



## 2009 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



2009 Hazardous Liquid State Program Evaluation -- CY 2009  
Hazardous Liquid

**State Agency:** Washington

**Agency Status:**

**Date of Visit:** 04/21/2010 - 04/22/2010

**Agency Representative:** David Lykken, Pipeline Safety Director  
Steven King, Director Safety & Consumer Protection  
Joe Subsits, Chief Engineer  
Jim Fernald, Operations Manager  
Alan Lundeen, Policy & Outreach Manager

**Rating:**

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

**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 South Evergreen Park Drive SW, PO Box 47250  
**City/State/Zip:** Olympia, WA 98502

**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 2009 (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**

<b>PARTS</b>	<b>Possible Points</b>	<b>Points Scored</b>
A General Program Qualifications	26	26
B Inspections and Compliance - Procedures/Records/Performance	23.5	22.8
C Interstate Agent States	6	6
D Accident Investigations	5.5	5.5
E Damage Prevention Initiatives	9	8
F Field Inspection	12	12
G PHMSA Initiatives - Strategic Plan	9.5	9.5
H Miscellaneous	3	3
I Program Initiatives	9	9
<b>TOTALS</b>	<b>103.5</b>	<b>101.8</b>
<b>State Rating</b> .....		<b>98.4</b>

# PART A - General Program Qualifications

Points(MAX) Score

<b>1</b>	<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"> <li>a. State Jurisdiction and agent status over Hazardous Liquid and CO2 facilities (1) <input checked="" type="checkbox"/></li> <li>b. Total state inspection activity (2) <input checked="" type="checkbox"/></li> <li>c. Hazardous Liquid facilities subject to state safety jurisdiction (3) <input checked="" type="checkbox"/></li> <li>d. Hazardous Liquid pipeline incidents (4) <input checked="" type="checkbox"/></li> <li>e. State compliance actions (5) <input checked="" type="checkbox"/></li> <li>f. State record maintenance and reporting (6) <input checked="" type="checkbox"/></li> <li>g. State employees directly involved in the Hazardous Liquid pipeline safety program (7) <input checked="" type="checkbox"/></li> <li>h. State compliance with Federal requirements (8) <input checked="" type="checkbox"/></li> </ul>	8	8
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SLR Notes:

<b>2</b>	<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.

<b>3</b>	<p>Has the state held a pipeline safety T &amp; Q seminar(s) in the last 3 years? (NOTE: Indicate date of last seminar or if state requested seminar, but T&amp;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, last seminar conducted in calendar year 2008, May 13-15 in Seattle, WA. WUTC plans to conduct a hazardous liquid seminar in 2011 with the cooperation of T&Q and other potential presenters.

<b>4</b>	<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 WUTC's Pipeline Safety Data Base program on inspections performed by his staff with David Lykken. The program was easy to understand and well maintained. A review of individual file folders and information on inspections performed on the operator was organized in an individual file folder. A review of WUTC's record center found original files and other information relative to the inspection or investigation of accidents to be in a safe and well maintained location under a secure environment.

<b>5</b>	<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 prior to assuming the Director, Pipeline Safety position in November, 2009.

<b>6</b>	<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	1
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SLR Notes:

Yes, No response necessary. David Lykken responded to Tom Finch's letter dated December 21, 2009 pertaining to areas of improvement on December 30, 2009. All areas of improvement have been corrected or steps are being taken to complete in the coming months.

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

SLR Notes:

No action was required because letter to WUTC Chairman did not request a response. Yes, previous action requested in letters has been corrected.

## 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 WUTC pipeline safety engineers have completed the three year requirement courses except Stephanie Zuehlke who has completed six T&Q courses and under the three year time schedule. She completed course PL3291 in 09/2009 and scheduled to attend the remaining courses in 2010. Currently, she is attending the OQ seminar in Denver this week, pigging class in June & ECDA class in Sept, 2010.

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

For State Personnel:

On October 13, 2009 staff attended a Shoring/Excavation Safety class conducted by the state Labor & Industry Office. All Engineers except one attended the training. Listed below are the individuals that attended: Kuang Chu, Lex Vinsel, Alan Lundeen, Stephanie Zuehlke, Scott Rukke, Jim Fernald, Anne Soiza and Al Jones. Stephanie Zuehlke also attended Hazwoper training in January 12-16, 2009.

For Operators:

None

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

Key staff attended the Citizens Committee on Pipeline Safety meetings in part to provide educate to members on pipeline safety related issues and general pipeline 101 information.

SLR Notes:

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

SLR Notes:

Yes, all Engineers have completed the required T&Q courses and computer based training before conducting OQ inspections.

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

SLR Notes:

Yes, Joe Subsits, Al Jones and Chu Kuang are the leads and have completed all required T&Q Integrity Management (IMP) Courses/Seminars and CBT before conducting IMP Inspections.

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

A. Total Inspection Person Days (Attachment 2):

60.50

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

220 X 0.64 = 140.80

Ratio: A / B

60.50 / 140.80 = 0.43

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

Points = 5

SLR Notes:

Yes, A. 60.5 total inspection person days: B: (220 x .64=140.8)  
A/B= 60.5/140.8= 0.42968 meets the large amount of .38 requirement.

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**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:**

No. However, if approval is granted by Washington State Legislature in 2011 they will grow the program by one or two engineers to pick up damage prevention enforcement. It is anticipated the retirement of one engineer in 2010 and the position will be filled with the approval of WUTC's Human Resource office.

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

**SLR Notes:**

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



**PART B - Inspections and Compliance - Procedures/Records/ Performance** Points(MAX) Score

**Inspection Procedures**

<b>1</b>	Does the State have a written inspection plan to complete the following? (all types of operators) (Chapter 5.1) Previous Question B.1 + Chapter 5 Changes Yes = 6.5 No = 0 Needs Improvement = 50% Deduction	6.5	5.75
a	Standard Inspections (Including LNG) (Max points = 2)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
b	IMP Inspections (Including DIMP) (Max points = .5)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
c	OQ Inspections (Max points = .5)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
d	Damage Prevention (Max points = .5)	Yes <input type="radio"/>	No <input type="radio"/> Needs Improvement <input checked="" type="radio"/>
e	On-Site Operator Training (Max points = .5)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
f	Construction Inspections (Max points = .5)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
g	Incident/Accident Investigations (Max points = 1)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
h	Compliance Follow-up (Max points = 1)	Yes <input type="radio"/>	No <input type="radio"/> Needs Improvement <input checked="" type="radio"/>

**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, Needs improvement, Section 31 (Under development)
- e: Yes, Section 27 (Operator Training & Technical Assistance) ? Has been developed and effective date is Feb. 1, 2010. This was one of the items mentioned in Tom Finch's letter.
- f: Yes, Section 21
- g: Yes, Section 19, OPS Failure Investigation Policy and Section 20, Major Incident/Accident Response
- h: Yes, Needs improvement, Section 26 Compliance Follow-up (Under development)

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

**SLR Notes:**

Yes, in WUTC's Inspection Manual Section 13, Inspection Scheduling & Prioritization address the procedures for selecting operators.

**Inspection Performance**

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

Yes. WUTC has inspected (eleven hazardous liquid operators) to meet their Procedures for Prioritizing Operator Inspections schedule as described in section 13.

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

Yes. A review of the inspections forms indicated all items in the federal inspection document match their forms.

<b>5</b>	Did state complete all applicable portions of inspection forms? (Chapter 5.1 (3)) Previous Question B.6 Yes = 1 No = 0	1	1
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**SLR Notes:**

WUTC has included there commission rules with the federal regulations on their inspection forms. The forms were found to be complete and being used by staff members in the performance of their work.

<b>6</b>	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 2009.

<b>7</b>	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.

<b>8</b>	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, WTUC has reviewed Exxon Mobile Company's procedures to determine if they meet the requirements established in their rules and regulations. A review of the accident that occurred on Exxon Mobile facility in 2008 shows the company did perform the required analysis and determined the cause of the accident.

<b>9</b>	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 system identifies environmentally sensitive areas that traversed by or adjacent to hazardous liquid pipelines which operate in the State of Washington. The mapping system provides updated data on these areas and can print the location(s) map for use by WTUC engineers.

<b>10</b>	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, the state has reviewed the 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). This information is covered in WUTC's Intrastate Hazardous Liquid Pipeline System Form G-2.

## Compliance - 60105(a) States

<b>11</b>	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 probable violations cited against PB Pipeline North America on 5/3/09 was checked. The documentation was followed in accordance with their procedures.

<b>12</b>	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 information is completed and described in WUTC Pipeline Safety Policy & Procedures, Section 34, Safety & Consumer Protection Division Compliance & Enforcement Manual.

<b>13</b>	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 information is completed and described in WUTC Pipeline Safety Policy & Procedures in Section 34, Safety & Consumer Protection Division Compliance & Enforcement Manual, pages 49 thru 65.

<b>14</b>	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 this process in detail and requires them to routinely review the progress of compliance actions to prevent delays or breakdowns of the enforcement process. They have a ticker system within their email servicer that alerts the Director & Chief Engineer about compliance actions.

<b>15</b>	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. The State issued compliance action on probable violations discovered on the Sea TAC Fuel Facilities, LLC on 1/6/09. A review of the report indicated the agency is following its policies and procedures.

<b>16</b>	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, WUTC Pipeline Safety Policy & Procedures in Section 26, Compliance Follow-up Inspection is under development but they do perform this requirement via the standard inspection guidelines.

<b>17</b>	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:**

N/A. No hearing or show cause was issued in 2009.

<b>18</b>	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 their files indicated WUTC adequately documented the Sea Tac Fuel Facilities, LLC violations by sending a letter to the company officer. The violations were resolved by meetings with company officers and an agreement to comply with WUTC rules and regulations.

<b>19</b>	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 good example of this compliance action was found in the letter sent to Frank J. Grolimund, Vice-President, and Operations with Swissport Fueling, Inc.

<b>20</b>	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 & Procedures in Section 34, Safety & Consumer Protection Division Compliance & Enforcement Manual.

## Compliance - 60106(a) States

<b>21</b>	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:

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**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:

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**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:

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**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:

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**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:

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

SLR Notes:

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Total points scored for this section: 22.75  
Total possible points for this section: 23.5



# PART C - Interstate Agent States

Points(MAX) Score

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

SLR Notes:

Yes, they use PHMSA federal documents for their inspection activities.

**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 entered into SMART by PHMSA Region. Information on interstate inspection units is located on David Lykken's spreadsheet and well documented with inspection units and items found in non-compliance.

**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, information is submitted by WUTC to PHMSA within thirty days.

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

SLR Notes:

Yes, probable violations identified by state were referred to PHMSA for compliance against Kinder Morgan on 11/02/09 and Chevron Pipe Line Company on 09/02/09. These items were referred to PHMSA Western Region office within WUTC's thirty day required time schedule.

**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:

N/A. No imminent safety hazardous leaks or danger to the public were reported in 2009.

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

SLR Notes:

Yes, information on probable violations are submitted by WUTC to PHMSA within thirty days via email messages or letter.

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

SLR Notes:

Yes, WUTC submits documentation to support compliance action by PHMSA on probable violations along with the federal reporting form. Information is submitted in a timely manner and in accordance to WUTC policy and procedures manual.

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

SLR Notes:

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

# PART D - 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, WTUC state personnel are following the procedures for Federal/State cooperation in case of an accident in my review of the release of 1.5 bbl of product by BP Pipelines North America on 5/3/09.

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

**SLR Notes:**

Yes, Joe Subsits, Chief Engineer, responded to my question pertaining to the jurisdictional authority and Memorandum of Understanding between NTSB and PHMSA by explaining the document's purpose. He provided me a copy of the document which was located in his office and found in the appendix of the 2009 Guidelines for States Participating in the Pipeline Safety Program.

- 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, one hazardous liquid incident report was made in 2009 and it was found in WUTC's file folder. The requirement for reporting leaks and other damages that occur on the operator's facilities is covered under WUTC Rule WAC 480-75-630 Incident Reporting.

- 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 BP Pipelines North at 14879 Ovenell Road in Mount Vernon, WA in 2009 because information about the accident was obtained by telephone calls received and made to the operator. Information 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 reviewed in the files and folders indicate the investigations performed were thorough and conclusive with findings of facts.

- 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 2009. Therefore, no state initiated enforcement action was taken.

- 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 2009. Therefore, no state initiated enforcement or follow-up action was taken.

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

SLR Notes:

---

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



# PART E - Damage Prevention Initiatives

Points(MAX) Score

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

**SLR Notes:**

Yes. WUTC reviewed the 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. A review of WUTC Form G1, Standard Liquid Inspection - Procedures and Plan Review, section 202, page 18 of 23 show this information is included in their review.

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

**SLR Notes:**

Yes, this requirement pertaining to the operators to follow the written procedures on notification of excavation, marking, positive response and the availability and use of the one call systems 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.

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

**SLR Notes:**

Yes, WUTC staff members are encouraging stakeholder groups at local and regional meetings to use the Common Ground Alliance Best Practices document as a means to prevention damages from occurring to underground facilities. Alan Lundeen is working closely with several stakeholder groups in proposing changes in their state damage prevention law to have WUTC be the enforcement agency.

- |          |   |   |   |
|----------|---|---|---|
| <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? New 2008<br>Yes = 1 No = 0 | 1 | 0 |
|----------|---|---|---|

**SLR Notes:**

WUTC has not collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests for hazardous liquid operators. They have implemented the Virtual DIRT program which will be of assistance in obtaining this information in the future. They anticipate having to go to rulemaking to require the hazardous liquid operators to submit this information.

- |          |   |   |   |
|----------|---|---|---|
| <b>5</b> | 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)?<br>Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

**SLR Notes:**

Yes, this item is in their accident and failure reporting forms. Also, this information is located on their Standard Inspection Report for Intrastate Hazardous Liquid Systems Records Review and Field Inspection form G-2.

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

**SLR Notes:**

Total points scored for this section: 8  
Total possible points for this section: 9



<b>1</b>	Operator, Inspector, Location, Date and PHMSA Representative	Info Only	Info Only
	Info Only = No Points		
	Name of Operator Inspected: McChord Pipeline Company		
	Name of State Inspector(s) Observed: Al Jones, Pipeline Safety Engineer		
	Location of Inspection: Tacoma, WA		
	Date of Inspection: May 17-18, 2010		
	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 Al Jones. Pipeline Safety Engineer with the Washington Utilities and Transportation Commission. Rich Smith, Manager, Engineering US Oil & Refining Company, Harvey Van, Manager Operations, US Oil & Refining Company, Corey Herrick, Chief Engineer, McChord Pipeline Company, John Williamson, Senior Inspector, McChord Pipeline Company, and Marcia Nielsen, Manage Administrative Services, US Oil & Refining Company. The hazardous liquid pipeline was constructed and installed in 1966 by Pipeline Service Corporation. In 1967, Buckeye Pipe Line purchased the pipeline and operated the line until 1996 when it was purchased by McChord Pipeline Company. US Oil & Refining Company owns and operates McChord Pipeline Company. The 14.25 mile, 6 inch coat tar, 0.188 wall, API 5L grade B pipeline is the sole source of jet fuel to McChord Air force Base in Tacoma, WA. The pipeline has three isolated valves, one check valve and operates at 21% of SMYS. Maximum allowable operating pressure is 720 psig and MOP of 450 psig. The pipeline was hydro-tested after it was purchased in 1996 and a MFL smart pigged is conducted every five years. The last MFL smart pigging was performed in 2009. Five defects were found during the pigging and corrective action was taken within 60 days of detection. A close interval survey is performed every 5 years on the pipeline. The last survey was performed in 2009 found no low readings. The pipeline crosses several interstate highways including I-5 and four bodies of water. Jet fuel is provided to McChord Air force Base three times a week with approximately 7,000 bbl being transferred within 8 hrs. No leaks have occurred on the pipeline in the 43 years of service.

<b>2</b>	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:**

The operator was notified six weeks in advance of the inspection and provided the hazardous liquid standard inspection forms, Washington UTC forms G-1 and G-2. Al Jones used the forms which did include questions pertaining to the operator's drug and alcohol compliance to PHMSA rules and regulations.

<b>3</b>	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, Al Jones used the WUTC Standard Inspection Report for Intrastate Hazardous Liquid Systems Procedures & Plan Review form G-1 & WUTC Standard Inspection Report for Intrastate Hazardous Liquid Systems Records Review & Field Inspection form G-2. These forms were used in progressing through the inspection and insure a complete review of the pipeline safety regulations and Washington state commission rules was performed.

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

**SLR Notes:**

The form 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. No violations were found or cited during this inspection.

<b>5</b>	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. Al Jones reviewed the operator's maps on test station and rectifier locations along with the valve keys used to turn valves. During the field inspection, Al Jones took pipe to soil readings at each test station and rectifier location and found no low readings.

<b>6</b>	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:**

Al Jones conducted a Standard Inspection using Utilities and Transportation Commission Standard Report for Intrastate Hazardous Liquid Systems Procedures and Plan Review, Form GS-1 and Utilities and Transportation Commission Standard Report for Intrastate Hazardous Liquid Systems Records and Field Inspection, Form GS-2.

- |          |  |   |                                     |
|----------|--|---|-------------------------------------|
| <b>7</b> | 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<br>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:**

Al Jones was observed two of the three days required to perform the inspection. On the first day, Mr. Jones was observed reviewing the operations and maintenance records and drug and alcohol procedures for compliance with federal and state regulations. On the second day, Mr. Jones was observed inspecting the control center, pipeline markers, recording pipe-to-soil potential readings at random locations along the pipeline including inlet and outlet voltage readings at each rectifier and turning of one emergency valve. At Al Jones request, we reviewed the items of concern and recommendations to the operator at the end of the second day. The final records review portion or exit interview with the operator would continue the next day after the observation.

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

**SLR Notes:**

Yes. Al Jones has extensive knowledge in hazardous liquid pipeline operations and maintenance working in the private sector before coming to work at the Washington Utilities and Transportation Commission. He demonstrated a good working knowledge pertaining to Parts 195 & 199 of the pipeline safety regulations.

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

**SLR Notes:**

Yes. Al Jones discussed with the operator each day during the review areas of improvement or concerns pertaining to the pipeline safety regulations or Washington UTC rules. He mentioned to the operator on the first day, an exit interview would be performed on the last day of the inspection visit.

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

**SLR Notes:**

No violations were found or cited during this standard inspection visit. However, two previous violations were cited against the company on September 3, 2009 for failure to prepare and follow a qualified welding procedure and maintain qualified records. Information provided in correspondence from operator to Dave Lykken and during this inspection visit resulted in the violations being closed.

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

**SLR Notes:**

McChord Pipeline personnel were observed in the control room monitoring the transfer of jet fuel to McChord Air force base, opening valve boxes, turning valves and checking rectifier readings in the Tacoma and McChord Air force base.

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

**SLR Notes:**

McChord Pipeline Company conducted a public awareness campaign in 2009 by requesting their residential customers along the pipeline to complete a survey form. The survey form had several questions about call before you dig and reporting emergency situations or other unusual activities around their pipeline. The survey cards were place in a drawing. The winner, Penny, received a gift certificate, VISA \$200 credit card. McChord Pipeline Company officials plan to conduct another survey in 2010.

- |           |  |           |                          |
|-----------|--|-----------|--------------------------|
| <b>13</b> | Field Observation Areas Observed (check all that apply)<br>Info Only = No Points | Info Only | Info Only                |
|           | a. Abandonment   |           | <input type="checkbox"/> |



- b. Abnormal Operations
- c. Break-Out Tanks
- d. Compressor or Pump Stations
- e. Change in Class Location
- f. Casings
- g. Cathodic Protection
- h. Cast-iron Replacement
- i. Damage Prevention
- j. Deactivation
- k. Emergency Procedures
- l. Inspection of Right-of-Way
- m. Line Markers
- n. Liaison with Public Officials
- o. Leak Surveys
- p. MOP
- q. MAOP
- r. Moving Pipe
- s. New Construction
- t. Navigable Waterway Crossings
- u. Odorization
- v. Overpressure Safety Devices
- w. Plastic Pipe Installation
- x. Public Education
- y. Purging
- z. Prevention of Accidental Ignition
- A. Repairs
- B. Signs
- C. Tapping
- D. Valve Maintenance
- E. Vault Maintenance
- F. Welding
- G. OQ - Operator Qualification
- H. Compliance Follow-up
- I. Atmospheric Corrosion
- J. Other

**SLR Notes:**

McChord Pipeline Company's 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, pipeline markers, valve maintenance and operator qualifications were observed during the field inspection.

**14** Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

**SLR Notes:**

Al Jones performed a thorough inspection, asked good questions, respectful of the operator's comments and provided information on the drug and alcohol regulations requested by the operator .

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

**Risk base Inspections - Targeting High Risk Areas**

**1** Does state have process to identify high risk inspection units? 1.5 1.5  
 Yes = 1.5 No = 0

Risk Factors (criteria) to consider may include:

Miles of HCA's, Geographic area, Population Density

Length of time since last inspection

History of Individual Operator units (leakage, incident and compliance history, etc.)

Threats - (Excavation Damage, Corrosion, Natural Forces, Other Outside Forces, Material or Welds, Equipment, Operations, Other)

**SLR Notes:**

Yes, WUTC maintains a GIS mapping system on the location of all pipelines in Washington State that is used in establishing their inspection reviews. They review HCA with the use of the GIS mapping. 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, inspection units are developed based on PHMSA's Guidelines for State Participating in the Pipeline Safety Program; review of annual reports submitted by operators and input for staff members.

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

**SLR Notes:**

Yes, they are ranked and reviewed in accordance to high risk areas and information on the GIS mapping data.

**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 are encouraging Hazardous Liquid operators to file data into their Virtual DIRT program. They may need to go to rule making to obtain full participation by all operators.

**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 also 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, they review leakage, reduction or installation of pipe and components in the system, unaccounted for gas loss and miles of cathodic protection on operator's annual reports for trend and operator issues.

**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. They share their reviews and other information on these accidents with PHMSA Western Region office personnel.

**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 use the GMAP, General Management Accountability and Performance as a means to evaluate the effectiveness of their program. This document is submitted to the WUTC Chairman and Governor for their review and comments.

---

<b>9</b>	Did the State input all operator qualification inspection results into web based database provided by PHMSA in a timely manner upon completion of OQ inspections? <small>Yes = .5 No = 0</small>	.5	0.5
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**SLR Notes:**

Yes, this information has been entered after each inspection performed by WUTC staff members into the web based database provided by PHMSA in a timely manner. This information is contained on all standard inspection forms page 7 of 10.

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<b>10</b>	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:**

N/A WUTC was not required to reply to the Integrity Management Database because operators did not submit information in 2009 about their programs.

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<b>11</b>	Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17 <small>Yes = .5 No = 0</small>	.5	0.5
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**SLR Notes:**

Yes, this information is entered and available on the Hazardous Liquid IMP Field Verification Inspection form. A review of Chevron Pipe Line Company inspection report on 9/2/09 and BP Olympia Pipe Line Company on 6/1/09 and Exxon Mobil Corporation on 10/5/09 found the information was recorded correctly.

---

<b>12</b>	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
-----------	---	----	-----

**SLR Notes:**

Yes, they use the federal protocols when they conduct the integrity management program inspections.

---

<b>13</b>	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
-----------	--	----	-----

**SLR Notes:**

Yes, this information is located in their Standard Inspection Report for Intrastate Hazardous Liquid Systems on page 2 of 10, Section 8. WUTC sent a letter to each operator reminding them about submitting and updating the NPMS information.

---

## Accident/Incident Investigation Learning and Sharing Lessons Learned

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

**SLR Notes:**

Yes, information is shared and discussed with NAPSRS members informatively and during the NAPSRS Western Region meeting.

---

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

**SLR Notes:**

Yes, WUTC supports data gathering efforts concerning accidents and shares information about these accidents with PHMSA and NAPSRS members at the NAPSRS Western Region meeting.

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

**SLR Notes:**

Yes, after the NOPV is issued for an incident they conduct a root cause analysis.

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

**SLR Notes:**

Yes, they use the training and information presented at the T&Q course on root cause analysis to review all incidents and accidents that have occurred in their state. Some of this information is on their accident investigation form.

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**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, the following individuals attended the T&Q root cause course: Al Jones on 2/13/09: Joe Subsits and Scott Rukke in Denver, CO on 4/5/10. The more senior engineers will be attending this course in the coming months.

---

## 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 list server available to all operators and individuals who want to subscribe and receive information from their organization about their inspection program and other initiatives. Additional information about their accomplishments and goals in making improvements in damage prevention and who they regulate is available on WUTC's website.

---

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

**SLR Notes:**

Yes, WUTC shares information about their enforcement data against operators under their jurisdictional authority on their website location.

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

**SLR Notes:**

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Total points scored for this section: 9.5  
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:**

David Lykken serves on the ASME B31 Q committee, Plastic Pipe Ad Hoc committee, APGA Security and Integrity Foundation Board representing the NAPS R organization. Kuang Chu is a member on the ASME B31.4/11 Liquid and Slurry Piping Transportation Systems and serves on the GTI Leak-Rupture Boundary Study Committee.

Damage Prevention initiative during calendar year 2009 include the following:

Governor issued proclamations, Damage Prevention Month (May 2009) & Pipeline Safety Day (June 10, 2009) in recognition of the 10th anniversary of the Bellingham incident.

WUTC staff appearance on Seattle gardening show (Radio), and Consumer News segment on Seattle TV station.

Seattle Times op-ed piece written by WUTC Chairman Jeff Goltz highlighting damage prevention initiative and work done by commission pipeline safety program.

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.

Formed Dig law stakeholder workgroup and conducted meetings in an effort to make improvements to the WA damage prevention program as part of meeting the nine elements of the PIPES Act of 2006.

- 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:**

Yes, several damage prevention initiatives are underway in discussions with stakeholder groups to change the state law to allow WUTC to become the enforcement agency for the state damage prevention law. WUTC has conducted several stakeholder meetings about the use of the Virtual DIRT program to encourage operators to file information about their damages into this program. Changes that occurred in 2007 on the definition of flammable gas resulted in WUTC assuming jurisdictional authority of hydrogen and propane pipelines.

- 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:**

They continue to use the GIS mapping system as a method of locating HCA's and reviewing elevation areas where the pipeline may have potential internal corrosion problems.

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

**SLR Notes:**

Yes, they have and continue to response to all PHMSA and NAPS R surveys.

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

**SLR Notes:**

WTUC staff and program manager 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 an operator who operates in each state. This was valuable information to each state agency in making sure consistent enforcement was being maintained on the operator. David Lykken has provided WTUC's job classifications and descriptions to Paul Metro with the Pennsylvania Public Service Commission to assist in the development of new positions for the Pennsylvania natural gas or hazardous liquid safety programs

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

**SLR Notes:**

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)

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

SLR Notes:

Yes, WUTC has performed and verified the operator's drug and alcohol testing since 2000. PSE was cited in 2000 for violation of the drug and alcohol testing rule and this action resulted in collection of a large penalty from the operator in 2001. David Lykken would like to see training in the enforcement of 199 parts 40 and how to use the forms correctly.

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

SLR Notes:

Yes, they perform and check this item in their O&M Headquarters Inspection document which is a part of their WUTC D&A inspection forms.

- |          |   |    |     |
|----------|---|----|-----|
| <b>3</b> | Is the state verifying that any positive tests are responded to in accordance with the operator's program?<br>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).

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

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | Has the state verified that operators have a written qualification program?<br>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.

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

SLR Notes:

Yes, they verify this information and insure the operator's qualification programs complies with PHMSA rules and protocols on each inspection performed.

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

SLR Notes:

Yes, this item is listed on the Federal form and Field Inspection Protocol Form sheet. A review of the inspections performed on ExxonMobil in Spokane Terminal, BP Olympia Pipe Line Company in Western Washington, Chevron Pipe Line Company in Pasco, WA, Kinder Morgan in Whatcom and Shagit Counties and Sea-Tac in Seattle, WA found the information correctly entered and indicated the state did verify those persons who perform covered tasks are qualified in accordance with the company's program.

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

SLR Notes:

Yes, during the field inspection 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)

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

SLR Notes:

Yes, all operators who have HCA's are required to have an IMP program and this information has been verified by WUTC with the operator or thorough the GIS mapping system.

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

**SLR Notes:**

Yes, WUTC has verified thorough the GIA mapping and other information provided by the operator that an IMP plan was required and was properly applied in the high consequence areas.

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

**SLR Notes:**

Yes, WUTC has reviewed each operator's IMP and found it meets the requirements of the regulations.

**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? .5 0.5  
Yes = .5 No = 0

**SLR Notes:**

Yes, this item is included their IMP field verification program contained in the standard inspection form.

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

**SLR Notes:**

Yes, this information is checked in the field verification and GIS updates.

### 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)? .5 0.5  
Yes = .5 No = 0

**SLR Notes:**

Yes, these items are checked on their Standard Inspection Report for Intrastate Hazardous Liquid System Records Review & Field Inspection Form G-2, Section 77.

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

**SLR Notes:**

Yes, WUTC has reviewed the contents of the operator's programs for compliance with 195.440 by participating and entering information via the Clearinghouse.

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

**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 Info Only  
Info Only = No Points

**SLR Notes:**

Yes, this information is reviewed in WUTC's inspection forms. WUTC staff also contact and discuss with first responders about public awareness items to insure this information is being provided to them by the operator.

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

**SLR Notes:**

Total points scored for this section: 9



