



2011 Hazardous Liquid State Program Evaluation

for

MISSISSIPPI PUBLIC SERVICE COMMISSION

Document Legend

PART:

- O -- Representative Date and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- Program Performance
- D -- Compliance Activities
- E -- Accident Investigations
- F -- Damage Prevention
- G -- Field Inspections
- H -- Interstate Agent State (if applicable)
- I -- 60106 Agreement State (if applicable)



2011 Hazardous Liquid State Program Evaluation -- CY 2011
Hazardous Liquid

State Agency: Mississippi

Rating:

Agency Status:

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

Date of Visit: 04/16/2012 - 04/20/2012

Agency Representative: Mark McCarver, Director Pipeline Safety

PHMSA Representative: Don Martin, State Programs Division

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

Name/Title: Leonard Bentz, Chairman
Agency: Mississippi Public Service Commission
Address: 501 North West Street, Suite 201a
City/State/Zip: Jackson, Mississippi 39201

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 2011 (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 progress report attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART G):

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 G, the PHMSA representative should include a written summary which thoroughly documents the inspection.

Scoring Summary

PARTS	Possible Points	Points Scored
A Progress Report and Program Documentation Review	10	10
B Program Inspection Procedures	15	15
C Program Performance	43	43
D Compliance Activities	6	6
E Accident Investigations	2	2
F Damage Prevention	8	8
G Field Inspections	0	0
H Interstate Agent State (if applicable)	0	0
I 60106 Agreement State (if applicable)	2	2
TOTALS	86	86
State Rating		100.0

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- | Item | Description | Points(MAX) | Score |
|------|---|-------------|-------|
| 1 | Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1 (A1a)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |

Evaluator Notes:

Yes. The MPSC correctly stated that has 60106 authority.

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| 2 | Review of Inspection Days for accuracy - Progress Report Attachment 2 (A1b)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

The MPSC's database maintains operator and inspection unit information. The database compiles the information for entry into the annual progress report. No issues were found.

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| 3 | Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3 (A1c)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

The operator and inspection unit information was consistent with the information kept in the MPSC's files. No issues found.

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| 4 | Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4 (A1d)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

The MPSC correctly showed that no accidents were reported on Attachment 4.

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| 5 | Accuracy verification of Compliance Activities - Progress Report Attachment 5 (A1e)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Upon a review of the inspection files no probable violations were found. The MPSC did not report any probable violations on Attachment 5.

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|---|---|---|---|
| 6 | Were pipeline program files well-organized and accessible? - Progress Report Attachment 6 (A1f, A4)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

It was not easy to locate an inspection file for a certain year under each operator. It is recommended that the MPSC either establish an inspection report naming convention or organize the inspection report files by year under each operator.

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| 7 | Was employee listing and completed training accurate and complete? - Progress Report Attachment 7 (A1g)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

The employee listing was complete and accurate. Completed training information was downloaded from Training and Qualifications database.

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|---|---|---|---|
| 8 | Verification of Part 195,198,199 Rules and Amendments - Progress Report Attachment 8 (A1h)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

No issues found outside of previously communicated lack of statutory language for authority over hazardous liquid pipelines.



9 List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10 (H1-3) 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No issues identified.

10 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The MPSC has generally complied with the requirements of Part A of this evaluation. The MPSC will not be inspecting hazardous liquid pipelines after 12/31/2011. If the MPSC decides to obtain certification or an agreement for hazardous liquids it is recommended that the MPSC either establish an inspection report naming convention or organize the inspection report files by year under each operator.

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



PART B - Program Inspection Procedures

Points(MAX) Score

1 Standard Inspections (B1a) 2 2
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:
 The MPSC has identified its inspection frequencies in its operation procedures. Standard inspections will be scheduled based upon risk analysis but not to exceed once every two years.

2 IMP Inspections (B1b) 1 1
 Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
 The MPSC's Operation Manual does not explicitly address IMP inspections but can be a part of the Comprehensive inspection. The MPSC should include more detailed description of IMP inspections and the frequency at which it will conduct them.

3 OQ Inspections (B1c) 1 1
 Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
 The MPSC has completed the review of operator's initial OQ Plans. The MPSC's Operation Manual states they will be conducted on an as needed basis such as new operators or plan revisions made by an operator. Protocol 9 - Field inspections are conducted as part of the Comprehensive Inspection (Standard).

4 Damage Prevention Inspections (B1d) 1 1
 Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
 Are part of the Comprehensive Inspections (Standard).

5 On-Site Operator Training (B1e) 1 1
 Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
 The MPSC schedules Operator Training on an as needed basis.

6 Construction Inspections (B1f) 1 1
 Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
 The MPSC requires operators to provide official notice of pending construction projects. The MPSC's Operation Manual states a construction inspection will be scheduled upon receiving these notices.

7 Incident/Accident Investigations (B1g) 2 2
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:
 The MPSC's Operation Manual states that investigators will be sent to accident location as soon as notice is provided.

8 Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? (B2a-d, G1,2,4) 6 6
 Yes = 6 No = 0 Needs Improvement = 1-5

- | | | | | |
|----|---|--------------------------------------|--------------------------|---|
| a. | Length of time since last inspection | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Type of activity being undertaken by operators (i.e. construction) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. | Locations of operators inspection units being inspected - (HCA's, Geographic area, Population Density, etc) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |



- 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) Yes No Needs Improvement
- f. Are inspection units broken down appropriately? Yes No Needs Improvement

Evaluator Notes:

The MPSC's Operation Manual states that these factors will be considered in the scheduling of inspections. Comprehensive inspections of each operator will be completed once every two years. A review of the inspection units indicates that the units are appropriate.

9 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Question B.2 - The MPSC's Operation Manual does not explicitly address IMP inspections but can be a part of the Comprehensive inspection. The MPSC should include more detailed description of IMP inspections and the frequency at which it will conduct them. Since the MPSC will not be seeking a certification or agreement for hazardous liquid pipelines in 2012 this issue need not be addressed unless the MPSC requests certification or an agreement in the future.

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



PART C - Program Performance

Points(MAX) Score

- 1** Was ratio of Total Inspection person-days to total person days acceptable? 5 5
 Yes = 5 No = 0
 A. Total Inspection Person Days (Attachment 2):
 47.00
 B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
 220 X 0.15 = 33.00
 Ratio: A / B
 47.00 / 33.00 = 1.42
 If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0
 Points = 5

Evaluator Notes:
 Yes, the MPSC exceeded the required ratio of 0.38 (actual ratio was 1.42).

- 2** Has each inspector and program fulfilled the T Q Training Requirements? (See Guidelines for requirements) Chapter 4.4 (A8-A11, G19) 5 5
 Yes = 5 No = 0 Needs Improvement = 1-4
- a. Completion of Required OQ Training before conducting inspection as lead? Yes No Needs Improvement
 - b. Completion of Required IMP Training before conducting inspection as lead? Yes No Needs Improvement
 - c. Root Cause Training by at least one inspector/prgram manager? Yes No Needs Improvement
 - d. Note any outside training completed? Yes No Needs Improvement

Evaluator Notes:
 The MPSC assigns certain inspectors with hazardous liquid pipeline inspection responsibilities. All assigned inspectors met the training requirement. Mark McCarver has completed the required TQ classes. One inspector, Wiley Walker, has completed the root cause analysis training.

- 3** Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1 (A5) 2 2
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:
 Mr. McCarver has been the Director of Pipeline Safety since 2004. He exhibited good knowledge of the pipeline safety program and regulations.

- 4** 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 (A6-7) 2 2
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:
 The MPSC responded within 52 days. Deficiencies were discussed in the MPSC's response.

- 5** Did State hold PHMSA TQ Seminar in Past 3 Years? Chapter 8.5 (A3) 2 2
 Yes = 2 No = 0

Evaluator Notes:
 The MPSC conducts a joint seminar with Louisiana in July of each year. The last seminar was held in July, 2011.

- 6** Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1 (B3) 5 5
 Yes = 5 No = 0 Needs Improvement = 1-4

Evaluator Notes:
 Yes. The MPSC time intervals are established at once every two years. The MPSC inspected over 100% of the operators and inspection units during 2011.



7	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 (B4-5) Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

The MPSC uses the federal inspection forms.

8	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) (B7) Yes = 1 No = 0	1	1
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Evaluator Notes:

No issues since the MPSC completed the federal form which covers this requirement.

9	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) (B8) Yes = 1 No = 0	1	1
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Evaluator Notes:

No issues since the MPSC completed the federal form which covers this requirement.

10	Is the state aware of environmentally sensitive areas traversed by or adjacent to hazardous liquid pipelines? (reference Part 195, review of NPMS) (B9) Yes = 1 No = 0	1	1
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Evaluator Notes:

No issues identified. The MPSC discusses environmentally sensitive areas with the Mississippi Department of Environmental Quality. The MPSC uses this resource to confirm that operators have these areas noted in their Integrity Management Program.

11	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)? (B10,E5) Yes = 1 No = 0	1	1
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Evaluator Notes:

The MPSC covered this requirement when conducting standard inspections. The MPSC uses the federal inspection which covers this item.

12	Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues? Data Initiative (G5-8,G15) Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

Yes. The MPSC reviews the annual reports and requests operator to submit revisions if discrepancies are found.

13	Did state input all applicable OQ, IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1 (G9-12) Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

No issues identified.

14	Has state confirmed intrastate operators have submitted information into NPMS database along with changes made after original submission? (G13)	1	1
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

As part of the MPSC's standard inspection, the MPSC reviews the operator's submission of pipeline data to the NPMS database. The MPSC has also accessed the database and reviewed the pipelines shown in the database to verify that hazardous liquid pipelines in Mississippi are included.

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| 15 | Is the state verifying operators are conducting drug and alcohol tests as required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199 (I1-3)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

The MPSC did not conduct drug and alcohol plan inspections during 2011. The MPSC reviews drug and alcohol plan testing and follow up during its standard inspections.

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| 16 | Is state verifying operators OQ programs are up to date? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals determined in the operators plan. 49 CFR 195 Part G (I4-7)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

The MPSC checks for OQ program updates while conducting standard inspections.

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| 17 | Is state verifying operator's hazardous liquid integrity management (L IMP) Programs are up to date? This should include a previous review of LIMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 195.452 Appendix C (C8-12)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

The MPSC has completed Integrity Management Plan initial inspections for all operators that have hazardous liquid pipelines. On going IMP requirements are reviewed as part of the Comprehensive Inspections.

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| 18 | Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. 49 CFR 195.440 (I13-16)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

Yes. The Public Awareness program requirements are reviewed during standard inspections.

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| 19 | 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). (G19-20)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

The Commission's website contains a site for pipeline safety where announcements can be placed. The Commission has an online docket system where show cause cases can be accessed.

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| 20 | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 (B6)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

There were no Safety Related Condition Reports (SRC) in 2011.

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| 21 | Did the state participate in/respond to surveys or information requests from NAPS or PHMSA? (H4)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

No occurrences were found where the MPSC did not respond to surveys or information requests.

22 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

The MPSC has generally complied with the requirements in Part C of this evaluation.

Total points scored for this section: 43

Total possible points for this section: 43



PART D - Compliance Activities

Points(MAX) Score

- 1** Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1 (B12-14, B16, B1h) 4 4
 Yes = 4 No = 0 Needs Improvement = 1-3
- a. Procedures to notify an operator (company officer) when a noncompliance is identified Yes No Needs Improvement
- b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns Yes No Needs Improvement

Evaluator Notes:

The MPSC office procedures describe the steps to be taken until the probable violations are corrected. The MPSC issues a non-compliance notification to an operator when a probable violation is found. An operator is given 30 days to respond to the notice. Followup inspections are conducted to monitor the progress of corrective actions. Operators are given the opportunity to provide information showing that a probable violation did not occur or an opportunity to request a hearing before the Commissioners to argue that a probable violation did not occur. The MPSC maintains a database that shows the number of probable violations found in each inspection and the status of corrective action.

- 2** 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 (B11,B18,B19) 4 NA
 Yes = 4 No = 0 Needs Improvement = 1-3
- a. Were compliance actions sent to company officer or manager/board director if municipal/government system? Yes No Needs Improvement

Evaluator Notes:

Upon a review of randomly selected inspection report files there were no probable violations found during 2011.

- 3** Did the state issue compliance actions for all probable violations discovered? (B15) 2 NA
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Upon a review of randomly selected inspection report files there were no probable violations found during 2011.

- 4** Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary. (B17, B20) 2 NA
 Yes = 2 No = 0

Evaluator Notes:

Upon a review of randomly selected inspection report files there were no probable violations found during 2011.

- 5** Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken) (B27) 2 2
 Yes = 2 No = 0

Evaluator Notes:

The MPSC program manager, Mark McCarver, provided a verbal description of the process for imposing civil penalties. The process has not been used in a number of years. Civil penalties have not been issued for repeat violations.

- 6** Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations? (new question) Info Only Info Only
 Info Only = No Points

Evaluator Notes:

The state has not used its enforcement fining authority in a number of years.

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

Evaluator Notes:

Question D.5 - The MPSC has not issued a civil penalty in a number of years including any instance where a repeat violation



was discovered. If the MPSC seeks certification or an agreement in the future, the MPSC should develop criteria for the consideration of issuing a civil penalty including the discovery of any repeat violations.

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



PART E - Accident Investigations

Points(MAX) Score

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| 1 | Does state have adequate mechanism to receive and respond to operator reports of accidents, including after-hours reports? And did state keep adequate records of Incident/Accident notifications received? Chapter 6 (A2,D1-3)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| a. | Acknowledgement of MOU between NTSB and PHMSA (Appendix D) | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. | Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E) | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:
Yes. The MPSC is aware of the MOU and Federal/State Participation covered in the Guidelines. The MPSC provides a list of contact and telephone numbers to the operators. The MPSC maintains a log of incidents reported by operators.

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| 2 | If onsite investigation was not made, did state obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 (D4)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
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Evaluator Notes:
No accidents were reported by operators during 2011.

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|----------|--|---------------------------|--|
| 3 | Were all accidents investigated, thoroughly documented, and with conclusions and recommendations? (D5)
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | NA |
| a. | Observations and document review | Yes <input type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. | Contributing Factors | Yes <input type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| c. | Recommendations to prevent recurrences where appropriate | Yes <input type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:
No accidents were reported by operators during 2011.

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| 4 | Did the state initiate compliance action for violations found during any incident/accident investigation? (D6)
Yes = 1 No = 0 | 1 | NA |
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Evaluator Notes:
No accidents were reported by operators during 2011.

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| 5 | Did the state assist region office by taking appropriate follow-up actions related to the operator accident reports to ensure accuracy and final report has been received by PHMSA? (validate report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 (D7)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
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Evaluator Notes:
No accidents were reported by operators during 2011.

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|----------|---|---|----|
| 6 | Does state share lessons learned from incidents/accidents? (sharing information, such as: at NAPS Region meetings, state seminars, etc) (G15)
Yes = 1 No = 0 | 1 | NA |
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Evaluator Notes:
No accidents were reported by operators during 2011.

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| 7 | General Comments:
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

No accidents were reported by operators during 2011.

Total points scored for this section: 2
Total possible points for this section: 2



PART F - Damage Prevention

Points(MAX) Score

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|---|--|---|---|
| 1 | Has the state reviewed directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies? (E1)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

The MPSC covers this issue while using the federal inspection form during its standard inspection.

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| 2 | Did the state inspector check to assure the pipeline operator is following its written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? (E2)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

The MPSC verifies the operator is complying with this requirement while completing the federal inspectio form.

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| 3 | Did the state encourage and promote practices for reducing damages to all underground facilities to its regulated companies? (i.e. such as promoting/adopting the CGA Best Practices encouraging adoption of the 9 Elements, etc.) (E3)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

The MPSC has promoted the CGA Best Practices with operators has participated in an effort to convince the state legislature to incorporate the 9 elements into Mississippi damage prevention laws.

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| 4 | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests? (This can include DIRT and other data shared and reviewed by the pipeline safety program) (E4,G5)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

The MPSC has started collecting the damage information reported on operators' annual report. The MPSC has not started to trend the information.

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| 5 | General Comments:
Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

The MPSC has generally complied with the requirements in Part F of this evaluation.

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



PART G - Field Inspections

Points(MAX) Score

- 1** Operator, Inspector, Location, Date and PHMSA Representative Info OnlyInfo Only
Info Only = No Points
Name of Operator Inspected:

Name of State Inspector(s) Observed:

Location of Inspection:

Date of Inspection:

Name of PHMSA Representative:

Evaluator Notes:

A field inspection was not conducted because the MPSC did not seek certification or an agreement for 2012.

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- 2** Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? (F2) 1 NA
Yes = 1 No = 0

Evaluator Notes:

A field inspection was not conducted because the MPSC did not seek certification or an agreement for 2012.

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- 3** 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) (F3) 2 NA
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

A field inspection was not conducted because the MPSC did not seek certification or an agreement for 2012.

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- 4** Did the inspector thoroughly document results of the inspection? (F4) 2 NA
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

A field inspection was not conducted because the MPSC did not seek certification or an agreement for 2012.

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- 5** Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps, valve keys, half cells, etc) (F5) 1 NA
Yes = 1 No = 0

Evaluator Notes:

A field inspection was not conducted because the MPSC did not seek certification or an agreement for 2012.

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- 6** Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) (F7) 2 NA
Yes = 2 No = 0 Needs Improvement = 1
- a. Procedures
 - b. Records
 - c. Field Activities
 - d. Other (please comment)

Evaluator Notes:

A field inspection was not conducted because the MPSC did not seek certification or an agreement for 2012.

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- 7** Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) (F8) 2 NA

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

A field inspection was not conducted because the MPSC did not seek certification or an agreement for 2012.

8	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) (F9) Yes = 1 No = 0	1	NA
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Evaluator Notes:

A field inspection was not conducted because the MPSC did not seek certification or an agreement for 2012.

9	During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable) (F10) Yes = 1 No = 0	1	NA
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Evaluator Notes:

A field inspection was not conducted because the MPSC did not seek certification or an agreement for 2012.

10	General Comments: What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) Other Info Only = No Points	Info Only	Info Only
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- | | | |
|----|-----------------------------------|--------------------------|
| a. | Abandonment | <input type="checkbox"/> |
| b. | Abnormal Operations | <input type="checkbox"/> |
| c. | Break-Out Tanks | <input type="checkbox"/> |
| d. | Compressor or Pump Stations | <input type="checkbox"/> |
| e. | Change in Class Location | <input type="checkbox"/> |
| f. | Casings | <input type="checkbox"/> |
| g. | Cathodic Protection | <input type="checkbox"/> |
| h. | Cast-iron Replacement | <input type="checkbox"/> |
| i. | Damage Prevention | <input type="checkbox"/> |
| j. | Deactivation | <input type="checkbox"/> |
| k. | Emergency Procedures | <input type="checkbox"/> |
| l. | Inspection of Right-of-Way | <input type="checkbox"/> |
| m. | Line Markers | <input type="checkbox"/> |
| n. | Liaison with Public Officials | <input type="checkbox"/> |
| o. | Leak Surveys | <input type="checkbox"/> |
| p. | MOP | <input type="checkbox"/> |
| q. | MAOP | <input type="checkbox"/> |
| r. | Moving Pipe | <input type="checkbox"/> |
| s. | New Construction | <input type="checkbox"/> |
| t. | Navigable Waterway Crossings | <input type="checkbox"/> |
| u. | Odorization | <input type="checkbox"/> |
| v. | Overpressure Safety Devices | <input type="checkbox"/> |
| w. | Plastic Pipe Installation | <input type="checkbox"/> |
| x. | Public Education | <input type="checkbox"/> |
| y. | Purging | <input type="checkbox"/> |
| z. | Prevention of Accidental Ignition | <input type="checkbox"/> |
| A. | Repairs | <input type="checkbox"/> |
| B. | Signs | <input type="checkbox"/> |
| C. | Tapping | <input type="checkbox"/> |
| D. | Valve Maintenance | <input type="checkbox"/> |
| E. | Vault Maintenance | <input type="checkbox"/> |
| F. | Welding | <input type="checkbox"/> |



- G. OQ - Operator Qualification
- H. Compliance Follow-up
- I. Atmospheric Corrosion
- J. Other

Evaluator Notes:

A field inspection was not conducted because the MPSC did not seek certification or an agreement for 2012.

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



PART H - Interstate Agent State (if applicable)

Points(MAX) Score

1 Did the state use the current federal inspection form(s)? (C1) 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
The MPSC was not an interstate agent in 2011.

2 Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? (C2) 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
The MPSC was not an interstate agent in 2011.

3 Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? (C3) 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
The MPSC was not an interstate agent in 2011.

4 Were 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.) (C4) 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
The MPSC was not an interstate agent in 2011.

5 Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (C5) 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
The MPSC was not an interstate agent in 2011.

6 Did the state give written notice to PHMSA within 60 days of all probable violations found? (C6) 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
The MPSC was not an interstate agent in 2011.

7 Did the state initially submit documentation to support compliance action by PHMSA on probable violations? (C7) 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
The MPSC was not an interstate agent in 2011.

8 General Comments: Info OnlyInfo Only
Info Only = No Points

Evaluator Notes:
The MPSC was not an interstate agent in 2011.

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



PART I - 60106 Agreement State (if applicable)

Points(MAX) Score

1 Did the state use the current federal inspection form(s)? (B21) 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Upon a review of randomly selected inspection report files the federal form used was current.

2 Are results documented demonstrating inspection units were reviewed in accordance with state inspection plan? (B22) 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, the units were inspected according to the plan and procedures.

3 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.) (B23) 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

There were no probable violations found during 2011.

4 Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (B24) 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

There were no conditions identified.

5 Did the state give written notice to PHMSA within 60 days of all probable violations found? (B25) 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

There were no probable violations found during 2011.

6 Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? (B26) 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

There were no probable violations found during 2011.

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

Evaluator Notes:

The MPSC generally with the requirements of Part I of this evaluation.

Total points scored for this section: 2
Total possible points for this section: 2

