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<b>18</b>	Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. 49 CFR 195.440 PAPEI Effectiveness Inspections should have been completed by December 2013 Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

The PSCED conducts PAP inspections on a three year cycle for its larger operators and reviews the PAP's of master meter and small LP operators when it reviews their records.

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

The PSCED meets with operators on a quarterly basis at the Gas Operator Advisory Committee meetings (GOAC). The PSCED also attends the monthly MD/DC Damage Prevention Committee meetings to meet with other stakeholders. All enforcement cases are available to the public through written request.

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<b>20</b>	Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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Evaluator Notes:

None in 2014.

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<b>21</b>	Did the state participate in/respond to surveys or information requests from NAPSRS or PHMSA?	1	1
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes.

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- 22** If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate.(New Question for CY2013, no points until CY2015 evaluation conducted in CY2016.) 0 0

Info Only = No Points

Evaluator Notes:

None in 2014.

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- 23** Did the state attend the National NAPS Board of Directors Meeting in CY being evaluated? (New Question for CY2014, no points first year) 0 0

Info Only = No Points

Evaluator Notes:

Not in 2014, but plans to in 2015.

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- 24** Discussion on State Program Performance Metrics found on Stakeholder Communication site ? (question will be rolled up and included as part of Question C-12 on future evaluations) <http://primis.phmsa.dot.gov/comm/states.htm> 0 0

Info Only = No Points

Evaluator Notes:

Yes. Reviewed State Program Performance Metrics found on Stakeholder Communication site.

Discussed use of site.

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- 25** General Comments: Info Only Info Only  
Info Only = No Points

Evaluator Notes:

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Total points scored for this section: 38  
Total possible points for this section: 41



# 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
- a. Procedures to notify an operator (company officer) when a noncompliance is identified Yes  No  Needs Improvement
- b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns Yes  No  Needs Improvement

Evaluator Notes:

No issues.

- 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
- a. Were compliance actions sent to company officer or manager/board director if municipal/government system? Yes  No  Needs Improvement
- b. Were probable violations documented? Yes  No  Needs Improvement
- c. Were probable violations resolved? Yes  No  Needs Improvement
- d. Was the progress of probable violations routinely reviewed? Yes  No  Needs Improvement

Evaluator Notes:

No issues.

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

Evaluator Notes:

Yes. 3 in 2014.

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

Evaluator Notes:

Yes.

- 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:

Yes. MD PSC issues 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. Issued fines in 2013 and 2014 on natural gas side of program.

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

Evaluator Notes:



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

Evaluator Notes:  
 Yes. On page 3 of the written procedures.

**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 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. Each operator has list of MD PSC contact information.

**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 NA  
 Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:  
 No accidents in 2014.

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

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

Evaluator Notes:  
 No accidents in 2014

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

Evaluator Notes:  
 No accidents in 2014.

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

Evaluator Notes:  
 No accidents in 2014.

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

Evaluator Notes:



The PSCED shares lessons learned from various incidents and or events with NAPSRS at the ER meeting and with its jurisdictional operators at the GOAC meetings.

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**8** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

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Total points scored for this section: 5  
Total possible points for this section: 5



**PART F - Damage Prevention**

**Points(MAX) Score**

- 
- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | 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?<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:  
Procedures are maintained in the file room and reviewed when conducting the comprehensive O&M review.

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- |          |   |   |   |
|----------|---|---|---|
| <b>2</b> | Did the state inspector check to assure the pipeline operator is following its written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system?<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:  
Miss Utility tickets are checked when construction or excavation activities are inspected. A review of the Utilities One Call procedures is also conducted when their O&Ms are reviewed.

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- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | 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.)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:  
The PSCED participated in GOAC meetings where these issues are addressed.

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- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | 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)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:  
The PSCED collects damage prevention data and presents the results to the operators at GOAC and individually at various meetings throughout the year.

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|----------|--|-----------|-----------|
| <b>5</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

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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:  
 Petroleum Fuel and Terminal Company  
 Name of State Inspector(s) Observed:  
 Carlos Acosta  
 Location of Inspection:  
 Baltimore  
 Date of Inspection:  
 07/08/15  
 Name of PHMSA Representative:  
 Jim Anderson

Evaluator Notes:

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

Evaluator Notes:  
 Yes. No issues.

**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.

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

Evaluator Notes:  
 Yes.

**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 NA  
 Yes = 1 No = 0

Evaluator Notes:  
 No equipment needed.

**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:  
 Yes. No issues

**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.

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- |          |   |   |   |
|----------|---|---|---|
| <b>8</b> | 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)<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Yes.

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

Evaluator Notes:

None found.

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- |           |  |           |           |
|-----------|--|-----------|-----------|
| <b>10</b> | 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<br>Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|
- a. Abandonment
  - b. Abnormal Operations
  - c. Break-Out Tanks
  - d. Compressor or Pump Stations
  - e. Change in Class Location
  - f. Casings
  - g. Cathodic Protection
  - h. Cast-iron Replacement
  - i. Damage Prevention
  - j. Deactivation
  - k. Emergency Procedures
  - l. Inspection of Right-of-Way
  - m. Line Markers
  - n. Liaison with Public Officials
  - o. Leak Surveys
  - p. MOP
  - q. MAOP
  - r. Moving Pipe
  - s. New Construction
  - t. Navigable Waterway Crossings
  - u. Odorization
  - v. Overpressure Safety Devices
  - w. Plastic Pipe Installation
  - x. Public Education
  - y. Purging
  - z. Prevention of Accidental Ignition
  - A. Repairs
  - B. Signs
  - C. Tapping
  - D. Valve Maintenance
  - E. Vault Maintenance



- F. Welding
- G. OQ - Operator Qualification
- H. Compliance Follow-up
- I. Atmospheric Corrosion
- J. Other

Evaluator Notes:

Integrity management digs and repairs.

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



**PART H - Interstate Agent State (if applicable)**

**Points(MAX) Score**

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

**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.) 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

**3** Were any probable violations identified by state referred to PHMSA for compliance? 1 NA  
(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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

