



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

1200 New Jersey Avenue SE  
Washington DC 20590

# 2021 Hazardous Liquid State Program Evaluation

for

Washington Utilities and Transportation Commission

## Document Legend

### PART:

- O -- Representative, Dates and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- State Qualifications
- D -- Program Performance
- E -- Field Inspections
- F -- Damage prevention and Annual report analysis
- G -- Interstate Agent/Agreement States



2021 Hazardous Liquid State Program Evaluation -- CY 2021  
Hazardous Liquid

**State Agency:** Washington

**Rating:**

**Agency Status:**

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

**Date of Visit:** 04/07/2022 - 04/07/2022

**Agency Representative:** Sean Mayo, Director, Pipeline Safety Division, WUTC

**PHMSA Representative:** David Lykken, Transportation Specialist, PHMSA State Programs

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

**Name/Title:** David W. Danner, Chairman

**Agency:** Washington Utilities and Transportation Commission

**Address:** 621 Woodland Square Loop SE

**City/State/Zip:** Lacey, WA 98503

**INSTRUCTIONS:**

Complete this evaluation in accordance with the Evaluator Guidance for conducting state pipeline safety program evaluations. The evaluation should generally reflect state program performance during CY 2021 (not the status of performance at the time of the evaluation). 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 appropriate notes/comments section. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and they OBJECTIVELY reflect the state's program performance for the question being evaluated. Increasing emphasis is being placed on how the state pipeline safety programs conduct and execute their pipeline safety responsibilities (their performance). This evaluation, together with selected factors reported in the state's annual progress report attachments, provide the basis for determining the state's pipeline safety grant allocation.

**Scoring Summary**

<b>PARTS</b>	<b>Possible Points</b>	<b>Points Scored</b>
A Progress Report and Program Documentation Review	0	0
B Program Inspection Procedures	15	15
C State Qualifications	10	10
D Program Performance	50	50
E Field Inspections	15	10
F Damage prevention and Annual report analysis	6	6
G Interstate Agent/Agreement States	0	0
<b>TOTALS</b>	<b>96</b>	<b>91</b>
<b>State Rating</b> .....		<b>94.8</b>



# PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- 1 Were the following Progress Report Items accurate? (\*items not scored on progress report) Info Only Info Only  
Info Only = No Points
- a. Stats On Operators Data - Progress Report Attachment 1
  - b. State Inspection Activity Data - Progress Report Attachment 2
  - c. List of Operators Data - Progress Report Attachment 3\*
  - d. Incidents/Accidents Data - Progress Report Attachment 4\*
  - e. Stats of Compliance Actions Data - Progress Report Attachment 5\*
  - f. List of Records Kept Data - Progress Report Attachment 6 \*
  - g. Staff and TQ Training Data - Progress Report Attachment 7
  - h. Compliance with Federal Regulations Data - Progress Report Attachment 8
  - i. Performance and Damage Prevention Question Data - Progress Report Attachment 10\*

Evaluator Notes:

a & c) Operator/Inspection Unit totals on Attachment 1 are consistent with the Operator/Inspection Unit totals on Attachment 3. b) No issues. d) No reportable incidents in CY2021. e) No PV's identified in 2021, none carried over from CY2020. g) Information verified through T&Q Blackboard training site. Training for personnel found to be complete and accurate. h) All rule amendments are up to date.

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



# PART B - Program Inspection Procedures

Points(MAX) Score

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|----------|---|---|---|
| <b>1</b> | Do written procedures address pre-inspection, inspection and post inspection activities for each of the following inspection types: Chapter 5.1<br>Yes = 5 No = 0 Needs Improvement = 1-4   | 5 | 5 |
|          | <ul style="list-style-type: none"><li>a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspections</li><li>b. IMP Inspections</li><li>c. OQ Inspections</li><li>d. Damage Prevention Inspections</li><li>e. On-Site Operator Training</li><li>f. Construction Inspections (annual efforts)</li></ul> |   |   |

Evaluator Notes:

No changes. Sections referenced come from the program's written Policy & Procedures Manual. a. Section 14 General and Specialized Insp Procedures, Section 15. Entire section devoted to Pre, Inspection, and Post inspection activities; b. Sections 22 (IMP); c. Section 17; d. Damage Prevention activities under Section 31; e. Section 27 - Training and Outreach Policy; f. Section 21 Design, Testing & Construction Inspections; g. Also Section 33 for CRM inspections.

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|----------|---|---|---|
| <b>2</b> | Do written procedures address inspection priorities of each operator, and if necessary each unit, based on the following elements and time frames established in its procedures? Chapter 5.1<br>Yes = 4 No = 0 Needs Improvement = 1-3  | 4 | 4 |
|          | <ul style="list-style-type: none"><li>a. Length of time since last inspection</li><li>b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)</li><li>c. Type of activity being undertaken by operators (i.e. construction)</li><li>d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.)</li><li>e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors)</li><li>f. Are inspection units broken down appropriately?</li></ul> |   |   |

Evaluator Notes:

No revisions from prior year. a thru e - Sections 13 and 13.1 Workplan Development and Scheduling; f. Units apportioned satisfactory.

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| <b>3</b> | (Compliance Procedures) Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1<br>Yes = 3 No = 0 Needs Improvement = 1-2  | 3 | 3 |
|          | <ul style="list-style-type: none"><li>a. Procedures to notify an operator (company officer) when a noncompliance is identified</li><li>b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns</li><li>c. Procedures regarding closing outstanding probable violations</li></ul> |   |   |

Evaluator Notes:

No changes from prior year. Sections referenced taken from the program's Policy & Inspection Manual. a thru c addressed under Sections 15 (Standard Intra Inspections & Correspondence), 25 (Compliance Enforcement Tracking Policy), Section 26 (Follow-up Inspection Policy), and Section 34 (Compliance and Enforcement Policy). Section 37 (Civil Penalty Consideration Factor Policy).

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|----------|--|---|---|
| <b>4</b> | (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident?<br>Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
|----------|--|---|---|

- a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports
- b. If onsite investigation was not made, do procedures require on-call staff to obtain sufficient information to determine the facts to support the decision not to go on-site.

Evaluator Notes:

No changes. Section 10 (On-Call and Telephonic Notification), Section 20 (Response to Pipeline Incidents), Section 24 (Investigations Policy), Section 24-A (Level of Investigation Matrix).

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**5** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues identified. No point deductions under Part B.

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



**PART C - State Qualifications**

**Points(MAX) Score**

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- 1** Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.3 **5** **5**  
Yes = 5 No = 0 Needs Improvement = 1-4
- a. Completion of Required OQ Training before conducting inspection as lead
  - b. Completion of Required IMP Training before conducting inspection as lead
  - c. Root Cause Training by at least one inspector/program manager
  - d. Note any outside training completed
  - e. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1)

**Evaluator Notes:**

a: Yes. All inspectors attended and successfully completed required OQ training. b: Yes. c: Yes. Nine inspectors including Chief Engineer and PM have completed Root Cause training. e. All inspection staff who conducted all inspection types performed in 2021 as lead were qualified.

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- 2** Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? **5** **5**  
Yes = 5 No = 0 Needs Improvement = 1-4

**Evaluator Notes:**

Yes. Sean Mayo has attended and successfully completed the T&Q Liquid Inspector and Failure paths required for the PM position. Sean has been with the safety program for 5 years.

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

**Evaluator Notes:**

No issues. No point deductions under Part C.

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



**PART D - Program Performance**

**Points(MAX) Score**

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|----------|--|---|---|
| <b>1</b> | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1<br>Yes = 5 No = 0 Needs Improvement = 1-4   | 5 | 5 |
|          | <ul style="list-style-type: none"><li>a. Standard (General Code Compliance)</li><li>b. Public Awareness Effectiveness Reviews</li><li>c. Drug and Alcohol</li><li>d. Control Room Management</li><li>e. Construction (did state achieve 20% of total inspection person-days?)</li><li>f. OQ (see Question 3 for additional requirements)</li><li>g. IMP (see Question 4 for additional requirements)</li></ul> |   |   |

**Evaluator Notes:**

a-g: Yes. No issues noted. Time intervals met for all inspection types. Refer to WA CY2021 Random Operator list for specifics.

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|----------|---|----|----|
| <b>2</b> | Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1. Do inspection records indicate that adequate reviews of procedures, records and field activities, including notes and the appropriate level of inspection person-days for each inspection, were performed?<br>Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
|          | <ul style="list-style-type: none"><li>a. Standard (General Code Compliance)</li><li>b. Public Awareness Effectiveness Reviews</li><li>c. Drug and Alcohol</li><li>d. Control Room Management</li><li>e. Construction</li><li>f. OQ (see Question 3 for additional requirements)</li><li>g. IMP (see Question 4 for additional requirements)</li></ul>   |    |    |

**Evaluator Notes:**

The program utilizes the IA application for conducting most inspection types except for construction and operator annual reviews.

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|----------|--|---|---|
| <b>3</b> | Is state verifying monitoring (Protocol 9/Form15) of operators OQ programs? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals established in the operator's plan. 49 CFR Part 195 Subpart G<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

**Evaluator Notes:**

No change. The program has reviewed OQ plans within the timeframes established. Protocol 9 inspections are conducted during LDC annual reviews, standard, and construction inspections.

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|----------|--|---|---|
| <b>4</b> | Is state verifying operator's integrity management Programs (IMP and DIMP)? This should include a review of plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operator's plan(s). 49 CFR Part 195 Subpart F & G<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|          | <ul style="list-style-type: none"><li>a. Are the implementation plans of the state's large/largest operators(s) being reviewed annually to ensure they are completing full cycle of the IMP process?</li></ul>   |   |   |

**Evaluator Notes:**

Yes. The program devoted 20 field days to IM inspection activities. Intervals have been met. IM Written Program changes and implementation activities reviewed during the annual operator review inspection.



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| 5 | Did the state review the following (these items are NTSB recommendations to PHMSA that have been deemed acceptable response based on PHMSA reviewing these items during the evaluation process): Chapter 5.1<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|   | a. 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; and   |   |   |
|   | b. 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;                        |   |   |

Evaluator Notes:

Items covered and included in the UTC Operator Annual Review Checklist. b. Reviewed under IA procedural questions PD. OC.ODPROGRAM.P and IM.RA.INFOCONSIDERED.P

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|---|--|---|---|
| 6 | Did the State verify Operators took appropriate action regarding advisory bulletins issued since the last evaluation? (Advisory Bulletins Current Year)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

Yes. Question is incorporated into the Operator Annual Review checklist along with a link to the PHMSA web site. Also addressed during HL operator meetings. No advisory bulletins issued in CY2021.

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|---|---|----|----|
| 7 | (Compliance Activities) Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1<br>Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
|   | a. Were compliance actions sent to company officer or manager/board member if municipal/government system?  |    |    |
|   | b. Were probable violations documented properly?  |    |    |
|   | c. Resolve probable violations  |    |    |
|   | d. Routinely review progress of probable violations   |    |    |
|   | e. Did state issue compliance actions for all probable violations discovered?   |    |    |
|   | f. Can state demonstrate fining authority for pipeline safety violations?   |    |    |
|   | g. Does Program Manager review, approve and monitor all compliance actions? (note: Program Manager or Senior Official should sign any NOPV or related enforcement action)   |    |    |
|   | h. Did state compliance actions give reasonable due process to all parties? Including "show cause" hearing, if necessary.   |    |    |
|   | i. Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns   |    |    |
|   | j. Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. (Incident investigations do not need to meet 30/90-day requirement)  |    |    |

Evaluator Notes:

Yes to items a thru j. Compliance letters reviewed. No PV's identified in CY2021. Correspondence sent to appropriate company official. Correspondence did not exceed the 90 day requirement. Most sent out within five to 10 business days of inspection completion. The program has demonstrated it's fining authority having last collected civil penalties in CY2017.

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|---|--|----|----|
| 8 | (Accident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations?<br>Yes = 10 No = 0 Needs Improvement = 1-9  | 10 | 10 |
|   | a. Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports?  |    |    |
|   | b. Did state keep adequate records of Incident/Accident notifications received?  |    |    |
|   | c. If onsite investigation was not made, did the state obtain sufficient information from the operator and/or by means to determine the facts to support the decision not to go on site? |    |    |
|   | d. Were onsite observations documented?  |    |    |
|   | e. Were contributing factors documented?   |    |    |



- f. Were recommendations to prevent recurrences, where appropriate, documented?
- g. Did state initiate compliance action for any violations found during any incident/accident investigation?
- h. Did state assist Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA?
- i. Does state share any lessons learned from incidents/accidents?

**Evaluator Notes:**

No reportable HL incidents again in CY2021. a: Pipeline operators contact the 24-Hr Emergency Response line which is then directed to the on-call engineer. b & c: Yes, when applicable. d, e & g: Yes, when applicable. h: The program maintains communications with PHMSA AID and Western Region offices during reportable events. I. Yes, during seminars and annual NAPSR meetings.

**9** Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1 1 1  
 Yes = 1 No = 0 Needs Improvement = .5

**Evaluator Notes:**

Typically yes. Letter to Chairman dated 8/25/2021. The program scored full points for HL program. No response required.

**10** Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5 Info Only Info Only  
 Info Only = No Points

**Evaluator Notes:**

During Covid-19 period only conducting meetings with the larger operators. The program anticipates going back to annual meetings with all operates in 2023.

**11** Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission? Info Only Info Only  
 Info Only = No Points

**Evaluator Notes:**

Yes as part of the operator's annual reviews. Item is included on the WUTC Annual Review inspection form.

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

**Evaluator Notes:**

Same as in past reviews. The WUTC web site provides information and links to other external resources including Call Before You Dig, State and Federal Pipeline Safety Rules, Pipeline News, Completed inspection reports, forms and compliance letters, Failure Investigation reports, enforcement action information, and the Citizens Committee on Pipeline Safety.

**13** Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.7 1 1  
 Yes = 1 No = 0 Needs Improvement = .5

**Evaluator Notes:**

Typically yes. No HL SRCR's reported in CY2021. Verified in the WMS.

**14** Was the State responsive to: 1 1  
 Yes = 1 No = 0 Needs Improvement = .5  
 a. Surveys or information requests from NAPSR or PHMSA; and  
 b. PHMSA Work Management system tasks?

**Evaluator Notes:**

Yes. Reviewed responses to certain requests for data and Survey Monkey results. No HL IM notifications in CY2021.



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

Evaluator Notes:  
None issued in CY2021. None currently in effect.

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**16** Were pipeline program files well-organized and accessible? Info Only Info Only  
Info Only = No Points

Evaluator Notes:  
No issues. Records made readily available.

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**17** Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT). Has the state updated SICT data? 3 3  
Yes = 3 No = 0 Needs Improvement = 1-2

Evaluator Notes:  
Yes. No issues noted. Satisfied with estimates.

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**18** Discussion on State Program Performance Metrics found on Stakeholder Communication site. <http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805> Info Only Info Only  
Info Only = No Points

Evaluator Notes:  
Yes. Discussed performance metrics. No significant changes. The WUTC metrics appeared to be at reasonable performance levels. Excavation damages (Gas) per 1000 tickets (requested) continues to trend down since 2015 averaging approximately 2.9 damages in CY2020. Number of inspection days have increased to over 15 days per 1K miles of pipeline. HL inspector core training at 90% and five year retention currently at 90%.

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**19** Did the state encourage and promote operator implementation of Pipeline Safety Management Systems (PSMS), or API RP 1173? This holistic approach to improving pipeline safety includes the identification, prevention and remediation of safety hazards. Info Only Info Only  
Info Only = No Points

- a. <https://pipelinesms.org/>
- b. Reference AGA recommendation to members May 20, 2019

Evaluator Notes:  
The program promotes implementation of PSMS via operator meetings and as part of the Operator Annual Reviews (Refer to the WUTC's OAR Checklist).

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

Evaluator Notes:  
No issues identified. No point deduction under Part D.

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Total points scored for this section: 50  
Total possible points for this section: 50

- 1** Operator, Inspector, Location, Date and PHMSA Representative (enter specifics into the Info Only Info Only comments box below) Info Only Info Only  
 Info Only = No Points
- a. What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc)
  - b. When was the unit inspected last?
  - c. Was pipeline operator or representative present during inspection?
  - d. Effort should be made to observe newest state inspector with least experience

**Evaluator Notes:**

- a: A standard inspection and field review of BP-Olympic pipeline's Crude and Butane pipelines located in Ferndale, WA. Records were reviewed at the company's operations office located in Renton, WA.
- b: Last inspected in February/March 2019
- c: Yes
- d: Lex Vinsel has been with the WUTC pipeline program since 2004.

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

**Evaluator Notes:**

Yes. The inspector utilized the Inspection Assistant - WA state specific protocols for conducting the Standard and field observation inspections. A WUTC Field Data Collection form was used to record field facility checks, facility locations, and test equipment calibration data. The inspector had difficulty following the list of questions in the IA via his laptop often getting lost or skipping certain sections as he progressed.

- 3** Did the inspector adequately review the following during the inspection 10 5  
 Yes = 10 No = 0 Needs Improvement = 1-9
- a. Procedures (were the inspector's questions of the operator adequate to determine compliance?)
  - b. Records (did the inspector adequately review trends and ask in-depth questions?)
  - c. Field Activities/Facilities (did inspector ensure that procedures were being followed, including ensuring that properly calibrated equipment was used and OQ's were acceptable?)
  - d. Other (please comment)
  - e. Was the inspection of adequate length to properly perform the inspection?

**Evaluator Notes:**

- a. Procedures were not part of this inspection. Written procedures typically reviewed during the operator's annual review inspection.
- b. No. This inspection was intended to cover CY's 2019, 2020, and 2021. The inspector failed to review records related to ROW patrolling performed including ROW conditions, markers, crossings, and possible mitigation performed, if any. Only a cursory review of Public Awareness and Damage Prevention elements was conducted and not encompassing all CY's. Questions where the record review were not adequately reviewed were marked Satisfactory and were communicated to the operator the same during the exit interview. Five points deducted for not conducting an adequate records review to properly determine compliance.
- c. Facility site visit did cover most CP test sites except only two of the three CP rectifier installed on this system were visited. General ROW conditions and signage were observed. Instrument calibrations were checked on equipment used.
- d. The inspector was satisfied to allow the operator to lead him to whichever sites they wished to go instead of directing the inspection based on records reviewed and familiarizing himself with the system as part of the preplanning phase of this inspection.
- e. The time allotted for this inspection was of appropriate length to allow for a comprehensive evaluation which did not occur.

- 4** From your observation did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) 2 2  
 Yes = 2 No = 0 Needs Improvement = 1



Evaluator Notes:

None noted. There was no instance during this inspection that allowed for a proper determination if the inspector had any misunderstanding of the regulations or incorrectly stated the requirements of the regulations to the operator. Mr. Vinsel as been with the UTC Pipeline Safety program for 18 years.

- 5 Did the inspector conduct an exit interview, including identifying probable violations? (If inspection is not totally completed the interview should be based on areas covered during time of field evaluation) 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A exit interview was conducted at the end of the inspection. One area of concern was identified related to the field technician not properly following company procedures for taking a CP test read across a existing casing and the pipeline located inside.

- 6 Was inspection performed in a safe, positive, and constructive manner ? Info Only Info Only  
Info Only = No Points
  - a. No unsafe acts should be performed during inspection by the state inspector
  - b. What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)
  - c. Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)
  - d. Other

Evaluator Notes:

No unsafe acts were performed during this inspection. This was the first time Mr. Vinsel had inspected this unit. Better inspection pre-planning prior to engaging the operator would have provided useful system knowledge and made for a more streamlined and productive inspection by removing non applicable questions related to Non-CPM Leak Detection (none), Design and Construction (None), Pump Stations (None), Tank D&C (None constructed), Tanks and Storage (None).

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

Evaluator Notes:

E-3 Five points deducted for not conducting an adequate records review to properly determine compliance.

I communicated to both the UTC inspector and the Program Manager that any final inspection result determinations where records were not properly reviewed, should not be finalized until a proper review has been completed.

Total points scored for this section: 10  
Total possible points for this section: 15



**PART F - Damage prevention and Annual report analysis**

**Points(MAX) Score**

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

Evaluator Notes:

Yes. As in the past the UTC performs a Operator Annual Review utilizing a customized checklist. Information taken from these reviews are incorporated into the programs risk-based inspection scheduling model. The program also discuss detailed inspection/incident trends during their annual operator seminar.

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|----------|--|---|---|
| <b>2</b> | Has the state verified that the operators analyze excavation damages for the purpose of determining root causes and minimizing the possibility of a recurrence? (192.617)<br>Has the state verified that the operators have appropriately identified excavators who have repeatedly violated one-call laws and damaged their facilities. Have the operators taken steps to mitigate that risks? (192.1007)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

Yes. This is covered in their Annual Review Checklist Damage Prevention Data section, with additional elements from Q1 and Q2.

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|----------|--|-----------|-----------|
| <b>3</b> | Has the state reviewed the operator's annual report pertaining to Part D - Excavation Damage?<br>Info Only = No Points<br>a. Is the information complete and accurate with root cause numbers?<br>b. Has the state evaluated the causes for the damages listed under "One-Call Notification Practices Not Sufficient" (Part D.1.a.)?<br>c. Has the state evaluated the causes for the damages listed under "Locating Practices Not Sufficient" (Part D.1.b)? For each operator, does the state review the following?<br>d. Is the operator or its locating contractor(s) qualified and following written procedures for locating and marking facilities?<br>e. Is the operator appropriately requalifying locators to address performance deficiencies?<br>f. What is the number of damages resulting from mismarks?<br>g. What is the number of damages resulting from not locating within time requirements (no-shows)?<br>h. Is the operator appropriately addressing discovered mapping errors resulting in excavation damages?<br>i. Are mapping corrections timely and according to written procedures?<br>j. Has the state evaluated the causes for the damages listed under "Excavation Practices Not Sufficient" (Part D.1.c.)? | Info Only | Info Only |
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Evaluator Notes:

Items a thru j covered in the program's Annual Review Checklist Damage Prevention Data section, with additional elements from Q1 and Q2. No issues identified with Annual Report causal code information reported by HL operators.

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|----------|---|---|---|
| <b>4</b> | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests?<br>Yes = 2 No = 0 Needs Improvement = 1<br>a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.<br>b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages?<br>c. Has the state evaluated which of the following best describes the reason for the excavation damages; i.e., operator or contractor not following written procedures, failure to maintain marks, failure to support exposed facilities, failure to use hand tools were required, failure to test-hole (pot hole), improper backfilling practices, failure to maintain clearance or insufficient excavation practices.<br>d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages? | 2 | 2 |
|----------|---|---|---|



Evaluator Notes:

"Yes. No change from prior years. Mandatory reporting via the UTC's Virtual DIRT. Aggregated data is used to identify needs and trends. Results are posted on the UTC web site. This data and trending is also reflected on the Annual Review Checklist, and presented during their annual operator seminar. Outside of the annual review process, the program routinely works with operators when Annual Reports and DIRT reports are vague or do not demonstrate the level of detail they want from operators. Also present detailed trending at the annual operators meeting/seminar.

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5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues. No point deductions under Part F.

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



**PART G - Interstate Agent/Agreement States**

**Points(MAX) Score**

- 1** Were all inspections of interstate pipelines conducted using the Inspection Assistant program for documenting inspections? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

No independent inspections were conducted requiring immediate notification to PHMSA.

- 2** If inspections were conducted independent of a PHMSA team inspection was notice of all identified probable violations provided to PHMSA within 60 days? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

No independent inspections were conducted requiring immediate notification to PHMSA.

- 3** If inspections were conducted independent of a PHMSA team inspection was PHMSA immediately notified of conditions which may pose an immediate safety hazard to the public or environment? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

No independent inspections were conducted requiring immediate notification to PHMSA.

- 4** If inspections were conducted independent of a PHMSA team inspection did the state coordinate with PHMSA if inspections not were not included in the PHMSA Inspection Work Plan? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

The program performed field site-visits involving two IM anomaly digs (Phillips 66 & Trans Mountain). One SRCR (BP-Olympic)

- 5** Did the state take direction from and cooperate with PHMSA for all incident investigations conducted on interstate pipelines? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

Yes. One SRCR reported and investigated in CY2021. No interstate incidents reported in CY2021.

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

Evaluator Notes:

No issues.

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

