



2010 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 -- Accident Investigations
- E -- Damage Prevention Initiatives
- F -- Field Inspection
- G -- PHMSA Initiatives - Strategic Plan
- H -- Miscellaneous
- I -- Program Initiatives



2010 Hazardous Liquid State Program Evaluation -- CY 2010
Hazardous Liquid

State Agency: Washington
Agency Status:
Date of Visit: 06/27/2011 - 07/01/2011
Agency Representative: David Lykken, Pipeline Safety Director
 Steven King, Director Safety & Consumer Protection
 Joe Subsits, Chief Engineer
PHMSA Representative: Glynn Blanton, DOT/PHMSA State Programs
Commission Chairman to whom follow up letter is to be sent:
Name/Title: Jeffrey D. Goltz, Chairman
Agency: Washington Utilities and Transportation Commission
Address: 1300 S. Evergreen Park Drive SW PO Box 47250
City/State/Zip: Olympia, WA 98504-7250

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 2010 (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	24	24
B Inspections and Compliance - Procedures/Records/Performance	23.5	23.5
C Interstate Agent States	3	3
D Accident Investigations	5.5	5.5
E Damage Prevention Initiatives	9	9
F Field Inspection	12	12
G PHMSA Initiatives - Strategic Plan	9.5	8.5
H Miscellaneous	3	3
I Program Initiatives	9	9
TOTALS	98.5	97.5
State Rating		99.0

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) b. Total state inspection activity (2) c. Hazardous Liquid facilities subject to state safety jurisdiction (3) d. Hazardous Liquid pipeline incidents (4) e. State compliance actions (5) f. State record maintenance and reporting (6) g. State employees directly involved in the Hazardous Liquid pipeline safety program (7) h. State compliance with Federal requirements (8) 	8	8
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SLR Notes:

Yes, all information was submitted correctly on the 2011 certification document.

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? - Mechanism should include receiving "after hours" reports) (Chapter 6) Previous Question A.2</p> <p>Yes = 1 No = 0</p>	1	1
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SLR Notes:

Yes, incident reporting is required under WUTC's Commission rule 480-75-630. The telephone number is 1-888-321-9146. Staff members track the reports by the agency's database program and print the information prior to calling or visiting the operator.

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, a Hazardous Liquid Safety Seminar was held in Olympia, WA on May 12, 2011. The number of participants was 29 representing 9 companies. The seminar was coordinated with the T&Q training center and other industry representatives.

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, I reviewed their Pipeline Safety Data Base. File folders and information provided during this review was found well organized in individual folders. I reviewed the record center location where these files are maintained and it was under a secure environment.

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:

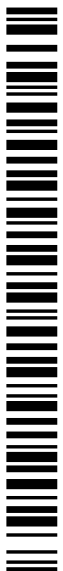
Yes, David Lykken has a good working knowledge about documents that need to be submitted to PHMSA pertaining to the Hazardous Liquid grant program and excellent management and field inspection experience. David served as Chief Engineer for 6 years with WUTC prior to assuming the Director, Pipeline Safety position in November, 2009.

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> <p>Yes = 1 No = 0</p>	1	NA
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SLR Notes:

No response was necessary due to no items of concern were found or noted.

7	<p>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</p>	1	NA
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Yes = 1 No = 0

SLR Notes:

No response was necessary due to no items of concern were found or noted.

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

Yes = 3 No = 0

SLR Notes:

Yes, all engineers have completed the required training courses at T&Q.

- | | | | |
|----------|--|-----------|-----------|
| 9 | Brief Description of Non-T&Q training Activities | Info Only | Info Only |
|----------|--|-----------|-----------|

Info Only = No Points

For State Personnel:

On October 26-27, 2010 House Fire Explosion Investigation Training was conducted in-house with all engineers attended the course. The course was presented by Sammy Russo. Additionally, on November 16, 2010, all engineers attend the Incident Investigation/Root Cause Analysis Training conducted by Baker Engineering & Risk Consultants, Inc. at their location.

For Operators:

A Hazardous Liquid T&Q Seminar was conducted in May, 2011. Two damage prevention training seminars were conducted in Vancouver and Spokane, WA. Representatives from the operators and contractor communities were in attendance.

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

WUTC continues to participate in the Citizens Committee on Pipeline Safety meetings providing education on pipeline safety regulations and initiatives from PHMSA.

SLR Notes:

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

Yes = 1 No = 0

SLR Notes:

Yes, all lead engineers have completed the required T&Q courses and computer based training before conducting OQ inspections. David Cullom, Pipeline Safety Engineer, is scheduled to attend the OQ training and complete the WBT course in 2012.

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

Yes = 1 No = 0

SLR Notes:

Yes, Joe Subsits, Scott Rukke, Chu Kuang are the lead engineers and have completed all required courses.

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

Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):

88.79

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

220 X 0.73 = 160.60

Ratio: A / B

88.79 / 160.60 = 0.55

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

Points = 5

SLR Notes:

A = 88.79 total inspection person days: B: (220 x .73=160.6) A/B= 88.79/160.6= 0.55 meets the larger amount of .38 requirements. This amount meets the larger amount and an award of five points is charged in this category.

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:

WUTC will be adding one engineer to their pipeline and hazardous liquid programs in calendar year 2011. Alan Jones will be performing and spending more time in the integrity management review of operators.

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

SLR Notes:

No issues or areas of concern in this section.

Total points scored for this section: 24
Total possible points for this section: 24



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) 6.5 6.5
 Previous Question B.1 + Chapter 5 Changes
 Yes = 6.5 No = 0 Needs Improvement = 50% Deduction
- a Standard Inspections (Including LNG) (Max points = 2) Yes No Needs Improvement
 - b IMP Inspections (Including DIMP) (Max points = .5) Yes No Needs Improvement
 - c OQ Inspections (Max points = .5) Yes No Needs Improvement
 - d Damage Prevention (Max points = .5) Yes No Needs Improvement
 - e On-Site Operator Training (Max points = .5) Yes No Needs Improvement
 - f Construction Inspections (Max points = .5) Yes No Needs Improvement
 - g Incident/Accident Investigations (Max points = 1) Yes No Needs Improvement
 - h Compliance Follow-up (Max points = 1) Yes No Needs Improvement

SLR Notes:

- a: Yes, WUTC Pipeline Safety Section Policy & Procedure Manual , Section 14, 15 & 16
- b: Yes, Hazardous Liquid Integrity Management Inspection, Section 23
- c: Yes, Section 17
- d: Yes, Section 33 has been added to the WUTC Pipeline Safety Section Policy Manual
- e: Yes, Section 27 (Operator Training & Technical Assistance)
- f: Yes, Section 21
- g: Yes, Section 19, OPS Failure Investigation Policy and Section 20, Major Incidents
- h: Yes, Section 26, Compliance Follow-up Inspections were added in 2010 to the manual.

- 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 2 2
 Yes = 2 No = 0 Needs Improvement = 50% Deduction
- a Length of time since last inspection Yes No Needs Improvement
 - b History of Operator/unit and/or location (including leakage , incident and compliance history) Yes No Needs Improvement
 - c Type of activity being undertaken by operator (construction etc) Yes No Needs Improvement
 - d For large operators, rotation of locations inspected Yes No Needs Improvement

SLR Notes:

Yes, WUTC's Inspection Manual Section 1.3 address the scheduling and prioritization of the hazardous liquid operator inspection reviews.

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 2 2
 Yes = 2 No = 0

SLR Notes:

Yes, in calendar year 2010 they inspected seven of the eleven hazardous liquid operators. The remaining four will be scheduled within a three year time schedule.

- 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
 Yes = 1 No = 0

SLR Notes:

Yes, a review of WTUC's inspection forms indicates all items in the federal inspection document match their form.

- 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, all portions of the inspection form are being completed with required information. I reviewed seven inspection reports performed by staff members in 2010 and found all information in the forms were complete and accurate.



6	Did the state initiate appropriate follow-up actions to Safety Related Condition Reports? (Chapter 6.3) Previous Question B.7 Yes = .5 No = 0	.5	NA
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SLR Notes:

No safety related reports were submitted in 2010.

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 Yes = .5 No = 0	.5	0.5
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SLR Notes:

Yes, this information is reviewed with the operator during the Standard Inspection Report for Intrastate Hazardous Liquid Pipeline System Form G-2, section 205 thru 244. Also, the Breakout Tank Inspection Form 10 identifies this item in Section V Tank Data and Field Review.

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 Yes = .5 No = 0	.5	0.5
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SLR Notes:

Yes, a review of the inspection performed on McChord Pipeline Company May17-19, 2010 indicated the abandonment issue is addressed in the inspection form. Questions 78.

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 Yes = .5 No = 0	.5	0.5
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SLR Notes:

Yes, WUTC GIS mapping and Map Viewer allow the public to identify environmentally sensitive areas and the location of pipelines in the State of Washington. The GIS mapping system allows WUTC staff to make copies of the pipeline location and facilities prior to performing an inspection.

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(c)(5)? Previous Question B.11 Yes = 1 No = 0	1	1
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SLR Notes:

Yes, WUTC reviews the operator's records of previous accidents and failures which include the reporting of third party damage and leaks to ensure the operator's response comply with 195.402(c)(5). I reviewed Chevron Pipe Line inspection report dated July 13-14, 2010 and found this information was addressed with the operator.

Compliance - 60105(a) States

11	Did the state adequately document sufficient information on probable violations? (Chapter 5.2) Previous Question B.13 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

Yes, a review of the inspection on Chevron Ferndale Storage Terminal July 13-14 found adequate documentation was being recorded on the 11 violations cited.

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 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

Yes, this is described in WUTC Pipeline Safety Policy & Procedures, Section 34, Safety & Consumer Protection Division Compliance & 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, this is described in WUTC Pipeline Safety Policy & Procedures in Section 34, Safety & Consumer Protection Division Compliance & Enforcement Manual page 13.

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, this information is located in the WUTC "Project Tracking System". The Pipeline Safety Policy & Procedures section 25 identifies in detail and requires a routine review of the progress toward compliance actions to prevent delays or breakdown of the enforcement process. They have a ticker system within their email server that alerts the Director & Chief Engineer about compliance actions.

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, a review of the inspection on Chevron Ferndale Storage Terminal July 13-14 found 11 violations were cited.

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:

Yes, a review of the inspection report on Chevron Ferndale Storage Terminal July 13-14 found 11 violations were cited. WUTC is following its Pipeline Safety Policy & Procedures in Section 26, Compliance Follow-up Inspections, regarding the corrective action the operator is taking to correct the violations.

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 conducted in calendar year 2010.

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, a review of Chevron Ferndale Storage Terminal inspection report indicated this was being accomplished.

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, a review of letters and other correspondence to Chevron Ferndale Storage Terminal operator indicate all information is being sent to the company officer.

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, this information is described in WUTC's Pipeline Safety Policy and Procedures in Section 34, Safety and 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 1 NA
Yes = 1 No = 0 Needs Improvement = .5

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

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

27 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) Info Only Info Only
Info Only = No Points

SLR Notes:

Yes, the program manager is familiar with the state process for imposing civil penalties and this information is described in WUTC's Pipeline Safety Policy & Procedures, Section 34. Safety & Consumer Protection Division Compliance & Enforcement Manual.

28 Part B: General Comments/Regional Observations Info Only Info Only
Info Only = No Points

SLR Notes:

No issues or areas of concern in this section.

Total points scored for this section: 23.5
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 are using the federal inspection forms. A review of the inspection performed on Conoco Phillips Pipe Line Company on October 28, 2010 indicated this requirement is being met.

- 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, this information is documented and posted in SMART by PHMSA Western Region. Information on interstate inspection units is identified in WUTC spreadsheet and well documented with inspection units and items found in non-compliance with the regulations.

- 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, all information on inspections performed is submitted by WUTC to PHMSA Western Region office within thirty days after completion of the inspection visit.

- 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 NA
Yes = 1 No = 0

SLR Notes:

No probable violations were found or referred to PHMSA Western Region in calendar year 2010.

- 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 hazardous leaks or danger to the public were reported in calendar year 2010.

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

SLR Notes:

No probable violations were cited or forwarded to PHMSA Western Region in calendar year 2010.

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

SLR Notes:

No probable violations were cited or forwarded to PHMSA Western Region in calendar year 2010.

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

SLR Notes:

No issues of concern in this section.

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



PART D - Accident 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, WUTC personnel are following the written procedures for Federal/State cooperation in case of an accident. In my review of the ConocoPhillips Pipe Line Company accident in the Yellowstone Pipe Line Spokane area on February 22, 2010, WUTC notified PHMSA about the incident and monitored the filing of the accident report.

- 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, WUTC is familiar and aware of the jurisdictional authority and Memorandum of Understanding between NTSB and PHMSA.

- 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, only one hazardous liquid incident report was made in 2010. A review of the file folder indicated information was adequately received.

- 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:

Yes. No onsite investigation was performed on ConocoPhillips Pipe Line Company accident because information about the incident was obtained by telephone calls. Information reviewed in the file indicated sufficient data was provided which would not require WUTC to perform an onsite investigation.

- 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, information located in the file folder indicated the investigation was thorough and findings of facts were determined.

- 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:

No intrastate accidents or investigations occurred in 2010.

- 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:

No intrastate accidents or investigations occurred in 2010. N/A

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

SLR Notes:



No issues or areas of concern in this section.

Total points scored for this section: 5.5
Total possible points for this section: 5.5



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 | 2 |
|----------|--|---|---|

SLR Notes:

Yes. A review of WUTC Form G1, Standard Liquid Inspection - Procedures and Plan Review, section 202, page 18 of 23 indicate this information is included in their review. WTUC reviews the directional drilling/boring procedures with 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.

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|----------|--|---|---|
| 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, this requirement is located on WUTC Form G2, Standard Inspection Report for Intrastate Hazardous Liquid Systems ?Records and Field Inspection, section 84-90 page 5 of 10.

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|----------|---|---|---|
| 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, WUTC staff members are encouraging stakeholder groups at the Northwest Common Ground Meetings to use the best practices document to prevent damages from occurring on underground facilities.

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

SLR Notes:

Yes, WUTC has a State Damage Prevention Statistics Mandatory Reporting form requirement for those operators under their jurisdiction to report damages. They have implemented the Virtual DIRT program , a volunteer participation for only pipeline operators to report the number of pipeline damages per 1,000 locate request in 2009. In January 1, 2013, the new damage prevention law will require all underground operators and excavators to report all damages via the Virtual Dirt Program to WUTC.

- | | | | |
|----------|---|---|---|
| 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 195.402 (c)(5)?
Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

Yes, this requirement is in their accident and incident reporting form located in Standard Inspection Report for Intrastate Hazardous Liquid Systems Record Review and Field Inspection Form G-2.

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

SLR Notes:

No issues or areas of concerns in this section.

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



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:
 Tidewater Terminal

Name of State Inspector(s) Observed:
 Joe Subsits, Chief Engineer & David Cullom, Engineer

Location of Inspection:
 Pasco, WA

Date of Inspection:
 July 13-14, 2011

Name of PHMSA Representative:
 Glynn Blanton, PHMSA State Programs

SLR Notes:

The following individuals were present during the performance of the standard hazardous liquid inspection performed by Joe Subsits and David Cullom with the Washington Utilities and Transportation Commission. Mark Davis, Terminals Operations Supervisor, Josh Jarman, EHS&S Specialist, William (Bill) Collins, Environmental Manager and Ron McClary, Terminals Maintenance Supervisor.

The hazardous liquid pipeline and terminal breakout tanks were constructed and installed from 1953 to 1996. The earliest tanks were installed in 1951,2 tanks installed in 1977 and two in 1996. The three pipelines cross Washington State Highway 12 South and connect to Chevron Pipe Line Company on Sacajawea Park Road in Pasco, WA. The approximately length of each line is 1 mile in length. The pipelines have 2 block valves per line and the MAOP is 290 psig. The pipelines operate at less than 20% of SMYS and were hydro tested when installed. There are nineteen breakout tanks that are jurisdictional to WUTC.

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, Tidewater Terminal representatives Bill Collins, Environmental Manager, Mark Davis, Terminals Operations Supervisor, Ron McClary, Terminal Maintenance Supervisor and Josh Jarman, EHS&S Specialist were contacted and provided a copy of the standard inspection form that would be used during the inspection.

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, Joe Subsits provided a copy of WUTC's Standard Inspection Report for Hazardous Liquid Systems, form G-2 Rev 1 June 2011, and Breakout Tank Inspection Form-10 to each of the Tidewater Terminal representatives at the start of the inspection.

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

SLR Notes:

Yes, Joe Subsits and David Cullom documented each response from the Tidewater representatives to the questions asked. The forms consisted of four specific blocks at the end of each question pertaining to compliance with the pipeline safety regulations or Washington State Commission rules. If no area of concerns or compliance issues were found the "S" satisfactory was checked. The letter "U" unsatisfactory was used when a violation was cited and a description of the reason for the violation was provided in the comment section of the form. Several violations or areas of concern were found or cited during this inspection.

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, Joe Subsits and David Cullom reviewed the operator's maps on the existing pipeline and breakout tanks, test stations, rectifier locations, valves and pump station. During the field inspection, observed Tidewater personnel taking pipe to soil readings at each test station and rectifier location. No low readings were noted during the field inspection. Minor atmospheric corrosion was found at the interconnection pipelines with Chevron Pipe Line Company on Sacajawea Park Road in Pasco, WA.

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



SLR Notes:

Joe Subits and David Cullom conducted a Standard Inspection using WUTC's Standard Report for Intrastate Hazardous Liquid Systems Procedures and Plan Review, Form G-2 and Breakout Tank Inspection Form -10.

- | | | | |
|----------|--|-------------------------------------|---|
| 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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| a. | Procedures | <input checked="" type="checkbox"/> | |
| b. | Records | <input checked="" type="checkbox"/> | |
| c. | Field Activities/Facilities | <input checked="" type="checkbox"/> | |
| d. | Other (Please Comment) | <input type="checkbox"/> | |

SLR Notes:

Joe Subits and David Cullom werer observed reviewing the operations and maintenance records and drug and alcohol procedures for compliance with federal and state regulations. On the second day, observed the field inspection of the pipeline connected to Chevron, pipe-to-soil readings, pump station, and breakout tank field verification. The final records review portion or exit interview with the operator was scheduled to be conducted the next day after the field observation.

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

SLR Notes:

Yes, Joe Subits and David Cullom demonstrated a good working knowledge of the safety rules and regulations pertaining to hazardous liquid products transported by pipelines.

- | | | | |
|----------|--|---|---|
| 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
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes, Joe Subits reviewed with the operator representatives at the end of the day areas of concern or potential violatons of the pipeline safety regulations or Washington UTC rules.

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

SLR Notes:

Yes, Joe Subits at the end of each day provided a list of areas of concern or violations to the operator representatives.

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

SLR Notes:

Tidewater Terminal personnel were observed taking pipe-to-soil potential and rectifier readings, turning valves, monitoring flow readings and product loading of gasoline into transport trucks.

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

SLR Notes:

Tidewater Terminal has an excellent safety record. The last reported accident occurred on their facility in 2006.

- | | | | |
|-----------|--|-------------------------------------|-----------|
| 13 | Field Observation Areas Observed (check all that apply)
Info Only = No Points | Info Only | Info Only |
| a. | Abandonment | <input type="checkbox"/> | |
| b. | Abnormal Operations | <input type="checkbox"/> | |
| c. | Break-Out Tanks | <input checked="" type="checkbox"/> | |
| d. | Compressor or Pump Stations | <input checked="" type="checkbox"/> | |
| e. | Change in Class Location | <input type="checkbox"/> | |
| f. | Casings | <input type="checkbox"/> | |



- 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

SLR Notes:

Tidewater Terminals operation and maintenance records and procedures pertaining to the items checked above were observed and reviewed during the office and field inspection. Atmospheric corrosion, rectifier readings, valve maintenance and breakout tanks were observed during the field portion of the inspection performed on July 14th.

14 Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

Joe Subsits performed a thorough and comprehensive inspection. He asked several good questions about the operations of the facility and was respectful to the operator's comments.

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



PART G - PHMSA Initiatives - Strategic Plan

Points(MAX) Score

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:

Yes, WUTC continues to maintain a GIS mapping system on the location of all pipelines in Washington State that is used in establishing their inspection reviews. WUTC assigns a risk ranking factor on each operator based on their previous inspection of the system, length of time from previously inspected and other risk factors contained in their procedures. Each operator is inspected not to exceed three years or based on the risk rating established.

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

SLR Notes:

Yes, a review of their work plan indicated all units are broken down correctly and meet the suggested definition in the Guidelines for States Participating in the Pipeline Safety Program.

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

SLR Notes:

Yes, they review high risk areas each year in their inspection program as mentioned in their WUTC's Safety Policy and Procedures Manual.

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 0.5
Yes = .5 No = 0

SLR Notes:

Yes, they review data available from the operator to determine the effectiveness of their state's damage prevention efforts.

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

SLR Notes:

Yes, WUTC reviews each operator's annual report for errors and omissions as they are filed with their organization. Each engineer and the Administrative Assistant review the reports and call the operator(s) if information is missing or different from previously filed reports.

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

SLR Notes:

Yes, WUTC reviews the annual reports and may call the operator pertaining to safety related issues or near misses on hits to their facilities.

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

SLR Notes:

Yes, WUTC reviews data on the incident and accident reports submitted on DOT 7100 forms and post the information into their data base program.

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 the GMAP, General Management Accountability and Performance, to measure their goals and initiatives that are submitted to the WUTC Chairman and Governor annually. GMAP is the tool that helps Washington state agencies measure and improve their performance.

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? <small>Yes = .5 No = 0</small>	.5	0
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SLR Notes:

No, I reviewed the web site data base with Joe Subsits and found two operators BP Pipeline (North America) Inc. and ConocoPhillips Pipe Line Company were not entered into the data base. The Field Inspection Protocol forms were in the individual file folders but not uploaded into the data base. A loss of 0.5 point was charged.

10	Did the State submit their replies into the Integrity Management Database (IMDB) in response to the Operators notifications for their integrity management program? <small>Yes = .5 No = 0</small>	.5	NA
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SLR Notes:

WUTC was not required to reply to the Integrity Management Database.

11	Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17 <small>Yes = .5 No = 0</small>	.5	0
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SLR Notes:

No, a review of the data base found all IMP Federal Protocol forms were not uploaded into the IMDB. Chevron Pipe Line Company inspection performed on May 10-13, 2010 was not uploaded into the data base program. A loss of 0.5 points was assessed.

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 <small>Yes = .5 No = 0</small>	.5	0.5
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SLR Notes:

Yes, they use the federal protocols when they conduct their integrity management 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? <small>Yes = .5 No = 0</small>	.5	0.5
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SLR Notes:

Yes, this information is included in WUTC Form C page 3 of 26. On February 9, 2010, WUTC sent a notice to each operator about updates on reporting and submitting information into the National Pipeline Mapping System database.

Accident/Incident Investigation Learning and Sharing Lessons Learned

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

Yes, information is shared and discussed with NAPSRS members informatively during the NAPSRS Western Region meeting. A legislative fact sheet was sent to their State House and Senate members about their pipeline safety program in calendar year 2010.

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

Yes, WUTC support data gathering efforts concerning accidents and often shares the information with PHMSA and their neighboring state partners.

16	Does state have incident/accident criteria for conducting root cause analysis? <small>Info Only = No Points</small>	Info Only	Info Only
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SLR Notes:

Yes, they conduct a root cause analysis after each incident or accident that occurs in their state.

17	Does state conduct root cause analysis on incidents/accidents in state? <small>Info Only = No Points</small>	Info Only	Info Only
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SLR Notes:

Yes, they conduct a root cause analysis after each incident or accident that occurs in their state.



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

SLR Notes:

Yes, Joe Subsits, Scott Rukko and Al Jones have completed the root cause course at T&Q. Other WUTC staff engineers are scheduled to attend the T&Q course in 2011.

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, WUTC has a web server available to all operators, general public or individuals who want to subscribe and receive or review information about their pipeline safety program. Additionally, information on their inspection history and map viewer, location of the pipeline facilities in Washington State, is available on the WUTC website.

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

SLR Notes:

Yes, this information is available on WUTC web site along with other important data.

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

SLR Notes:

Loss of points on Questions G-09 & G-11. Total of 1.0 point from this section of the state evaluation review.

See comments below pertaining to loss of points:

Question G-09: I reviewed the web site data base with Joe Subsits and found two operators, BP Pipeline (North America) Inc. and ConocoPhillips Pipe Line Company were not entered into the data base. The Field Inspection Protocol forms were in the individual file folders but not uploaded into the data base. A loss of 0.5 point was charged.

Question G-11: A review of the data base found all IMP Federal Protocol forms were not uploaded into the IMDB. Chevron Pipe Line Company inspection performed on May 10-13, 2010 was not uploaded into the data base program. A loss of 0.5 point was charged.

Total points scored for this section: 8.5
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 R .5 0.5
Activities and Participation, etc.) Previous Question A.15
Yes = .5 No = 0

SLR Notes:

Passage of the Washington's new Underground Utility Damage Prevention Act. Governor issued a proclamation on March 25, 2010 proclaiming April, 2010 as the "Safe Digging Month" for the State of Washington. After receiving a grant from PHMSA, WUTC developed and implemented a Damage Prevention Communication Plan in an effort to reduce incidents and improve damage prevention in Washington. This was a media initiative by WUTC via radio and TV to reach the general public about safe digging practices and 811 messages. Damaged Prevention booth manned at annual Governors Industrial Safety and Health Conference. Promoted WUTC Consumer Affairs Hotline for excavators to report issues with timeliness or inaccurate locates.

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

SLR Notes:

WUTC was successful in getting a change in Washington's State Underground Utility Damage Prevention Act. The new law change is effect on January 1, 2013. The law requires damages to underground utilities to be reported to WUTC, establishes a Damage Prevention Account fund and enforcement procedures for WUTC to address violations involving WUTC and non-WUTC regulated entities or facilities. In 2011, WUTC will be hiring one additional engineer to add to their existing natural gas and hazardous liquid programs. This individual will work primary in the natural gas program.

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

SLR Notes:

Yes. The use of the GIS mapping system continues to be used in locating HCA's. WUTC has a map viewer for the public to access from their web site to locate all hazardous pipelines in their county areas.

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

SLR Notes:

Yes, they response to all PHMSA and NAPS R surveys in a timely matter. WUTC was surveyed by Federal General Accounting Office recently on the issues pertaining to jurisdictional facilities in their state and what practices there state is using to help ensure the safety of PHMSA unregulated gathering pipelines.

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

SLR Notes:

Yes. WTUC staff and program manager continue to share information on reports, documents, and best practices on performing inspections with other state agencies. David Lykken has provided information to his neighboring state agencies, Oregon and Idaho, about their inspections and areas of concerns on the operators who operates in each state. This has been valuable information to each state agency in maintaining fair, balance and consistent enforcement.

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

SLR Notes:

No issues of concern in this section.

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:

Yes, WUTC has performed and verified the operator's drug and alcohol testing since 2000. In calendar year 2010, they performed two inspections on two different hazardous liquid operators. Those operators were McChord Pipeline Company and Chevron Pipe Line Company on May 17 and May 15, 2010.

- | | | | |
|----------|--|----|-----|
| 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, they performed and checked this item during the standard inspection performed on all operators.

- | | | | |
|----------|---|----|-----|
| 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, the operators are required to report this item to their agency as a reporting requirement. This requirement is found in WUTC rule WAC 480-93-200 (10). WUTC staff members also verify this item during the standard inspection reviews.

Qualification of Pipeline Personnel (49 CFR Part 195 Subpart G)

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

SLR Notes:

Yes, they verified this information on their initial inspections which include construction and other types of inspections. Staff review the operator's abnormal operating procedures and other relative information on the OQ program during the inspection review.

- | | | | |
|----------|--|----|-----|
| 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, this information is verified and WUTC insures the operator's qualification program complies with PHMSA rules and protocols thru their inspection visits.

- | | | | |
|----------|--|----|-----|
| 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, this requirement is checked during the standard inspection visit and is listed on their inspection form.

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

Yes, during construction and field inspection visits they review the individual's covered task card to insure the person has been re-qualified at the intervals described in the operator's program. This review item is listed in their standard inspection form.

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:

Yes, this was verified on the initial review of all hazardous liquid pipeline operators.

- | | | | |
|----------|--|----|-----|
| 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, WUTC has verified this requirement through their GIS mapping and discussions with the operator during the inspection.

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, this has been reviewed with each operator and found to meet the requirements of 195.452.

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, this is included in the IMP field verification program and monitored by one WUTC Engineer.

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, this is verified and checked during the field verification program which is contained in the standard inspection 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, this item is checked during the Standard Inspection Report for Intrastate Hazardous Liquid System Records Review and Field Inspection Form G-2.

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
-----------	--	----	-----

SLR Notes:

Yes, WUTC has reviewed the contents of the operator's program for compliance with 195.440 by participating and entering information into the PHMSA Clearinghouse web site.

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
-----------	--	----	-----

SLR Notes:

Yes, this information is reviewed on their Standard Inspection Report for Intrastate Hazardous Liquid System Records Review & Field Inspection Form G-2, Section 77.

16	Is the state verifying that operators have evaluated their public awareness programs for effectiveness as described in RP1162? Info Only = No Points	Info Only	Info Only
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SLR Notes:

Yes, this is reviewed during their inspection visits.

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

No areas of concern or issues in this section.

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

