



2009 Hazardous Liquid State Program Evaluation

for

Louisiana Department of Natural Resources

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: Louisiana
Agency Status:
Date of Visit: 07/19/2010 - 07/24/2010
Agency Representative: James Mergist, Asst Director Pipeline Division
PHMSA Representative: Patrick Gaume, State Liaison
Commission Chairman to whom follow up letter is to be sent:
Name/Title: James H. Welsh, Commissioner
Agency: Louisiana Department of Natural Resources-Office of Conservation
Address: 617 North Third St.
City/State/Zip: Baton Rouge, Louisiana 70802

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

PARTS	Possible Points	Points Scored
A General Program Qualifications	26	26
B Inspections and Compliance - Procedures/Records/Performance	24	24
C Interstate Agent States	0	0
D Accident Investigations	7	7
E Damage Prevention Initiatives	9	9
F Field Inspection	12	12
G PHMSA Initiatives - Strategic Plan	10	9.5
H Miscellaneous	3	3
I Program Initiatives	9	9
TOTALS	100	99.5
State Rating		99.5

PART A - General Program Qualifications

Points(MAX) Score

1	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 Yes = 8 No = 0 Needs Minor Improvement = 3-7 Needs Major Improvement = 2	8	8
	a. State Jurisdiction and agent status over Hazardous Liquid and CO2 facilities (1)		<input checked="" type="checkbox"/>
	b. Total state inspection activity (2)		<input checked="" type="checkbox"/>
	c. Hazardous Liquid facilities subject to state safety jurisdiction (3)		<input checked="" type="checkbox"/>
	d. Hazardous Liquid pipeline incidents (4)		<input checked="" type="checkbox"/>
	e. State compliance actions (5)		<input checked="" type="checkbox"/>
	f. State record maintenance and reporting (6)		<input checked="" type="checkbox"/>
	g. State employees directly involved in the Hazardous Liquid pipeline safety program (7)		<input checked="" type="checkbox"/>
	h. State compliance with Federal requirements (8)		<input checked="" type="checkbox"/>

SLR Notes:

A.1 All items are listed and reported in the Haz Liq Certification Document.

2	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 Yes = 1 No = 0	1	1
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SLR Notes:

A.2. LA DNR meets the Federal reporting requirements. LaDNR also compares NRC reports against reports to the LaDNR to assure full reporting compliance.

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

A.3. Yes, in the last week of July 2009. Practice is to schedule every year over the last week of July.

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

A.4. Yes, the paper files are in the File Room in the Pipeline Division area.

5	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 Yes = 2 No = 0 Needs Improvement = 1	2	2
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SLR Notes:

A.5. Yes, The Program Manager & records review show a professional knowledge of the regulations.

6	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 Yes = 1 No = 0	1	1
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SLR Notes:

A.6. Yes, the letters were received on December 19th, and response was sent on February 17th.

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 Yes = 1 No = 0	1	1
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SLR Notes:



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
 Yes = 3 No = 0
- 3 3

SLR Notes:

A.8 Yes, for 2009 they are in compliance with the State Guidelines with the 3 yr attend & 5 yr complete rule for new staff. For the 5 long term inspectors needing a total of 8 courses, 3 inspectors have come into compliance. The 4th inspector was first on the wait list and then was scheduled into 2010 for his two classes. The 5th inspector had significant health problems and is re-scheduled for his two courses into 2010.

- 9** Brief Description of Non-T&Q training Activities Info Only Info Only
 Info Only = No Points
- For State Personnel:
 State- Most inspectors attend the annual 195 Seminar & the 192 Seminar. In addition, several staff attended the 8 hr LSU HAZWOPER REFRESHER COURSE.
- For Operators:
 Operators ? Held the annual T&Q Pipeline Safety Seminar. There were also several individual operator training sessions, usually associated with an inspection. Worked with ExxonMobil to practice a table-top emergency drill of a major HVL leak.
- For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:
 Non-operator/public ? LDNR personnel made a presentation at an LSU fire fighting school, concerning pipeline safety. LDNR has established the Geaux Team who make Damage Prevention information available at County Fairs and other public events.

SLR Notes:

A.9. State- Most inspectors attend the annual 195 Seminar & the 192 Seminar. In addition, several staff attended the 8 hr LSU HAZWOPER REFRESHER COURSE.
 Operators ? Held the annual T&Q Pipeline Safety Seminar. There were also several individual operator training sessions, usually associated with an inspection. Worked with ExxonMobil to practice a table-top emergency drill of a major HVL leak.
 Non-operator/public ? LDNR personnel made a presentation at an LSU fire fighting school, concerning pipeline safety. LDNR has established the Geaux Team who make Damage Prevention information available at County Fairs and other public events.

- 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
 Yes = 1 No = 0
- 1 1

SLR Notes:

A.10. Yes. Dana Arabie (TSI 299 11/03) & Jacques Rotolo (TSI 299 9/04) are the OQ Leads. Two other inspectors & two Supervisors are OQ certified.

- 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
 Yes = 1 No = 0
- 1 1

SLR Notes:

A.11. Yes, IMP Leads are Dana Arabie (TSI 297 6/05, TSI 294 8/02, CBT are completed) & Jacques Rotolo (TSI 297 4/06, TSI 294 7/04, CBT are completed).

- 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
 Yes = 5 No = 0
- 5 5

A. Total Inspection Person Days (Attachment 2):
 233.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
 220 X 1.75 = 385.00

Ratio: A / B
 233.00 / 385.00 = 0.61

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



SLR Notes:

A.12 A=233 person days. B=1.75 man years * 220 = 385 person days. A/B= .6052. .6052>.38, okay.

- 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:

A.13 No, staffing levels for 2007 to 2008 were unchanged. There were two retirements in 2008 & two new hires in November 2008. An attempt to increase staff in 2009 was turned down due to State Budget constraints.

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

SLR Notes:

A.14 In 2009, LDNR participated in every Pipeline Safety Emergency Drill that the pipeline operators invited them to. LDNR was a strong participant in NAPS, and actively participated on three committees: Control Room Management; Liquid Pipeline Task Group; and Staffing Formula Task Group. Mr. Dana Arabie served to organize or re-organize NAPS Committees: The Research and Development Committee, and the Gathering Line Task Group. LDNR actively participates in the quarterly Louisiana Regional Common ground alliance meetings. LDNR participates with and supports the efforts of Coastal And Marine Operators (CAMO) Pipeline Industry Initiative whose main purpose is to explore and discuss issues and challenges in preventing spills, releases, and damage to coastal and marine pipelines and environments. LDNR helps organize and co-sponsors the annual Pipeline Safety Seminars for Hazardous Liquid and Natural Gas operators. LDNR has established the Geaux Team who make Damage Prevention information available at County Fairs and other public events. LDNR works closely with the State Police and LaOneCall to promote 811 and implement safe excavation practices.

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



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

Inspection Procedures

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

SLR Notes:

B.1. Yes, Pipeline Safety Operations Manual, General Criteria Section, - Std, , IMP, OQ, Damage Prevention, Operator Training, Constr, Accident, & Follow-up are all addressed.

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

SLR Notes:

B.2. Yes, Pipeline Safety Operations Manual, General Criteria Section - Items a, b, c, & d are okay.

Inspection Performance

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

SLR Notes:

B.3. Yes, Units are being inspected in accordance with the Manual Guidelines. Units are tracked through a spread sheet program which tracks Std and special inspections. Other inspections are tracked on the spreadsheet 'as needed'.

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

SLR Notes:

B.4. Yes, the LaDNR Forms for OQ, IMP, & Standard inspections are the same as the Federal Forms.

- 5** Did state complete all applicable portions of inspection forms? (Chapter 5.1 (3)) Previous Question B.6 1 1
 Yes = 1 No = 0

SLR Notes:

B.5. Yes. Checked 4 Std, & Special inspections, all complete.

- 6** Did the state initiate appropriate follow-up actions to Safety Related Condition Reports? (Chapter 6.3) .5 0.5
 Previous Question B.7
 Yes = .5 No = 0

SLR Notes:



B.6. Yes, SRCR are tracked by Mike Spohrer & Mark Champagne, & updates are sent to the Feds.

7 Did the state review operator procedures for determining areas of active corrosion on liquid lines in sufficient detail? (NOTE: PHMSA representative to describe state criteria for determining areas of active corrosion) Previous Question B.8 .5 0.5
Yes = .5 No = 0

SLR Notes:

B.7. Yes, it is in the Haz Liq Std Inspection Form. See subpart H, 195.589(c), 195.573(b).

8 Did the state adequately review for compliance operator procedures for abandoning pipeline facilities and analyzing pipeline accidents to determine their causes? (NOTE: PHMSA representative to describe state criteria for determining compliance with abandoning pipeline facilities and analyzing pipeline accidents to determine their causes) Previous Question B.9 .5 0.5
Yes = .5 No = 0

SLR Notes:

B.8. Yes, it is in the Haz Liq Std Inspection Form.

9 Is the state aware of environmentally sensitive areas traversed by or adjacent to hazardous liquid pipelines? (reference Part 195, review of NPMS) Previous Question B.16 .5 0.5
Yes = .5 No = 0

SLR Notes:

B.9. Yes. Safety Division uses NPMS & State Coastal zone maps to monitor & compare with operator maps.

10 Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 195.402(c)(5)? Previous Question B.11 1 1
Yes = 1 No = 0

SLR Notes:

B.10. Yes it is on the Std Insp Form, and all accidents are followed up with most having on-site investigation.

Compliance - 60105(a) States

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

SLR Notes:

B.11. Yes, the inspections reports are placed in the subject Unit File and the violation letter with evidence are kept together in a violation file. The violation report & evidence are moved to the subject Unit file when it is closed. Records are retained as long as space is available, & at least for 4 years plus current

12 Does the state have written procedures to identify the steps to be taken from the discovery to the resolution of a probable violation as specified in the "Guidelines for State Participating in the Pipeline Safety Program"? (Chapter 5.1) Previous Question C(1).1 1 1
Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

B.12. Yes, in LAC 33:V subpart 3 Chapter 313.

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

SLR Notes:

B.13. Yes, in the LA Administrative Code (LAC 33 LIQUID, & LAC 43 GAS), & is cross referenced to the Pipeline Operations Manual. Through experience, a standard form has been developed.

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

SLR Notes:

B.14 Yes, in the LA Administrative Code (LAC 33 LIQUID, & LAC 43 GAS), & is cross referenced to the Pipeline Operations Manual. Through

experience, a standard form has been developed. The compliance action specifies the time available for response, and each inspector is responsible to ensure the time frames are adhered to or time extensions are justified. Managers hold inspectors accountable for the timely handling of compliance actions.

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

SLR Notes:

B.15. NA, there were 0 Haz Liq actions in 2009. The Safety Division has procedures.

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

SLR Notes:

B.16. Yes, the Pipeline Division uses a hand written spread sheet maintained by Arlene Andrus to track dates of inspection, citation, time limit for response, targeted re-inspection due date, actual re-inspection date, outcome, & closure dates.

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

SLR Notes:

B.17. Yes, minor violations were handled informally or with a letter and verified by re-inspection. For 2009, there were no actions where 'show cause' hearings were requested by Pipeline Division, which means that all cited operators complied (or are in the process of complying) with the enforcement actions. The process for 'show cause' hearings is in place.

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

SLR Notes:

B.18. Yes, they use an internal document ? 'Re-Inspection Form' & if the operator response is sufficient, the form is used to document closure of the compliance action.

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

SLR Notes:

B.19. Yes, See Form PLS-OR-1: Organization Report, Also see Pipeline Operations Manual, Glossary, Noncompliance.

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

SLR Notes:

B.20. Yes, due process is afforded all & is stated in the violation letters. See LA Administrative Code (LAC 33: V subpart 3 Chapter 313 LIQUID, & LAC 43: XI subpart 3 Chapter 5 GAS)

Compliance - 60106(a) States

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

SLR Notes:

B.21- B.26. NA, is a 60105(a) program.

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:

B.21- B.26. NA, is a 60105(a) program.



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

SLR Notes:

B.21- B.26. NA, is a 60105(a) program.

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

SLR Notes:

B.21- B.26. NA, is a 60105(a) program.

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

SLR Notes:

B.21- B.26. NA, is a 60105(a) program.

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

SLR Notes:

B.21- B.26. NA, is a 60105(a) program.

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

SLR Notes:

B.27. LDNR continues to focus on achieving 100% Haz Liq Unit inspections per year, either Std or special. Inspection results became publically available on the LDNR web site in 2008. Created the Louisiana Common Ground Alliance in 2008 and are using it as a mechanism to fulfill the 9 elements of the 2006 PIPES Act. LDNR continues to make personnel available to support NAPSR and PHMSA initiatives.

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



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

SLR Notes:

C.1-8. NA, NOT INTERSTATE AGENT

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

SLR Notes:

C.1-8. NA, NOT INTERSTATE AGENT

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 NA
Yes = 1 No = 0

SLR Notes:

C.1-8. NA, NOT INTERSTATE AGENT

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

SLR Notes:

C.1-8. NA, NOT INTERSTATE AGENT

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:

C.1-8. NA, NOT INTERSTATE AGENT

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

SLR Notes:

C.1-8. NA, NOT INTERSTATE AGENT

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

SLR Notes:

C.1-8. NA, NOT INTERSTATE AGENT

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

SLR Notes:

C.1-8. NA, NOT INTERSTATE AGENT

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



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:

D.1. Yes. Pipeline SOP, General Criteria, Accident Investigations. Appendix C specifies: 1. Determine if safety violations occurred. 2. Determine root causes of the accident if asked by NTSB. 3. Cooperate with NTSB.

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:

D.2. Yes, the MOU between NTSB and OPS is understood, and LDNR Pipeline Division fully cooperates with NTSB.

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

SLR Notes:

D.3. Yes, 2 reportable accidents, 2 reports, plus follow up of several non-reportable accidents when notification was received.

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

SLR Notes:

D.4. Yes, telephonic contact is made, and the 'Telephonic Leak Report' is used. The information received is used to determine if an on-site visit is required. 1 of the 2 Federally reportable incidents had a field visit.

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:

D.5. Yes, LaDNR uses the federal pipeline failure investigation form when an on-site investigation is made. The events are documented and Appendix C is followed. Including findings of fact, probable cause, and to determine if Pipeline Safety Regulations were followed.

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:

D.6. Yes, of the 2 accidents, 2 reviews are complete and no violations have been found.

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:

D.7 Yes, the reports are reviewed for completeness & to ensure that a final report is submitted. Corrective Action Orders are considered. The Safety Division has regular contact with PHMSA SW Region and DC to ensure that accident/incident reports are accurate & updated.

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

SLR Notes:



D.8 There were only 2 reportable accidents and there were no fatalities or injuries due to reportable accidents in Louisiana in 2009.

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



PART E - Damage Prevention Initiatives

Points(MAX) Score

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

SLR Notes:

E.1. Yes, it is on LDNR's advisory bulletin list attached to the Std Insp Form. For 2009, this question is addressed in LDNR's Std Insp Form, Damage Prevention module - item 195.442(a).

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

SLR Notes:

E.2. Yes, it is in the Std Insp Form, under Damage Prevention.

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

SLR Notes:

E.3. Yes, LDNR helped create the Louisiana Common Ground Alliance in 2008. LDNR has been promoting the Best Practices document for the past several years. The State Police are issuing citations and fines for excavation damages.

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

SLR Notes:

E.4. Yes, the Louisiana One Call is tracking this data in the form of number of locate requests per damage event. In 2007 it was 176 locates per damage, in 2008 it was 185 locates per damage, and in 2009 it was 226 locates per damage.

- | | | | |
|----------|---|---|---|
| 5 | Did the state review operators' records of accidents and failures due to excavation damage to ensure causes of failure are addressed to minimize the possibility of recurrence as required by 195.402 (c)(5)?
Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

E.5. Yes, it is addressed during Std Inspections, per 195.402(c)(5).

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

SLR Notes:

E.6. LDNR helped create the Louisiana Common Ground Alliance in 2008. The State Police are issuing citations and fines for excavation damages. There is increasing effort to have operators capture and evaluate ALL excavation damages to maximize opportunities for lessons learned. The Governor's office declared May, 2009 as Damage Prevention month and encouraged calling 811 before digging.

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



PART F - Field Inspection

Points(MAX) Score

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

Name of Operator Inspected:

Chevron Pipe Line Comany

Name of State Inspector(s) Observed:

Mark Champagne

Location of Inspection:

Lafayette, Louisiana

Date of Inspection:

4/29/2010

Name of PHMSA Representative:

Dale Bennett

SLR Notes:

Offshore inspection Tiger Shoal Pipe Line System Platform 214 to SST

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

SLR Notes:

The operator was notified on 3/22/2010.

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

SLR Notes:

The inspector used the Federal Liquid Inspection Form.

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

SLR Notes:

The inspector completly filled out the inspection form.

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

SLR Notes:

The inspector reviewed with the operator all equipment need for the inspection.

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

SLR Notes:

Field part of a Standard Inspection.

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

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

SLR Notes:



Yes

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

SLR Notes:

The inspector had adequate knowledge of the pipeline safety program and regulations.

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

SLR Notes:

The inspector conducted an exit interview.

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

SLR Notes:

No probable violations were found during the inspection.

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

SLR Notes:

Pump station, cathodic protection test points, right-of-way, line markers, overpressure safety devices, signs and valve maintenance.

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

SLR Notes:

No best practices was shared.

13 Field Observation Areas Observed (check all that apply) Info Only Info Only
Info Only = No Points

- a. Abandonment
- b. Abnormal Operations
- c. Break-Out Tanks
- d. Compressor or Pump Stations
- e. Change in Class Location
- f. Casings
- g. Cathodic Protection
- h. Cast-iron Replacement
- i. Damage Prevention
- j. Deactivation
- k. Emergency Procedures
- l. Inspection of Right-of-Way
- m. Line Markers
- n. Liaison with Public Officials
- o. Leak Surveys
- p. MOP
- q. MAOP
- r. Moving Pipe
- s. New Construction
- t. Navigable Waterway Crossings



- u. Odorization
- v. Overpressure Safety Devices
- w. Plastic Pipe Installation
- x. Public Education
- y. Purging
- z. Prevention of Accidental Ignition
- A. Repairs
- B. Signs
- C. Tapping
- D. Valve Maintenance
- E. Vault Maintenance
- F. Welding
- G. OQ - Operator Qualification
- H. Compliance Follow-up
- I. Atmospheric Corrosion
- J. Other

SLR Notes:

See above

14 Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

The inspector was very knowledgeable and did an excellent job.

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:

G.1. Yes, a prioritization risk model spreadsheet has been developed (originally from IMP) that is being adapted to all Operators. It impacts the areas of emphasis during the annual inspections. Elements include compliance issues, accidents, leaks, product transported, population density, MOP as a % of SMYS, total miles of pipeline, corrosion control, & operator responsiveness.

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

SLR Notes:

G.2. Yes, Units are created by Operator, pipe location, Operator management unit, etc.

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

SLR Notes:

G.3. Yes, the risking program has been in use since IMP.

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
 Yes = .5 No = 0

SLR Notes:

G.4. No, 0 points. have # calls and # damages by region but as yet it is not disaggregated into more specific information. DIRT was not used in 2009.

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

SLR Notes:

G.5. Yes, the reports are reviewed by an Engineer and compared with prior years. Also, pipeline mileage is used for assessing user fees so it is closely monitored.

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

SLR Notes:

G.6. Yes, LNDR reviews the Form for completeness, miles of pipe, & spill/leak data and trends it relative to prior years.

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

SLR Notes:

G.7. Yes, Reportable accidents are investigated relative to minimizing future events, including those due to excavation damage.

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:

G.8. Yes, performance indicators include accidents per 1000 miles of pipe; # of inspections performed; # of probable violations; # of probable violations corrected. Tracking data includes accidents per 1000 miles of jurisdictional pipe; total miles of jurisdictional pipe; # of reportable accidents; costs due to



reportable accidents; injuries due to reportable accidents; & deaths due to reportable accidents; these numbers are disaggregated to determine national numbers and LDNR State numbers.

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

G.9. Yes, all of the Standard and Protocol 9 OQ inspections for 2009 have been uploaded, typically within 1 month of the inspection. The focus in 2009 was to conduct Protocol 9 inspections of operators with emphasis on the covered task for line location, & to close out any open OQ violations.

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

G.10. Yes. For both GIMP & LIMP

11	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:

G.11. Yes. For both GIMP & LIMP.

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

G.12. Yes, the Federal Protocols are used.

13	Has state confirmed transmission operators have submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submission? <small>Yes = .5 No = 0</small>	.5	0.5
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SLR Notes:

G.13. Yes, This has been added (during 2009) onto question 195.402(c)(1) on the Standard Inspection.

Accident/Incident Investigation Learning and Sharing Lessons Learned

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

G.14. Yes, LDNR makes a report during the SW Region NAPSRS Meeting, and responds as appropriate to email correspondence. There were no noteworthy accidents/incidents in 2009 that generated lessons learned.

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

G.15. Yes, reports are received, followup is made, paperwork is checked, lessons learned are derived, Accident causes and regulatory compliance are determined, and site visits are usually made. Inspector duties are strongly outlined in SOP section 11.

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

G.16. LDNR does not have a criteria for a formal Root Cause Analysis at this time. Several inspectors are on the Root Cause class wait list, and one has completed the course. They do search for probable cause.

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

G.17. LDNR does not have a criteria for a formal Root Cause Analysis at this time. Several inspectors are on the Root Cause class wait list, and one has completed the course. They do search for probable cause.

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

SLR Notes:

G.18. Yes, Several inspectors are on the Root Cause class wait list, and one has completed the course.

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:

G.19. Yes, is providing a Pipeline Safety Seminar every year instead of every 3rd year, Helped create the Louisiana Common Ground Alliance, Have a close association with LA One Call and with the State Police for excavation enforcement.

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

SLR Notes:

G.20. Yes, the LDNR website is up and running. The public has access to all pipeline inspections on the website since March, 2008. Access to prior inspections requires an office visit.

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

SLR Notes:

G.21. LDNR is dedicated to being transparent, is making data easily available to the public, is committed to data evaluation for self improvement, understands the emphasis on accident/incident investigations, and has scheduled its personnel for additional training.

Total points scored for this section: 9.5
Total possible points for this section: 10



PART H - Miscellaneous

Points(MAX) Score

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

SLR Notes:

H.1. In 2009 LDNR tested, used, and improved the Mobile Pipeline Inspection & Reinspection Entry (MPIRE) Program. Several operators have reported using the MPIRE Program to help them in their own pipeline safety studies. LDNR continues to provide associate staff to TQ. LDNR is active on three NAPSR Committees. LDNR continues to support training in the public sector, most recently by providing staff to the LSU Firefighting School to train petrochemical personnel in pipeline safety.

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

SLR Notes:

H.2. LDNR enforces current Federal Regulations and provides technical information to the LA Legislature to make changes as needed in State Laws. LDNR has helped create the LA Common ground Alliance and has established a working relationship with the State Police to enforce excavation damage violations.

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

SLR Notes:

H.3. Yes; Risk Reduction: The Pipeline Division works closely with the State Police and LA One Call to improve compliance with the one call law and enforcement efforts as well as with the LA Regional CGA to enhance the one call law. In addition, the Pipeline Division's goal of inspecting 100% of operators and units annually results in increased visibility throughout the state which enhances our public safety efforts.

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

SLR Notes:

H.4. Yes, LDNR works with NAPSR, T&Q, NTSB, PHMSA, and is on various committees.

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

SLR Notes:

H.5. Yes, through SW Region NAPSR, correspondence with other States, other NAPSR & PHMSA committees.

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

SLR Notes:

H.6. In 2009 LDNR tested, used, and improved the Mobile Pipeline Inspection & Reinspection Entry (MPIRE) Program. Several operators have reported using the MPIRE Program to help them in their own pipeline safety studies. LDNR continues to provide associate staff to TQ. LDNR is active on three NAPSR Committees. LDNR continues to support training in the public sector, most recently by providing staff to the LSU Firefighting School to train petrochemical personnel in pipeline safety. LDNR enforces current Federal Regulations and provides technical information to the LA Legislature to make changes as needed in State Laws. LDNR has helped create the LA Common Ground Alliance. The Pipeline Division works closely with the State Police and LA One Call to improve compliance with the one call law and enforcement efforts as well as with the LA Regional CGA to enhance the one call law. In addition, the Pipeline Division's goal of inspecting 100% of operators and units annually results in increased visibility throughout the state which enhances our public safety efforts.

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



PART I - Program Initiatives

Points(MAX) Score

Drug and Alcohol Testing (49 CFR Part 199)

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

SLR Notes:

I.1. Yes, since the inception of the D&A Program, and verifies with all new Operators.

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

SLR Notes:

I.2. Yes, D&A inspections have been added to the SOP. LA has adopted the Federal D&A Forms. The Fed Forms address operators complying with their own program.

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

SLR Notes:

I.3. Yes, this issue is addressed on the Fed Form #3.1.11 on question A.02.b.

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

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

SLR Notes:

I.4. Yes. All Operators have been OQ inspected and re-inspected. Several Protocol 9 inspections are done every year.

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

SLR Notes:

I.5. Yes, All OQ inspections are in complete compliance with the federal guidelines.

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

SLR Notes:

I.6. Yes, it is covered in the OQ inspections.

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

SLR Notes:

I.7. Yes, OQ records are checked during every OQ inspection and every Protocol 9 inspection.

Hazardous Liquid Pipeline Integrity Management (49 CFR Part 195.452)

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

SLR Notes:

I.8. Yes, all Operators have been inspected twice.

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

SLR Notes:

I.9. Yes, all Operators have been inspected twice, and the protocols were reviewed to prove HCAs and inclusion in LIMP or prove the lack of HCAs and exclusion from LIMP.

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

I.10. Yes, all Operators have been inspected twice.

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

I.11. Yes, all Operators have been inspected twice. All violations, tests, and remedial actions have been properly addressed.

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

I.12. Yes, Haz Liq Operators are submitting annual reports which include HCA data. Changes of HCA reported are followed up on.

Public Awareness (49 CFR Section 195.440)

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

I.13. Yes; LDNR has verified the status of every operators' public awareness program.

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

SLR Notes:

I.14. Yes; either by use of the Clearinghouse or my direct submission of their plans to LDNR. Detail review is a work in progress. The reviews are being done as stand-alone inspections initially and then will be part of the Standard Inspection.

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

SLR Notes:

I.15. Yes; it is a work in progress. Operators are being reviewed during stand-alone inspections initially and then during the Standard Inspections.

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

I.17. LDNR is aware of the Public Awareness requirements and is working the program. It will take some time.

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

I.17. LDNR is aware of the Public Awareness requirements and is working the program. It will take some time.

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