



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

1200 New Jersey Avenue SE
Washington DC 20590

2008 Hazardous Liquid State Program Evaluation

for

Washington Utilities and Transportation Commission

Document Legend

PART:

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



2008 Hazardous Liquid State Program Evaluation -- CY 2008
Hazardous Liquid

State Agency: Washington
Agency Status:
Date of Visit: 04/20/2009 - 04/24/2009
Agency Representative: Anne Soiza and David Lykken
PHMSA Representative: Tom Finch
Commission Chairman to whom follow up letter is to be sent:
Name/Title: Mr. Jeff Goltz, Chairman
Agency: WUTC
Address: 1300 S. Evergreen Park Drive SW
City/State/Zip: Olympia, WA 98504

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 2008 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. A deficiency in any one part of a multiple part question should be scored as needs improvement. Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual certification/agreement attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART F):

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

Scoring Summary

PARTS	Possible Points	Points Scored
A General Program Qualifications	26	26
B Inspections and Compliance - Procedures/Records/Performance	23.5	23
C Interstate Agent States	6	6
D Incident Investigations	7	7
E Damage Prevention Initiatives	8	7
F Field Inspection	12	12
G PHMSA Initiatives - Strategic Plan	9.5	9
H Miscellaneous	3	3
I Program Initiatives	9	9
TOTALS	104	102
State Rating		98



PART A - General Program Qualifications

Points(MAX) Score

1	<p>Did the state submit complete and accurate information on the attachments to its most current 60105(a) Certification/60106 (a) Agreement? (NOTE: PHMSA Representative to verify certification/agreement attachments by reviewing appropriate state documentation. Score a deficiency in any one area as "needs improvement". Attachment numbers appear in parenthesis) Previous Question A.1, Items a-h worth 1 point each</p> <p>Yes = 8 No = 0 Needs Minor Improvement = 3-7 Needs Major Improvement = 2</p> <ul style="list-style-type: none"> a. State Jurisdiction and agent status over Hazardous Liquid and CO2 facilities (1) <input checked="" type="checkbox"/> 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"/> b. Total state inspection activity (2) <input checked="" type="checkbox"/> c. Hazardous Liquid facilities subject to state safety jurisdiction (3) <input checked="" type="checkbox"/> c. Hazardous Liquid facilities subject to state safety jurisdiction (3) <input checked="" type="checkbox"/> d. Hazardous Liquid pipeline incidents (4) <input checked="" type="checkbox"/> d. Hazardous Liquid pipeline incidents (4) <input checked="" type="checkbox"/> e. State compliance actions (5) <input checked="" type="checkbox"/> e. State compliance actions (5) <input checked="" type="checkbox"/> f. State record maintenance and reporting (6) <input checked="" type="checkbox"/> f. State record maintenance and reporting (6) <input checked="" type="checkbox"/> g. State employees directly involved in the Hazardous Liquid pipeline safety program (7) <input checked="" type="checkbox"/> g. State employees directly involved in the Hazardous Liquid pipeline safety program (7) <input checked="" type="checkbox"/> h. State compliance with Federal requirements (8) <input checked="" type="checkbox"/> h. State compliance with Federal requirements (8) <input checked="" type="checkbox"/> 	8	8
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SLR Notes:

Part 199 Amendment 24 had not been adopted yet but will be in 2009.

2	<p>Did the state have an adequate mechanism to receive operator reporting of incidents to ensure state compliance with 60105(a) Certification/60106(a) Agreement requirements (accident criteria as referenced in 195.50? (Chapter 6) Previous Question A.2</p> <p>Yes = 1 No = 0</p>	1	1
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SLR Notes:

Yes via their 1-888-321-9146. Then they track through their incident database computer and then print a hard copy.

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

Yes May 13-15, 2008 both liquids and gas seminar held in Seattle.

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

Yes in their I Drive and in their records center.

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

So far through day one 4/20/09.

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

SLR Notes:

No response necessary so yes. Maybe the WR should point items of the evaluation out in the letter the chairman.

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

SLR Notes:

None necessary.

Personnel and Qualifications

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

SLR Notes:

Lex Vinsel will take the PL 00257 Compliance course July 20th -24th this year. Lex was on the wait list for at least one year.

Stephanie Zelke is on track to complete all of her courses within the 3 years.

9	Brief Description of Non-T&Q training Activities	Info Only	Info Only
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Info Only = No Points

For State Personnel:
Scott Rukke attended a 4 day Clairon technical training course on SCC in Houston, TX.

For Operators:
Only the T&Q

For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:
Just the Safepipelines Committee.

SLR Notes:

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

SLR Notes:

Yes all inspectors have taken the required T&Q OQ courses and Computer Based Training (CBT) before conducting OQ Inspections.

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

SLR Notes:

Yes Dave, Al, Joe, and Kuang do the Liquid IMP and have completed the T&Q Integrity Management (IMP) Courses/Seminars and CBT before conducting IMP Inspections.

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

A. Total Inspection Person Days (Attachment 2):
54.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 0.49 = 107.80

Ratio: A / B
54.00 / 107.80 = 0.50



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

Points = 5

SLR Notes:

Yes

- 13** Have there been modifications or proposed changes to inspector-staffing levels? (If yes, describe) Previous Info Only Info Only
Question B.13
Info Only = No Points

SLR Notes:

In April 2008 Anne Soiza came on as their new Pipeline Safety Director. In June 2008 Alan Lundeen came on board the Policy and Outreach Manager.

- 14** Part-A General Comments/Regional Observations/Computer Inventory Info Only Info Only
Info Only = No Points

SLR Notes:

The federal computer inventory has been spread out amongst the WUTC office. The actual desktop CPU was shipped back to Carrie Brown at Volpe on September 10th last year (2008). No computer inventory this year as all old computer equipment has been written off by PHMSA.

Total points scored for this section: 26
Total possible points for this section: 26



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

Points(MAX) Score

Inspection Procedures

1	Does the State have a written inspection plan to complete the following? (all types of operators) (Chapter 5.1) Previous Question B.1 + Chapter 5 Changes Yes = 6.5 No = 0 Needs Improvement = 50% Deduction	6.5	6
a	Standard Inspections (Including LNG) (Max points = 2)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
a	Standard Inspections (Including LNG) (Max points = 2)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
b	IMP Inspections (Including DIMP) (Max points = .5)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
b	IMP Inspections (Including DIMP) (Max points = .5)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
c	OQ Inspections (Max points = .5)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
c	OQ Inspections (Max points = .5)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
d	Damage Prevention (Max points = .5)	Yes <input type="radio"/>	No <input type="radio"/> Needs Improvement <input checked="" type="radio"/>
d	Damage Prevention (Max points = .5)	Yes <input type="radio"/>	No <input type="radio"/> Needs Improvement <input checked="" type="radio"/>
e	On-Site Operator Training (Max points = .5)	Yes <input type="radio"/>	No <input type="radio"/> Needs Improvement <input checked="" type="radio"/>
e	On-Site Operator Training (Max points = .5)	Yes <input type="radio"/>	No <input type="radio"/> Needs Improvement <input checked="" type="radio"/>
f	Construction Inspections (Max points = .5)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
g	Incident/Accident Investigations (Max points = 1)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
h	Compliance Follow-up (Max points = 1)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>

SLR Notes:

Why is "(Including LNG)" on the liquid form? Why is "Including DIMP" on this liquid form?
d. & e. Yes they do it as part of their Standard Inspections. They just need to beef up stating it in their procedures. Training is stated in their Safety Division Manual just need to drill down to pipeline specific training.

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

SLR Notes:

Yes in their risk based inspection procedures. Rotation of locations is referenced to using the last inspection spread sheet - just need to reference where that is.

Inspection Performance

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

Yes per our IA Plan and per their risk based plan.

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

SLR Notes:

Yes because they use our federal inspection forms.

5 Did state complete all applicable portions of inspection forms? (Chapter 5.1 (3)) Previous Question B.6 1 1

Yes = 1 No = 0

SLR Notes:

Yes and they do a good job of picture documentation for NOPVs.

6 Did the state initiate appropriate follow-up actions to Safety Related Condition Reports? (Chapter 6.3) Previous Question B.7 .5 NA

Yes = .5 No = 0

SLR Notes:

None in 2008.

7 Did the state review operator procedures for determining areas of active corrosion on liquid lines in sufficient detail? (NOTE: PHMSA representative to describe state criteria for determining areas of active corrosion) Previous Question B.8 .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes their criteria is the same as what is on our federal inspection checklist. Questions for parts 226. thru 228.

8 Did the state adequately review for compliance operator procedures for abandoning pipeline facilities and analyzing pipeline accidents to determine their causes? (NOTE: PHMSA representative to describe state criteria for determining compliance with abandoning pipeline facilities and analyzing pipeline accidents to determine their causes) Previous Question B.9 .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes for the ExxonMobile accident in November 2008.

9 Is the state aware of environmentally sensitive areas traversed by or adjacent to hazardous liquid pipelines? (reference Part 195, review of NPMS) Previous Question B.16 .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes per their GIS mapping system maintained by their IT section (Dave Cullom).

10 Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 195.402(e)? Previous Question B.11 1 1

Yes = 1 No = 0

SLR Notes:

Yes per the inspection forms I checked where they had checked .402(e)(9).

Compliance - 60105(a) States

11 Did the state adequately document sufficient information on probable violations? (Chapter 5.2) Previous Question B.13 1 1

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

Yes by copies and pictures for Tidewater and NuStar.

12 Does the state have written procedures to identify the steps to be taken from the discovery to the resolution of a probable violation as specified in the "Guidelines for State Participating in the Pipeline Safety Program"? (Chapter 5.1) Previous Question C(1).1 1 1

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

Yes in their Safety and Consumer Division Compliance and Enforcement Manual.



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

Yes in their Intrastate Post Inspection Procedures and their associated flow chart.

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

Yes per their Commission Project tracking system. They need to better reference that and where they have this "Commission Project tracking system" in their procedures.

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

Yes per Tidewater and NuStar compliance actions for all probable violations discovered during their 2008 standard plus drug and alcohol inspections.

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

The written procedures need work but they did review compliance actions and follow-up to ensure operator prompt corrective actions were taken.

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

No show cause hearings were necessary in 2008.

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

Yes for the two Intrastate operators that they cited in 2008.

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

Yes per the letters that were sent to NuStar and Tidewater.

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

Yes in their Consumer Protection Division Compliance and Enforcement Manual.

Compliance - 60106(a) States

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

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

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

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

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

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

27	Part B: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only
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SLR Notes:

Total points scored for this section: 23
Total possible points for this section: 23.5



PART C - Interstate Agent States

Points(MAX) Score

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

SLR Notes:

Yes they use all of our most current federal forms.

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

SLR Notes:

Yes they documented that they were reviewed and I documented them in our SMART database per the information they forward to me.

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

SLR Notes:

Yes they actually submitted documentation within 30 days.

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

SLR Notes:

Yes the ExxonMobile probable violations were referred to us.

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

SLR Notes:

No imminent safety hazards in 2008.

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

SLR Notes:

Yes they actually submitted written (e-mail) notices within 30 days.

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

SLR Notes:

Yes they submitted documentation and the completed federal Violation Report.

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

SLR Notes:

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



PART D - Incident Investigations

Points(MAX) Score

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

SLR Notes:

Yes they are and were following the procedures when the ExxonMobile accident occurred.

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

SLR Notes:

Yes Joe Subsits and Marina answered this question.

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

SLR Notes:

Yes for their federal liquid reportables and many for the state liquid reportables.

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

SLR Notes:

They did not go onsite at the BP pump station spill because was just barely reportable at five gallons and it was contained on site.

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

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

SLR Notes:

Yes the investigation of the ExxonMobile was thorough and conclusions and recommendations documented in an acceptable manner. Good documentation concerning ExxonMobile's lack of procedures. This documentation resulted in a \$100,000 Civil Penalty.

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

SLR Notes:

The state initiated a Violation Report for the Exxon Mobile Interstate accident. They did not have any intrastate accidents.

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

SLR Notes:

Yes they have always followed up within 10 days concerning any accident or any 7100 form we have requested follow up on.

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

SLR Notes:



Total points scored for this section: 7
Total possible points for this section: 7



PART E - Damage Prevention Initiatives

Points(MAX) Score

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

SLR Notes:

This is not a federal inspection checklist question on our abbreviated short or long inspection form.

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

SLR Notes:

Yes per our federal inspection form and per reports that the WUTC has mandated that the operator submit.

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

SLR Notes:

Yes their new Policy and Outreach Manager is continuing the work of his predecessor in promoting the adoption of the Common Ground Alliance Best Practices document to its regulated companies as a means of damage prevention & mitigation.

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

SLR Notes:

They just started organizing to collect the data in late 2008 and have purchased the Virtual Dirt Program from CGA. They should have at least 0.5 points = NI for starting to collect this data so I am making it a NA because I can not give a NI.

- | | | | |
|----------|---|---|---|
| 5 | Did the state review operators' records of accidents and failures due to excavation damage to ensure causes of failure are addressed to minimize the possibility of recurrence as required by 195.52(b)(6)?
Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

195.52(b)(6) must include the following information: All significant facts known by the operator that are relevant to the cause of failure or extent of the damages - not just excavation damage. The WUTC checks for this on their accident and failure report forms. They had no record of accidents and failures due to excavation damage for liquids but had relevant causes.

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

SLR Notes:

Total points scored for this section: 7
Total possible points for this section: 8



PART F - Field Inspection

Points(MAX) Score

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

Name of Operator Inspected:
 BP Olympic Pipe Line Company
 Name of State Inspector(s) Observed:
 Kuang Chu
 Location of Inspection:
 The field inspection included Renton , Wa Records and Olympia Pump Station
 Date of Inspection:
 5/11 - 5/15/2009
 Name of PHMSA Representative:
 Tom Finch by Peer Reviewing the Inspection Forms and PIM

SLR Notes:

I did not have time to be physically present during this inspection. I have evaluated all of the different WUTC Engineers and Inspectors in my previous seven (7) years of annual performance field evaluations.

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

SLR Notes:

Yes

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

SLR Notes:

Yes per what was sent to me to peer review.

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

SLR Notes:

Yes per what i peer reviewed.

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

SLR Notes:

Yes when he performed the field OQ portion of his inspection.

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

SLR Notes:

The inspection conducted was a Standard Inspection.

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

- a. Procedures
- b. Records
- c. Field Activities/Facilities
- d. Other (Please Comment)

SLR Notes:



Yes the inspector adequately reviewed abbreviated, new updated procedures, records, and field, including a field OQ.

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

SLR Notes:
Yes

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

SLR Notes:
Yes

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

SLR Notes:
Yes

During the field inspection, it was noticed that the markings on pre-pressure tested pipe kept at the Tacoma Pump Station were hardly legible. Some sections of the right-of-way near Jackson Highway need tree trimming to enable the fly-over pilot to have an unobstructed view of the right-of-way. The operator indicated at the exit interview meeting that both issues would be resolved.

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

SLR Notes:

The 14" mainline was inspected from the Renton Pump Station to the Columbia River. The Tacoma Junction, Tacoma Pump Station, Olympia Pump Station, Castle Rock Pump Station, and Vancouver Junction were inspected. The field inspection also included cathodic protection test stations, rectifiers, road crossing casings, and exposed pipe at Centralia Power Plant canal in Nisqually. Almost all mainline block valve stations were inspected and several manual valves were partially operated.

During the field inspection, it was noticed that the markings on pre-pressure tested pipe kept at the Tacoma Pump Station were hardly legible. Some sections of the right-of-way near Jackson Highway need tree trimming to enable the fly-over pilot to have an unobstructed view of the right-of-way. The operator indicated at the exit interview meeting that both issues would be resolved.

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

SLR Notes:

None at this time.

13 Field Observation Areas Observed (check all that apply) 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
- 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. Other

SLR Notes:

14 Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

- Forms completed during this inspection and peer reviewed by me later.
- Abbreviated Procedures-Form 3 Standard Liquid Inspection
- Field Data Collection Form
- OQ Form 15 Field Inspection Protocol
- PHMSA Form 19 Liquid IMP Field Verification

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



Risk base Inspections - Targeting High Risk Areas

1 Does state have process to identify high risk inspection units? 1.5 1.5
 Yes = 1.5 No = 0
 Risk Factors (criteria) to consider may include:
 Miles of HCA's, Geographic area, Population Density
 Length of time since last inspection
 History of Individual Operator units (leakage, incident and compliance history, etc.)
 Threats - (Excavation Damage, Corrosion, Natural Forces, Other Outside Forces, Material or Welds, Equipment, Operations, Other)

SLR Notes:
 a. Yes they have this in their GIS mapping system.
 b. Length of time is in their procedures for prioritizing operator inspections.
 c. History is in their procedures for prioritizing operator inspections.
 d. Yes they factor the results of their (standard) inspections

2 Are inspection units broken down appropriately? (see definitions in Guidelines) .5 0.5
 Yes = .5 No = 0

SLR Notes:
 Yes per every definition in the Guidelines.

3 Does state inspection process target high risk areas? .5 0.5
 Yes = .5 No = 0

SLR Notes:
 Yes the process targets "high risk". Define high risk areas.

Use of Data to Help Drive Program Priority and Inspections

4 Does state use data to analyze effectiveness of damage prevention efforts in the state? (DIRT or other data, etc) .5 NA
 Yes = .5 No = 0

SLR Notes:
 They started collecting the data to analyse the effectiveness of their damage prevention efforts.

5 Has state reviewed data on Operator Annual reports for accuracy? .5 0.5
 Yes = .5 No = 0

SLR Notes:
 Yes they look at each operator's annual report during inspections. Their admin person also looks at the reports for accuracy and to denote any unusual changes.

6 Has state analyzed annual report data for trends and operator issues? .5 0.5
 Yes = .5 No = 0

SLR Notes:
 They look for trends such as increases in leaks and lost gas, and reduction in the amount of bare pipe for each applicable operator.

7 Has state reviewed data on Incident/Accident reports for accuracy? .5 0.5
 Yes = .5 No = 0

SLR Notes:
 Yes they enter data in their database and then reiew the following 7100 reports for accuracy. They also coordinate with our region's Accident Investigator and update accident reports to him.

8 Does state do evaluation of effectiveness of program based on data? (i.e. performance measures,trends,etc.) .5 0.5
 Yes = .5 No = 0

SLR Notes:



Yes they have a Government Management Accountability and Performance (GMAP) submitted to the Commissioners and Governor at least annually.

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

SLR Notes:

Yes they did input all operator qualification inspection results into web based database provided by PHMSA in a timely manner during 2008.

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

SLR Notes:

Yes they have in the last 3 years.

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

SLR Notes:

Yes the field protocol forms were uploaded in 2008 (Form19).

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

SLR Notes:

Yes they use the Federal Protocols to conduct HL IMP Inspections.

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

SLR Notes:

Not yet. The state can ask if the operator has but how do they confirm that the transmission operators have submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submission if the state does not have access to NPMS.

Accident/Incident Investigation Learning and Sharing Lessons Learned

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

SLR Notes:

They did this in 2008 when they submitted their state reports at the NAPSRS WR Meeting. In PHMSA Forums Dave has an article on the PBV valve situation and on accurate leak surveys.

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

SLR Notes:

Yes they have always responded to PHMSA and NAPSRS data gathering efforts concerning accidents.

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

SLR Notes:

They investigate for the root cause for NOPVs. Al Jones has recently attended the 1st PHMSA course for this in Houston. They could develop this further.

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

SLR Notes:

Yes for NOPVS after an accident such as the ExxonMobile accident in 2008.

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

SLR Notes:

Al Jones has recently attended the PHMSA course for this in Houston PL3600 RootCause\Incident investigation Course. Course was presented by Conger & Elsea just last February 2009.

Transparency - Communication with Stakeholders

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

SLR Notes:

Yes per their email LIST SERVE that goes to all stakeholders.

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

SLR Notes:

Yes per their WUTC public website and LIST SERV.

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

SLR Notes:

Total points scored for this section: 9
Total possible points for this section: 9.5



PART H - Miscellaneous

Points(MAX) Score

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

SLR Notes:

Meeting set for June 2009 to revisit the dig law. Damage data - Anne is checking damages to know that ~ 70% of all damages are third party hits. Anne checked the 2007 and 2008 gas data for incidents.
Attended the NAPS National Meeting. Dave is on ASME B31 Q committee and plastic pipe ad hoc committee. Kuang is on the ASME B31 Committee.

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

SLR Notes:

Quickly getting up to speed and further concerning Damage Prevention and preesing for authority to enforce damage prevention. Working on shoring up and increasing their incident root cause investigations.

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

SLR Notes:

They have their state GIS mapping system identifying HCAs and USA's that they also use for elevations relating to possible internal corrosion.

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

SLR Notes:

The WUTC has participated in and responded to our D&A survey and all NAPS Surveys.

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

SLR Notes:

They share best practices through their state reports and close coordination with their neighbors Oregon and Idaho.

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

SLR Notes:

Dave Lykken covered all the vacant positions in 2008 until they were filled. They had a recent ruling stating that their staff is now overtime eligible.

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



PART I - Program Initiatives

Points(MAX) Score

Drug and Alcohol Testing (49 CFR Part 199)

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

SLR Notes:

The WUTC has been doing that since 1999 and even wrote PSE up for their D&A Program. Our PHMSA D&A form is 12 years old and needs to be updated and then our D&A training needs to be updated.

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

SLR Notes:

Yes when they perform the O&M headquarters inspections per their WUTC D&A forms.

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

SLR Notes:

Yes when there are positive tests per their D&A Form.

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

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

SLR Notes:

They did them when the OQ rule came out. They do the HQ OQ on new operators and they do the OQ field verifications.

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

SLR Notes:

Yes per our form and the answer in I.4.

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

SLR Notes:

Yes they check the OQ cards and the persons for qualification when they perform an OQ field inspection.

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

SLR Notes:

They verify that persons in the field performing covered tasks are requalified within the requalification intervals.

Hazardous Liquid Pipeline Integrity Management (49 CFR Part 195.452)

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

SLR Notes:

All of their state HL operators in HCAs have Liquid IMP programs.

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

SLR Notes:

Yes the WUTC did by using their GIS Mapping System to verify HCAs.

10	Has the state reviewed operator IMPs for compliance with 195.452? Yes = .5 No = 0	.5	0.5
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SLR Notes:

Yes the state reviewed all operator IMPs and verified their IMP program per our federal IMP field verification program.

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

Yes per the answer to I.10 and they do monitor the operator's remedial actions.

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

Yes they complete the operators answer to our question 4. A. on the IMP field verification form.

Public Awareness (49 CFR Section 195.440)

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

Yes per the Public Awareness questions on page 17 of 23 on our Standard HL Inspection Form.

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

Yes they participated in the Clearinghouse and modified their letters to the operators to encompass a more comprehensive site specific plan.

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

Yes per our the Public Awareness Program questions on our federal standard inspection form.

16	Part I: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only
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SLR Notes:

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

