



U.S. Department  
of Transportation  
Pipeline and  
Hazardous Material  
Safety Administration

400 Seventh St. S.W.  
Washington, D.C. 20590

## 2006 Hazardous Liquid Program Evaluation Document for Washington Utilities and Transportation Commission

### Document Legend:

#### PART:

- O -- Representative Date and Title Information
- A -- General Program Compliance
- B -- Inspections(Procedures,Records,forms)
- C(1) -- Compliance 60105(a) States
- C(2) -- Compliance 60106(a) States
- C(3) -- Compliance-Interstate Agents
- D -- Accident Investigations
- E -- Field Inspection

2006 Hazardous Liquid Program Evaluation Document -- CY 2006  
(Hazardous Liquid)

State Agency: Washington

Rating:

Agency Status:

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

Agency Representative: Alan Rathbun and Dave Lykken

Date of Visit: 8/13/2007-8/17/2007

OPS Representative: Tom Finch and Rex Evans

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

Name/Title: Mr. Mark Sidran, Chairman

Agency: Washington Utilities and Transportation Commission

Address: 1300 Evergreen Park Drive SW

City/State/Zip: Olympia, Washington, 98502

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**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 2006 (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 OPS representative's judgment. A deficiency in any one part of a multiple part question should be scored as needs improvement. Circle the correct answer; then place the score in the points column. 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, delete the question and deduct the points from the total possible points. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual certification/agreement attachments provide the basis for determining the state's pipeline safety grant allocation.

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**Field Inspection PART E**

The field inspection form used will allow different areas of emphasis to be considered for each question. Questions 6, 7 and 8 are provided for scoring this portion of the field inspection. In completing PART E, the OPS representative should include a written summary which thoroughly documents the inspection.

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**PART A - General Program Compliance**

Points(MAX) Score

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

**SLR NOTES:**

Did not carry over the correct number 4 of Intrastate to be corrected as 4 in 2005 to 4 on the 2006 Certification. the good part is that they followed up on these 4 and did clear them.

<b>A.2</b>	Yes = 1 No = 0 Did the state have an adequate mechanism to track operator reporting of accidents to ensure state compliance with 60105(a) Certification/ 60106 (a) Agreement requirements (fatality, injury requiring hospitalization, property damage exceeding \$50,000)?	1	1
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**SLR NOTES:**

Yes they are checking a 2007 Yellowstone Pipeline July 24th 15 gallon spill to see why there was no NRC Report.

<b>A.3</b>	Yes = 3 No = 0 Needs Improvement = 1 Did the state take appropriate follow-up actions related to operator accident reports?	3	NA
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**SLR NOTES:**

They did not have any in 2006.

<b>A.4</b>	Yes = 2 No = 0 Needs Improvement = 1 In states requiring operators to file accident reports with state, did state forward accident reports to OPS within 10 days?	2	NA
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**SLR NOTES:**

NA didn't have any.

<b>A.5</b>	Yes = 5 No = 0 Has the state held TSI seminar(s) in the last 3 years? (NOTE: Indicate date of last seminar or if state requested seminar, but TSI could not provide, indicate date of state request for seminar)	5	5
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**SLR NOTES:**

Yes in October 25, 2005, in Seattle, WA.

<b>A.6</b>	Yes = 2 No = 0 Needs Improvement = 1 Were pipeline safety program files well organized and kept in a secure, readily accessible location?	2	2
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**SLR NOTES:**

Yes

<b>A.7</b>	Yes = 5 No = 0 Needs Improvement = 3 Did state records and discussions with the state pipeline safety program manager indicate adequate knowledge of OPS program and regulations?	5	5
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**SLR NOTES:**

Yes with Dave Lykken. Their Pipeline Safety Program Manager was only present at the beginning of this evaluation, sporadically during the evaluation, and at the end of this evaluation. Rex Evans and myself suggested that he be available for the complete evaluation next year so that discussions with the state pipeline safety program manager more accurately indicate and reflect adequate knowledge of PHMSA/OPS programs and regulations.

<b>A.8</b>	Yes = 5 No = 0 Needs Improvement = 3 Did the state encourage and promote programs to prevent damage to pipeline facilities as a consequence of demolition, excavation, tunneling, or construction activity?	5	5
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**SLR NOTES:**

Yes. Tim Sweeney is guiding them and working them on and to the 9 elements. No state agency is exempt from this but no state agency has completed authority over the state damage prevention program. Identifying and fining the repeat offenders. Investigating contract locate companies. Should go after the operator who has the the ultimate responsibility. Sweeney attends LEPC meetings.

<b>A.9</b>	Yes = 0 No = 0 Have there been modifications or proposed changes to inspector-staffing levels? If yes, describe. (Information Question)	0	NA
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**SLR NOTES:**

None in 2006 but they just hired Stephanie as a new inspector this August. She is an BIT.

<b>A.10</b>	Yes = 0 No = 0 What were the major accomplishments for the year being evaluated? Describe the accomplishments. (Information Question)	0	NA
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**SLR NOTES:**

1. Small Gas Pipeline Study:

Hired consultant to perform a study to identify system characteristics that pose risks warranting a regulatory or policy response, identify the types of small gas systems operating in Washington, and to identify the range of regulatory/policy responses for those systems.

Background:

There are other small gas systems that do not meet the federal master meter definition yet potentially pose a safety hazard. Gas pipeline systems that are publicly-owned or distribute propane gas are currently not inspected or regulated in the same manner as master meter systems. This study is intended to gather information about all small gas pipeline systems with the intention of determining whether any changes are necessary to the state's safety oversight program. This inquiry may inform a future rulemaking and could guide the commission in a request for changes in state law.

2. Public Awareness:

Assisted operators in complying with the new PA rule. Tim Sweeney our Public Outreach Coordinator attended several meetings to brief operators on the requirements of the PA rule.

3. Web Access to pipeline maps (pilot program)

4. Web access to standard and specialized inspection reports

5. One-call enforcement emphases

Seek enforcement against excavators who habitually dig before calling for locates. Currently conducting investigation regarding Third Party locating service not meeting requirement to complete locate requests 2 days prior to scheduled excavation.

<b>A.11</b>	Yes = 0 No = 0	What legislative or program initiatives are taking place/planned in the state, past, present, and future? Describe initiatives (i.e. damage prevention, jurisdiction/authority, compliance/administrative, etc.) (Information Question)	0	0
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**SLR NOTES:**

1. Senate Bill 5225 became law on July 22, 2007, the first major revision to Washington's pipeline safety act since 2001. The legislation consolidates all pipeline safety authority under one chapter of law. It clarifies the UTC's authority over pipeline safety and updates state statutes to conform to federal pipeline-safety requirements. The House and Senate passed the bill without any no votes.

In 2007 the UTC will begin rulemaking to conform its rules to the major provisions of the new law:

. Increase maximum penalties for pipeline-safety violations so they are consistent with federal law. The state maximum penalty will increase to \$100,000 for each violation a day from its current \$25,000 level. The penalty change applies to hazardous liquid and gas pipelines operating within the state.

. Define "gas" so that it will extend state pipeline-safety regulation to include hydrogen and acid-gas pipelines.

. Extend state pipeline-safety regulation over publicly owned small pipeline systems called "master meters," that are currently subject to federal pipeline safety rules. An example of a publicly owned master meter system is one owned by a public housing authority where the tenant either pays the agency directly or indirectly for the gas received.

. Allow for state pipeline-safety regulation over propane pipeline-distribution systems regardless of whether propane rates are regulated by the commission.

2. Refer to items under Question A10 (Major Accomplishment)for Program Initiatives

3. Training opportunities exceed requirements found in State program requirements

<b>A.12</b>	Yes or no response requested = 5 No = 0	Did the state respond in writing within 45 days to the requested items in the Chairman's letter following the Region's last program evaluation? (Region representative may allow 15 additional days for documented circumstances)	5	5
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**SLR NOTES:**

Yes on March 16, 2007. Ours was not sent to them until January 31, 2007.

<b>A.13</b>	Yes = 2 No = 0 Needs Improvement = 1	What actions did the State initiate as a result of issues raised in the Chairperson's letter from the previous year? Did actions correct or address deficiencies from previous year's evaluation? Describe.	2	2
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**SLR NOTES:**

Yes they addressed our three major items and had no major deficiencies in 2005 to correct.

<b>A.14</b>	Yes = 5 No = 0	Has each inspector fulfilled the 3 year TSI training requirement? If No, has the state been granted a waiver regarding TSI courses by the Associate Administrator for Pipeline Safety? (NOTE: If the State has new inspectors who have not attended all TSI courses, but are in a program which will achieve the completion of all applicable courses within 3 years of employment, or if a waiver has been granted by the Associate	5	5
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Administrator for Pipeline Safety, please answer yes.)

**SLR NOTES:**

Yes they have but now have Lex to have all completed by August 2009. Stephanie is just getting started.

**A.15** Brief Description of Non-TSI training Activities  
For State Personnel:

0

For Operators:

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

**SLR NOTES:**

Non - TSI Training Activities

For State Personnel

NTSB Courses:

Human Fatigue Factors

Al Jones  
Joe Subsits  
Kuang Chu  
Patti Johnson  
Scott Rukke

Cognitive Interviewing Techniques

Al Jones  
Joe Subsits  
Kuang Chu  
Patti Johnson  
Scott Rukke

Clarion Course:

Integrity Management Programs  
Joe Subsits

**A.16** Part A: General Comments/Regional Observations/Computer Inventory

0

**SLR NOTES:**

At present there exists a general animosity for some PHMSA state funding issues.

The WUTC's Policy and Outreach Coordinator - Tim Sweeney is a great example on a state level of what our CATS are on a national level.

Computer Inventory:

Quantity	Description	Year	Make	Model	Serial Number Tag #	Federal
1	Dell Processor		Dell		N67NXD51	TSC#98823
1 set	Speakers	Dell				
1	Samsung Flat Screen Monitor			Samsung	MY19HCHX505286	TSC#98843
1	HP PSC 2410 (All in one printer)			HP	MY41SJ36JF	TSC#98914
1	HP Scanjet Scanner 4600			HP	CN3BMB7638	TSC#98794
1	HP Scanjet Scanner		HP		CN2251606H	TSC#92227

**A.17** Did the lead inspectors complete all the required TSI OQ courses and Computer Based training before conduction OQ inspections?

0

0

**SLR NOTES:**

Yes Al Jones was the last one to complete the 299 CBTs on 02/2006.

**A.18** Did the lead inspectors complete all required IMP courses/seminars and CBT before conducting IMP inspection ?

0

**SLR NOTES:**

Yes Kuang Chu and Joe Subsits as the lead inspectors have completed the 305 course.

**A.19** What is the state doing at present concerning the " Common Ground Study" and Damage Prevention?

0

**SLR NOTES:**

Nothing on CGA , Tim Sweeney doing outreach and attending local LEPC meetings and the WUTC is taking action against operators, excavators and third party locating contractors that violate their damage prevention laws.

Total points scored for this section: 37

Total possible points for this section: 38

**PART B - Inspections(Procedures,Records,forms)**

**Points(MAX) Score**

**B.1** Yes = 5 No = 0 Needs Improvement = 1-4  
Does the State have a written inspection plan to complete the following ?

a..Standard Inspections	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Needs Improvement <input type="checkbox"/>	5	5
b..IMP Inspections	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Needs Improvement <input type="checkbox"/>		
c..OO Inspections and Training Verification	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Needs Improvement <input type="checkbox"/>		
d..Construction Inspections	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Needs Improvement <input type="checkbox"/>		
e..Other Integrity Inspections and incident investigations	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Needs Improvement <input type="checkbox"/>		

**SLR NOTES:**

Yes to all 5

**B.2** Yes = 2 No = 0 Needs Improvement = 1  
Did the written procedures for selecting operators/units adequately address key concerns?

a..Length of time since last inspection	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Needs Improvement <input type="checkbox"/>	2	2
b..History of operator/unit and/or location(including leakage, incident and compliance history)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Needs Improvement <input type="checkbox"/>		
c..Types of activity being undertaken by operator(construction etc.)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Needs Improvement <input type="checkbox"/>		
d..For large operators, rotation of locations inspected	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Needs Improvement <input type="checkbox"/>		

**SLR NOTES:**

Yes

**B.3** Yes = 2 No = 0 Needs Improvement = 1  
Did the state inspect units in accordance with time intervals established in its written procedures?

		2	1
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**SLR NOTES:**

No they did not. They need to change their procedures. They are changing their procedures.

**B.4** Yes = 2 No = 0 Needs Improvement = 1  
Did the state maintain detailed records to sufficiently back up the types of inspection conducted and person-days devoted to inspections?

		2	2
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**SLR NOTES:**

Yes.

**B.5** Yes = 4 No = 0 Needs Improvement = 1-3  
Do state inspection forms cover all code requirements addressed on federal inspection forms?

		4	4
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**SLR NOTES:**

Yes

**B.6** Yes = 4 No = 0 Needs Improvement = 1-3  
Did state complete all portions of all forms?

		4	4
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**SLR NOTES:**

Yes

**B.7** Yes = 2 No = 0 Needs Improvement = 1  
Did the state initiate appropriate follow-up actions related to Safety Related Condition Reports?

		2	NA
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**SLR NOTES:**

Na none on liquids.

**B.8** Yes = 2 No = 0 Needs Improvement = 1  
Did the state review operator procedures for determining areas of active corrosion on liquid lines in sufficient detail? (NOTE: OPS representative to describe state criteria for determining areas of active corrosion.)

		2	2
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**SLR NOTES:**

This is already on the checklist that they have completed.

**B.9** Yes = 1 No = 0  
Did the state adequately review for compliance operator procedures for abandoning pipeline facilities and analyzing pipeline accidents to determine their causes? (NOTE: OPS representative to describe state criteria for determining compliance with abandoning pipeline facilities and analyzing pipeline accidents to determine their causes.)

		1	1
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**SLR NOTES:**

Yes per the checklist.

**B.10** Yes = 2 No = 0 Needs Improvement = 1  
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 into nearby buildings? Refer to April 12, 2001 OPS response to NTSB Recommendations P-00-20 and P-00-21.

		2	2
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**SLR NOTES:**

Why is this in the liquids evaluation? Actually: NA.

<b>B.11</b>	Yes = 2 No = 0 Needs Improvement = 1 Did the state review records of previous accident investigations, including reported third party damage and leak response to ensure appropriate operator response as required by Part 195.402e?	2	2
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**SLR NOTES:**

Yes per checklist.

<b>B.12</b>	Yes = 2 No = 0 Needs Improvement = 1 Has the state reviewed underground directional drilling/boring procedures of each operator and their contractors to determine if they include effective actions to protect their underground facilities from the dangers posed by directional drilling and other trenchless technologies? These procedures should include, but are not limited to, accurately locating underground piping and reviewing the qualifications of personnel performing the work.	2	2
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**SLR NOTES:**

Yes per the Advisory Bulletin it should be on the inspection checklist. Dave will remind his inspectors to ask this.

<b>B.13</b>	Yes = 3 No = 0 Needs Improvement = 1 Did the state adequately document sufficient information for probable violations?	3	3
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**SLR NOTES:**

Yes on the Valero Inspection by Joe Subits.

<b>B.14</b>	No = 0 Yes = 5 Was the ratio acceptable of total inspection person-days to total person-days charged to the program by state inspectors? (Regional Director may adjust points for just cause.) A.Total Inspection Person Days (Attachment 2)= 64	5	5
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B.Total Inspection Person Days Charged to the program(220 X Number of Inspection person years(Attachment 7)=147.4

Formula:- Score = A/B = 64/147.4 = 0.43

Rule:- (If score >= .38 then points = 5 else Points = 0.) Thus Points = 5

**SLR NOTES:**

Yes = 0.43

<b>B.15</b>	Yes = 5 No = 0 Has the state made an attempt to identify and assess environmentally sensitive areas traversed by or adjacent to hazardous liquid pipelines?	5	5
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**SLR NOTES:**

Yes with their GIS system.

<b>B.16</b>	Did the State use the Federal Protocols to conduct the IMP Inspections? If the State used an alternative Inspection form please provide information regarding alternative form.	0	
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**SLR NOTES:**

Yes they use our form.

<b>B.17</b>	Part B: General Comments/Regional Observations	0	
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**SLR NOTES:**

Dave Lykken is their center and does a lot of their work.

<b>B.18</b>	Did the State input all operator qualification inspection results into web based database provided by PHMSA in a timely manner upon completion of OQ inspections ?	0	
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**SLR NOTES:**

Yes Me and John Haddow just checked all of the states about one month ago.

<b>B.19</b>	Did the State submit their replies into Integrity Management Database (IMDB) in response to the Operators notifications for their integrity management program ?	0	
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**SLR NOTES:**

Yes because our Huy Nguyen has checked on this.

<b>B.20</b>	Has the Federal Protocol form been uploaded to the Integrity Management Database(IMDB)?	0	
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**SLR NOTES:**

Yes we have checked the database.

Total points scored for this section: 40  
Total possible points for this section: 41

**PARTC(1) - Compliance 60105(a) States**

**Points(MAX) Score**

**C(1).1** Yes = 2 No = 0 Needs Improvement = 1  
 Does the state have written procedures or a mechanism for notifying an operator when a noncompliance is identified as specified in the "Guidelines for States Participating in the Pipeline Safety Program", Chapter 5? 2 2

**SLR NOTES:**  
 Yes under standard inspection and correspondence tab.

**C(1).2** Yes = 2 No = 0 Needs Improvement = 1  
 Does the state have a written procedure or mechanism for routinely reviewing the progress of compliance actions to prevent delays or breakdowns of the enforcement process, as required by the "Guidelines for States Participating in the Pipeline Safety Program", Chapter 5? 2 2

**SLR NOTES:**  
 Yes

**C(1).3** Yes = 4 No = 0 Needs Improvement = 1-3  
 Did the State issue any compliance orders, warning letters, or the equivalent on new or repeat violations; were letters(s) submitted within the time frame established by the procedures required by the "Guidelines for States Participating in the Pipeline Safety Program", Chapter 5; and adequately communicate those probable violations discovered? 4 4

**SLR NOTES:**  
 Yes on Valero and the turnaround was within the sixty days.

**C(1).4** Yes = 2 No = 0 Needs Improvement = 1  
 Did the state follow its written procedures or a mechanism in Question 3 for reviewing compliance actions and follow-up to determine that prompt corrective actions were taken by operators, within the time frames established by the procedures and compliance correspondence, as required by the "Guidelines for States Participating in the Pipeline Safety Program", Chapter 5? 2 2

**SLR NOTES:**  
 Yes on Valero and the turnaround was within the sixty days.

**C(1).5** Yes = 0 No = 0  
 If compliance could not be established by other means, did state pipeline safety program staff request formal action, such as a "Show Cause Hearing" to correct pipeline safety violations? (Information Question) 0 NA

**SLR NOTES:**  
 NA no "Show Cause Hearing" in 2006.

**C(1).6** Yes = 2 No = 0  
 Did the state adequately document the resolution of probable violations? 2 2

**SLR NOTES:**  
 Yes on the Valero NOA.

**C(1).7** Yes = 1 No = 0  
 Were compliance actions sent to a company officer (manager or board member if municipal/government system)? 1 1

**SLR NOTES:**  
 Yes to the VP of Valero.

**C(1).8** Yes = 2 No = 0 Needs Improvement = 1  
 Did the compliance proceedings give reasonable due process to all parties? 2 2

**SLR NOTES:**  
 Yes

**C(1).9** Part C(1): General Comments/Regional Observations 0

**SLR NOTES:**  
 Procedures need to be updated on the inspection intervals.

**C(1).10** Yes = 0 No = 0 Needs Improvement = 0  
 Did the State issue any compliance actions in the last 3 years?(Note : PHMSA representative has discretion to delete questions or adjust points, as appropriate, based on number of probable violations; any change requires written explanation) 0 0

**SLR NOTES:**  
 Yes.

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

**PARTC(2) - Compliance 60106(a) States**

**Points(MAX) Score**

C(2).1	Yes = 2 No = 0 Needs Improvement = 1 Did the state use an inspection form, approved by the Regional Director, covering applicable regulations in sufficient detail?	2	NA
C(2).2	Yes = 2 No = 0 Needs Improvement = 1 Are results adequately documented demonstrating inspection units were reviewed in accordance with state inspection plan?	2	NA
C(2).3	Yes = 5 No = 0 Needs Improvement = 2 Were any cases referred to OPS for compliance in the last 3 years? (NOTE: OPS representative has discretion to delete question or adjust points as appropriate, based on number of probable violations; any change requires written explanation.)	5	NA
C(2).4	Yes = 2 No = 0 Needs Improvement = 1 Does the State have a written Inspection Plan to conduct Integrity Management Inspections?	2	NA
C(2).5	Yes = 2 No = 0 Needs Improvement = 1 Did the state immediately report to OPS conditions which may pose an imminent safety hazard to the public or to the environment?	2	NA
C(2).6	Yes = 5 No = 0 Needs Improvement = 2 Did the State use the Federal Protocols to conduct the IMP Inspections? If the State used an alternative inspection form please provide information regarding alternative form.(New Question)	5	NA
C(2).7	Part C(2): General Comments/Regional Observations	0	

**SLR NOTES:**

NA

**PARTC(3) - Compliance-Interstate Agents**

**Points(MAX)      Score**

<b>C(3).1</b>	Yes = 2 No = 0 Needs Improvement = 1 Are results adequately documented demonstrating inspection units were reviewed in accordance with "OPS directed inspection" plan?	2	2
<b>SLR NOTES:</b> Yes they did.			
<b>C(3).2</b>	Yes = 2 No = 0 Needs Improvement = 1 Did the state submit documentation of the inspections within 45 days, as stated in its latest Interstate Agent Agreement form?	2	2
<b>SLR NOTES:</b> Yes they do it within 30 days.			
<b>C(3).3</b>	Yes = 5 No = 0 Needs Improvement = 2 Were any cases referred to OPS for compliance in the last 3 years? (NOTE: OPS representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.)	5	5
<b>SLR NOTES:</b> Yes to Terasen from September 19, 2005.			
<b>C(3).4</b>	Yes = 2 No = 0 Needs Improvement = 1 Did the state immediately report to OPS conditions which may pose an imminent safety hazard to the public or to the environment?	2	NA
<b>SLR NOTES:</b> NA none in 2006.			
<b>C(3).5</b>	Yes = 2 No = 0 Needs Improvement = 1 Did the state give written notice to OPS within 45 days of all probable violations found?	2	NA
<b>SLR NOTES:</b> NA in 2006 for liquids.			
<b>C(3).6</b>	Yes = 5 No = 0 Needs Improvement = 2 Did the state initially submit adequate documentation, on report format approved by Regional Director, to support compliance action by OPS on probable violations?	5	NA
<b>SLR NOTES:</b> NA none in 2006.			
<b>C(3).7</b>	Part C(3): General Comments/Regional Observations	0	
<b>SLR NOTES:</b>			

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

# PART D -Accident Investigations

Points(MAX) Score

**D.1** Yes = 2 No = 0 Needs Improvement = 1  
 Are state personnel following the procedures for Federal/state cooperation in case of an accident (Appendix C in "Guidelines for States Participating in the Pipeline Safety Program")? 2 NA

**SLR NOTES:**  
 NA none in 2006.

**D.2** Yes = 2 No = 0 Needs Improvement = 1  
 Are state personnel familiar with the jurisdictional authority and Memorandum of Understanding (Appendix B in "Guidelines for States Participating in the Pipeline Safety Program") between NTSB and OPS? 2 2

**SLR NOTES:**  
 Yes Stephanie Zuehlke answered that NTSB would take over.

**D.3** Yes = 2 No = 0 Needs Improvement = 1  
 Did the state keep adequate records of accident notifications received? 2 2

**SLR NOTES:**  
 Yes per their database and print out on Yellowstone (ConocoPhillips) July 24th, 2007 accident notification.

**D.4** Yes = 2 No = 0 Needs Improvement = 1  
 If an onsite investigation of an accident was not made, did the state obtain sufficient information by other means to determine the facts and support the decision not to go on-site? 2 NA

**SLR NOTES:**  
 NA no liquid accidents in 2006.

**D.5** Yes = 5 No = 0  
 Were investigations thorough and conclusions and recommendations documented in an acceptable manner? 5 NA

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

**SLR NOTES:**  
 NA - none in 2006.

**D.6** Yes = 3 No = 0 Needs Improvement = 1  
 Did the state follow-up on any violations found during an accident investigation? 3 NA

**SLR NOTES:**  
 NA - none in 2006.

**D.7** Part D: General Comments/Regional Observations 0

**D.8** Yes = 0 No = 0 Needs Improvement = 0  
 Did the state take appropriate follow-up actions related to Operator accident reports? 0 NA

**SLR NOTES:**  
 NA

**D.9** Yes = 0 No = 0 Needs Improvement = 0  
 did the state work with PHMSA to ensure that incident/accident reports are accurate and updated? 0 NA

**SLR NOTES:**  
 NA none in 2006.

Total points scored for this section: 4  
 Total possible points for this section: 4

**PART E -Field Inspection**

**Points(MAX) Score**

**E.1** Operator,Inspector,Location,Date,OPS Representative Information  
 Name of Operator Inspected:  
 BP Pipelines (North America), Inc.  
 Name of State Inspector(s) Observed:  
 Joe Subits  
 Location of Inspection:  
 Bellingham, WA  
 Date of Inspection:  
 August 27 - 31, 2007  
 Name of Operator Inspected:  
 Jerry Kenerson

0

**SLR NOTES:**

Ferndale (gas) and Cherry Point (liquid) systems, plus one direct sales lateral were inspected.

**E.2** Yes = 2 No = 0  
 Did the inspector use an acceptable inspection form/checklist?

2

2

**SLR NOTES:**

The inspector used the Standard Inspection Checklist, 2007 Version.

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

2

2

**SLR NOTES:**

Thorough documentation was completed by the inspector.

**E.4** Yes = 1 No = 0  
 Is the inspector using the inspection form/checklist as a guide for the inspection?

1

1

**SLR NOTES:**

The inspector used the inspection checklist as a guide throughout the entire inspection process.

**E.5** Yes = 1 No = 0  
 Has the state incorporated new regulations into the inspection form/checklist?

1

1

**SLR NOTES:**

WUTC has incorporated a large number of supplemental (State) regulations to the Federal Standard Inspection Checklist.

**E.6** Yes = 2 No = 0 Needs Improvement = 1  
 Did the inspector check to assure the operator is following its written procedures for (check all that

2

2

- apply):
- a..Abandonment
  - b..Abnormal operations
  - c..Break-Out Tanks
  - d..Casings
  - e..Compressor or Pump Stations
  - f..Cathodic Protection
  - g..Damage Prevention
  - h..Deactivation
  - i..Emergency Procedures
  - j..Inspection of Line Markers
  - k..Inspection of Right-of-Way
  - l..Inspection of Change in Class Location
  - m..Liaison with Public Officials
  - n..Leak Surveys
  - o..MOP
  - p..MAOP
  - q..Moving Pipe
  - r..Navigable Waterway Crossings
  - s..New Construction
  - t..Overpressure safety devices
  - u..Prevention of Accidental ignition
  - v..Public Education
  - w..Purging

- x..Repairs
- y..Signs
- z..Tapping
- A..Valve Maintenance
- B..Vault Maintenance
- C..Welding

**SLR NOTES:**

Items not checked are not applicable to the operator's operation.

- E.7** Yes = 2 No = 0 Needs Improvement = 1  
 Did the inspector assure the operator's procedures are adequate for(check all that apply): 2 2
- a..Abandonment
  - b..Abnormal operations
  - c..Break-Out Tanks
  - d..Casings
  - e..Compressor or Pump Stations
  - f..Cathodic Protection
  - g..Damage Prevention
  - h..Deactivation
  - i..Emergency Procedures
  - j..Inspection of Line Markers
  - k..Inspection of Right-of-Way
  - l..Inspection of Change in Class Location
  - m..Liaison with Public Officials
  - n..Leak Surveys
  - o..MOP
  - p..MAOP
  - q..Moving Pipe
  - r..Navigable Waterway Crossings
  - s..New Construction
  - t..Overpressure safety devices
  - u..Prevention of Accidental ignition
  - v..Public Education
  - w..Purging
  - x..Repairs
  - y..Signs
  - z..Tapping
  - A..Valve Maintenance
  - B..Vault Maintenance
  - C..Welding

**SLR NOTES:**

Items not checked are not applicable to operations, and are not covered in the operator's O and M.

- E.8** Yes = 2 No = 0 Needs Improvement = 1  
 Did the inspector check to assure the operator's records verify code and procedures are followed(check all that apply): 2 2
- a..Abandonment
  - b..Abnormal operations
  - c..Break-Out Tanks
  - d..Casings
  - e..Compressor or Pump Stations
  - f..Cathodic Protection
  - g..Damage Prevention
  - h..Deactivation
  - i..Emergency Procedures
  - j..Inspection of Line Markers
  - k..Inspection of Right-of-Way
  - l..Inspection of Change in Class Location

m..Liaison with Public Officials	<input checked="" type="checkbox"/>
n..Leak Surveys	<input checked="" type="checkbox"/>
o..MOP	<input checked="" type="checkbox"/>
p..MAOP	<input type="checkbox"/>
q..Moving Pipe	<input checked="" type="checkbox"/>
r..Navigable Waterway Crossings	<input type="checkbox"/>
s..New Construction	<input checked="" type="checkbox"/>
t..Overpressure safety devices	<input checked="" type="checkbox"/>
u..Prevention of Accidental ignition	<input checked="" type="checkbox"/>
v..Public Education	<input checked="" type="checkbox"/>
w..Purging	<input checked="" type="checkbox"/>
x..Repairs	<input checked="" type="checkbox"/>
y..Signs	<input checked="" type="checkbox"/>
z..Tapping	<input checked="" type="checkbox"/>
A.. Valve Maintenance	<input checked="" type="checkbox"/>
B.. Vault Maintenance	<input type="checkbox"/>
C..Welding	<input checked="" type="checkbox"/>

**SLR NOTES:**

Items not checked are not applicable to this operator.

**E.9** Yes = 2 No = 0  
Did the inspector have adequate knowledge of the pipeline safety program goals and regulations? 2 2

**SLR NOTES:**

The inspector's demonstrated knowledge of the pipeline safety program goals and regulations is superior.

**E.10** Yes = 0 No = 0  
What is the inspector observing in the field? Review the summary 0 0

**SLR NOTES:**

The inspector's areas of focus in the field were general, but comprehensive. He showed special interests in operator qualification (OQ) performance, regulator compliance, acceptable cathodic protection readings (especially at riser locations and high voltage interference affecting the 6-inch line near the Intalco Aluminum facility), valve condition, assurance that pre-tested pipe was marked in compliance with Code requirements, atmospheric oxidation, and station security.

**E.11** Yes = 1 No = 0  
Did the inspector conduct an exit interview? 1 1

**SLR NOTES:**

The exit interview emphasized OandM procedures that need to be revised or clarified, and records that were incomplete or missing.

**E.12** Yes = 1 No = 0  
During the exit interview, did the inspector identify probable violations found during the inspection? 1 1

**SLR NOTES:**

The inspector identified the following probable violations found during the inspection: 195.403(a) - Emergency training program (records); 195.403(c) - Supervisor's emergency response training; WAC 480-73-200 - Surge analysis; and, 195.589(c)/579(a) - Corrosive effect of product on the pipeline.

**E.13** Part E: Summary of Comments (written Summary Required; Attach sheets as necessary) 0

**SLR NOTES:**

The inspector was thorough in an examination of the operator's records to support its pipeline safety program. During the inspection, the inspector consistently compared documented records to the operator's OandM procedures. The field audit was methodical and comprehensive, focusing on regulator operations, cathodic protection, and Operator Qualification. Mr. Subits is one of the most thorough and inquisitive field inspectors that I have ever observed. He methodically checks the operational details of facility operational systems. 10 individual field sites were inspected, including primary and satellite sites. These were evenly spread within and around the city of Bellingham, as well as several remote sites. Special attention was given to cathodic protection and regulator set points versus actual operating pressure. Areas of concerns included the operator's emergency training program, emergency response training, surge analysis, and records maintenance that shows the corrosive effect of crude products on the pipeline. In addition, the inspector held a firm knowledge of the Code, and showed courtesy in response to queries from the operator during the inspection process.

Total points scored for this section: 16  
Total possible points for this section: 16

Rating

Washington

Program Type: 60105

<b>PART</b>		<b>Possible Points</b>	<b>Points Scored</b>
O	Representative Date and Title Information		
A	General Program Compliance	38	37
B	Inspections(Procedures,Records,forms)	41	40
C(1)	Compliance 60105(a) States	15	15
C(2)	Compliance 60106(a) States		
C(3)	Compliance-Interstate Agents	9	9
D	Accident Investigations	4	4
E	Field Inspection	16	16
<b>TOTAL</b>		<b>123</b>	<b>121</b>
<b>State Rating</b>			<b>98</b>

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**Program Evaluation SLR Comments**

