Appendix 5A

Compliance Checklist of Longhorn Procedures against 49 CFR Part 195, Transportation of Hazardous Liquids by Pipeline

Table 5A-1. Comparison of Longhorn Operational Procedures with Title 49 CFR Part 195, Transportation of Hazardous Liquids by Pipeline

Section	Topic	Issue/Details	Compliance	Comments
Subpart A	*General*	This regulation prescribes safety standards and reporting requirements for liquid pipeline facilities	n/a	Background Information
195.1	Applicability	Applies to pipeline facilities and the transportation of hazardous liquids associated with those facilities in or affecting interstate commerce	n/a	Background Information
195.2	Definitions		n/a	Background Information
195.3	Matter incorporated by reference		n/a	Background Information
195.4	Compatibility necessary for transportation of hazardous liquids or carbon dioxide	The hazardous liquid must be compatible with the pipeline, all components, and any other commodity it might come in contact with while in the pipeline.		Considered in design/ construction procedures
195.5	Conversion to service subject to this part	Contains qualifications for steel pipe previously used in service not subject to the regulation	n/a	Only applicable for liquid to gas or vice versa.
195.8	Transportation of hazardous liquid or carbon dioxide in pipeline constructed with other than steel pipe		n/a	Not applicable to this pipeline
195.10	Responsibility of operator for compliance with this part		Meets	LPP has contracted with WPC to operate the Longhorn pipeline (RAD 20062)
Subpart B	*Reporting Accidents and safety-Related Conditions*			
195.50	Reporting accidents	Requirements for accidents that require reporting to DOT	Meets	OP-20.5, Form O2-OPR-1565
195.52	Telephonic notice of certain accidents	Requirements for giving notice of certain failures	Meets	OP-20.3
195.54	Accident reports	Report must be submitted within 30 days of discovery of accident	Meets	OP-20.1, 20.4
195.55	Reporting safety-related conditions	Requirements for reporting safety related conditions	Meets	OP-20.7, 20.8
195.55(a)(1)	General corrosion that reduces wall thickness or localized corrosion pitting which may result in leakage	Reduction in wall thickness to less than that required for maximum operating pressure	Meets	OP-6.28 to -6.33, based on ANSI B31.4 requirements
195.55(a)(2)	Unintended movement or abnormal loading of pipeline	Caused by environmental forces such as earthquake, landslide, or flood, that impairs its serviceability		Design/construction issue

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Section	Topic	Issue/Details	Compliance	Comments
195.55(a)(3)	Material defect or physical damage that impairs serviceability of pipeline		Meets	OP-6.28 to -6.32
195.55(a)(4)	Any malfunction or operating error that cause a pipeline pressure above 100% of maximum operating pressure		Meets	OC-2.10, 2.11, -5.1 to -5.3
195.55(a)(5)	An emergency pipeline leak		Meets	OP-20.1 to 20.4
195.55(a)(6)	Safety-related condition	Condition that could lead to an imminent hazard and causes, a 20% or more reduction in operating pressure or shutdown of operation of a pipeline	Meets	OP-20.7 to -20.10
195.56	Filing safety-related condition reports	Must be filed within 5 working days of determining that the condition exists, but not later than 10 days after discovering the condition	Meets	OP-20.9, 20.10; Form O2-PIR-1055
Subpart C	*Design Requirements*	Prescribes minimum design requirements for new pipeline systems and for relocating, replacing or changing existing systems	n/a	The focus of this review is operational procedures. A compliance check of this section is beyond the scope of this effort
Subpart D	*Construction*	Prescribes minimum requirements for constructing new pipeline systems and for relocating, replacing, or otherwise changing existing systems	n/a	The focus of this review is operational procedures. A compliance check of this section is beyond the scope of this effort
Subpart E	*Pressure Testing*	Prescribes minimum requirements for pressure testing steel pipelines	n/a	Background Information
195.302	General Requirements	No operator may operate a pipeline unless it has been pressure tested without leakage	Meets	Referenced document API RP-1110; Company Pipeline Pressure testing Procedure (159PPTP)
195.303	Test pressure	Minimum of 4 hour test at pressure 125% or more of MOP	Meets	OP-6.42, MCOJT 3.02
195.304	Testing of components	Must test all pipe and attached fittings	Meets	OP-6.42, MCOJT 3.02
195.306	Test medium	Water must be used, with the following exceptions.	Meets	OP-6.42, MCOJT 3.02 Water used for hydrotest. No exceptions stated.

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Section	Topic	Issue/Details	Compliance	Comments
195.308	Testing of tie-ins	Pipe associated with tie-ins must be tested	Meets	OP-6.42, MCOJT 3.02
195.310	Records	Record of the latest test must be retained as long as the facility is in use	Meets	O2-ENG-1010
Subpart F	*Operation and Maintenance*	Prescribes minimum requirements for operating and maintaining steel pipeline systems	n/a	Background Information
195.401	General Requirements		n/a	Background Information
195.401(a)	No operator may operate a pipeline system at a level lower than these requirements		Meets	OP-20.7 to 20.10
195.401(b)	Any condition that could adversely affect safe operation shall be corrected in a reasonable time	If the condition presents an immediate hazard, the operator may not operate the affected part of the system until the condition is corrected	Meets	OP-20.7 to 20.10, OP-20.21
195.401(c)	No operator may operate a pipeline unless it was designed and constructed as required by this part	Applies to interstate pipelines transporting hazardous liquids constructed after March 31, 1970; intrastate pipelines constructed after October 20, 1985, and low-stress pipeline constructed after August 10, 1994	Applies to new construction portions of the system	Design and construction issue
195.402	Procedural manual for operations, maintenance, and emergencies		Meets	Williams System of Operating Manuals
195.402(a)	Written procedures required for normal operations and maintenance activities and handling abnormal operations and emergencies	Procedures must be reviewed at intervals not exceeding 15 months. Manual must be prepared before initial operations and appropriate parts kept at locations where activities are conducted	Meets	OP-19.2
195.402(b)	DOT may require the operator to amend plans and procedures to provide a reasonable level of safety		n/a	An administrative action of DOT.
195.402(c)	The manual must include procedures for the following:		n/a	Background Information
195.402(c)(1)	Availability of construction records, maps and operating history		Meets	OP-19.10 to -19.13
195.402(c)(2)	Gathering data for reporting accidents		Meets	OP-20.1 to -20.6
195.402(c)(3)	Operating, maintaining and repairing the pipeline		Meets	OP-6, O2-OPR-1565

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Section	Topic	Issue/Details	Compliance	Comments
195.402(c)(4)	Determining facilities located in areas requiring immediate response to prevent hazards to the public		Meets	Emergency Response Manual
195.402(c)(5)	Analyzing pipeline accidents to determine causes		Meets	OP-20.6, References Supervisors Accident Investigation Handbook
195.402(c)(6)	Minimizing the potential for hazards			Emergency Response Manual
195.402(c)(7)	Start up and shut down	Must consider the hazardous liquids in transport, variations in altitude, and pressure monitoring and control devices	Meets	OP-7
195.402(c)(8)	Monitoring start up ~~ad~~ and shut down for pipeline not equipped to fail safe		Meets	OP-7.3, Operations Control Procedures Volume
195.402(c)(9)	Detecting abnormal operating conditions for facilities not equipped to fail safe	Monitor pressure, temperature, flow and other appropriate operational data	Meets	Operations Control Procedures Volume
195.402(c)(10)	Abandoning pipeline facilities		Meets	OP-6.14
195.402(c)(11)	Minimizing accidental ignition of vapors		Meets	**Emergency Response Manual**
195.402(c)(12)	Establishing and maintaining liaison with fire, police, and appropriate public officials	Learn the responsibility and resources of each organization in responding to a hazardous liquid pipeline emergency	Meets	OP-19.3, Form O2-OPR-1600
195.402(c)(13)	Periodically review operating personnel work to determine effectiveness of the procedures used in normal operation and maintenance	Take corrective action where deficiencies are found	Meets	OP-Introduction, Form 32-ADM-1009
195.402(c)(14)	Take adequate precautions in excavated trenches	Protect from hazards of unsafe accumulations of vapors or gas	Meets	SA-15.7, 15.8
195.402(d)	Abnormal operations	Manual must include procedures for providing safety when operating design limits have been exceeded	Meets	**Operations Control Procedures Manual**
195.402(d)(1)	Responding to, investigating and correcting abnormal operations	Includes: unintended closure of valves or shutdowns; pressure or flow rates outside normal operating limits; loss of communications; operation of any safety device; any malfunction, deviation, or error which could cause a hazard	Meets	**Operations Control Procedures Manual**
195.402(d)(2)	Checking variations from normal operation to determine integrity and safe operation	After abnormal operation has ended and at sufficient critical locations in the system	Meets	**Operations Control Procedures Manual**

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Section	Topic	Issue/Details	Compliance	Comments
195.402(d)(3)	Correcting variations from normal operation of pressure and flow equipment and controls		Meets	**Operations Control Procedures Manual**
195.402(d)(4)	Notifying responsible personnel when notice of abnormal operation is received		Meets	**Operations Control Procedures Manual**
195.402(d)(5)	Periodically reviewing personnel response to determine effectiveness of procedures controlling abnormal operation	Take corrective action where deficiencies are found	Meets	**Operations Control Procedures Manual**
195.402(e)	Emergencies	Manual must include procedures to provide safety when emergency conditions occur	Meets	Emergency Response Manual
195.402(e)(1)	Receiving, identifying, and classifying notices of events which need immediate response	Includes notice to fire, police, or other public officials and communicating information to appropriate personnel for corrective action	Meets	Emergency Response Manual
195.402(e)(2)	Prompt and effective response to a notice of each type of emergency	Includes fire or explosion occurring near or involving a pipeline facility, accidental release of hazardous liquid, operational failure causing a hazardous condition, and natural disaster affecting pipeline facilities	Meets	Emergency Response Manual
195.402(e)(3)	Having personnel, equipment, instruments, tools, and materials available as needed at the scene		Meets	Emergency Response Manual
195.402(e)(4)	Taking necessary action to minimize the volume of hazardous liquid released		Meets	Emergency Response Manual
195.402(e)(5)	Control of released hazardous liquid to minimize hazards	Includes possible intentional ignition in the cases of flammable highly volatile liquid	Meets	Emergency Response Manual
195.402(e)(6)	Minimization of public exposure to injury and probability of accidental ignition	Includes assisting with evacuation of residents and halting traffic in the affected area, or taking other appropriate action	Meets	Emergency Response Manual
195.402(e)(7)	Notifying fire, police, and other public officials hazardous liquid pipeline emergencies	Includes coordinating preplanned and actual responses during an emergency	Meets	Emergency Response Manual
195.402(e)(8)	Use of appropriate instruments to assess the extent and coverage of a vapor cloud and determine the hazardous areas		Meets	Emergency Response Manual
195.402(e)(9)	Provide for post accident review of activities to determine whether procedures were effective	Take corrective action where deficiencies are found	Meets	Emergency Response Manual

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Section	Topic	Issue/Details	Compliance	Comments
195.402(f)	Safety-related condition reports	Manual must include instruction for recognizing conditions that potentially may be safety-related conditions	Meets	OP-20.7
195.403	Training	Each operator must establish and conduct continuing training program for operating and maintenance personnel	Meets	Pipeline Maintenance Crew On the Job Training Manual; Pipeline operations - on the Job Training
195.403(a)(1)	Carry out operating, maintenance, and emergency procedures related to personnel assignments		Meets	Pipeline Maintenance Crew On the Job Training Manual; Pipeline operations - on the Job Training
195.403(a)(2)	Know the characteristics and hazards of the hazardous liquids	Includes flammability of mixtures with air, odorless vapors, and water reactions	Meets	MCOJT-1.06, Chemical Hazard Communication/Chemical Hygiene Plan
195.403(a)(3)	Recognize conditions likely to cause emergencies and predict consequences of facility malfunctions or failures and spills	Includes taking appropriate corrective actions	Meets	SA- Safety Manual
195.403(a)(4)	Take steps necessary to control accidental releases and to minimize potential for fire, explosion, toxicity, or environmental damage		Meets	SA- Safety Manual
195.403(a)(5)	Learn the proper use of firefighting procedures and equipment	Includes fire suits and breathing apparatus and utilizing, where feasible, simulated pipeline emergency conditions	Meets	MCOJT-1.02, SA-8.1 to 8.25
195.403(a)(6)	Safely repair facilities using appropriate precautions		Meets	MCOJT-1.06, Chemical Hazard Communication and Chemical Hygiene Plan; Safety Manual
195.403(b)	At intervals not exceeding 15 months, but at least each calendar year, each operator shall:		n/a	Background Information
195.403(b)(1)	Review personnel performance in meeting objectives of training program		Meets	OP-18.1
195.403(b)(2)	Make appropriate changes to training program to ensure effectiveness		Meets	OP-18.1

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Section	Topic	Issue/Details	Compliance	Comments
195.403(b)(3)	Require and verify that supervisors maintain thorough knowledge of procedures for which they are responsible to insure compliance		Meets	OP-18.1
195.404	Maps and Records		n/a	Background Information
195.404(a)	Each operator shall maintain current maps and records of the pipeline system	Must include the location and identification of pipeline facilities; all crossings; MOP of each pipeline; diameter, grade, type, and nominal wall thickness of all pipe.	Meets	OP-19.9 to 19.13
195.404(b)	Maintain daily operating records for at least three years	Records must indicate discharge pressure for each pump station; and any emergency or abnormal operation which 195.402 apply	Meets	OP-7.9
195.404(c)	Each operator shall maintain the following records for the periods specified		n/a	Background Information
195.404(c)(1)	Date, location, and description of each repair to the pipe	Maintained for the useful life of the pipe	Meets	MCOJT-2.11, Form O2-ORP-1581\
195.404(c)(2)	Date, location, and description of each repair to parts of the pipeline system	Maintained for at least 1 year	Meets	MCOJT-2.11, Form O2-ORP-1581\
195.404(c)(3)	Record of each inspection and test	Maintained for the longer of 2 years or until next inspection or test	Meets	MCOJT 3.02, Form O2-ENG-1010
195.406	Maximum Operating Pressure (MOP)	Specifies MOPs for pressures other than surge pressures and other variations from normal operation	n/a	Background Information
195.406(a)(1)	Internal design pressure determined by 195.106	For unknown design factors, pressure is limited to 80% of yield pressure under B31.8 N5.0 reduced by appropriate factors of 195.106, or 200 psig for diameters less than 12.75 in.	Meets	OC-5
195.406(a)(2)	The design pressure of any pipeline component		Meets	OC-5, MCOJT 3.02
195.406(a)(3)	80% of test pressure for any part tested under Subpart E		Meets	OC-5, MCOJT 3.02
195.406(a)(4)	80% of factory test pressure or prototype test pressure for individual components		Meets	OC-5, MCOJT 3.02
195.406(a)(5)	80% of test pressure or highest operating pressure for four or more continuous hours	Must be demonstrated by recording charts or logs made at the time the test or operations were conducted	Meets	OC-5, MCOJT 3.02

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Section	Topic	Issue/Details	Compliance	Comments
195.406(b)	No operator may permit pressure to exceed 110% of the operating pressure limit during surges or other variations	Must provide adequate controls and protective equipment to control pressure within this limit	Meets	OC 2.10, 3.1; OC-5, MCOJT 3.02; OP-6.15 to 6.21
195.408	Communications		n/a	Background Information
195.408(a)	Each operator must have a communication system to transfer information needed for safe operation		Meets	Operator On-The-Job Training 2.02
195.408(b)	The communication system must include means for:		n/a	Background Information
195.408(b)(1)	Monitoring operational data	Per 195.402(c)(9)	Meets	SCADA
195.408(b)(2)	Receiving notices of abnormal or emergency conditions and sending information to appropriate personnel		Meets	OP-6.24, OP-20
195.408(b)(3)	Conducting two-way vocal communication between control center and scene of abnormal operations or emergency		Meets	Emergency Response Manual
195.408(b)(4)	Providing communication with fire, police, and other public officials during emergency conditions		Meets	Emergency Response Manual
195.410	Line Markers		n/a	Background Information
195.410(a)	Each operator shall place and maintain line markers over each buried pipeline		Meets	MCOJT 2.08, includes reference to WPC Design Standards and Specifications 1125, 1125-A thorough 1125-G.
195.410(a)(1)	Markers must be located at road crossings, railroad crossings, and in sufficient number along the remainder of each buried line so location is accurately known		Meets	
195.410(a)(2)	Marker must include warning of the liquid transported and contact information for operator	Letters must be one inch high, with ~1/4 inch stroke, except in heavily developed urban areas	Meets	
195.410(b)	Exceptions for line markers		Meets	

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Section	Topic	Issue/Details	Compliance	Comments
195.410(c)	Each operator shall provide line markers where above ground pipe is accessible to the public		Meets	
195.412	Inspection of rights-of-way and crossings under navigable waters		Meets	OP-19.5; OP-6.47 to -6.50
195.412(a)	Each operator shall inspect the surface conditions on or adjacent to each pipeline right-of-way	Intervals not exceeding 3 weeks, but at least 26 times each calendar year	Meets	MCOJT 2.16
195.412(b)	Each operator shall inspect each crossing under a navigable waterway to determine the condition of the crossing	Intervals not exceeding 5 years	Meets	OP-6.47 to 6.50; OP-19.5
195.413	Underwater inspection and reburial of pipelines in the Gulf of Mexico and its inlets		n/a	Not applicable to the Longhorn pipeline
195.414	Cathodic protection		Meets	MC-7.15 to 7.18; MC-7.19
195.414(a)	No operator may operate a hazardous liquid pipeline that has an effective external surface coating material unless it is cathodically protected.		Meets	OP-6.53, 6.54
195.414(b)	Each operator shall electrically inspect bare pipeline to determine areas where active corrosion is taking place	In areas where active corrosion is found, the operator shall provide cathodic protection.	Meets	OP-19.5, 6.54, 6.58; MCOJT 2.03
195.414(c)	Each operator shall electrically inspect breakout tank areas and buried pumping station piping as to the need for cathodic protection	Cathodic protection shall be provided where necessary	Meets	OP-6.53,6.54
195.416	External corrosion control		n/a	Background Information
195.416(a)	Each operator shall conduct tests on buried, in contact with the ground, or submerged pipeline facility under cathodic protection to determine whether protection is adequate	Intervals not exceeding 15 months, but at least once each calendar year	Meets	OP-19.5
195.416(b)	Each operator shall maintain test leads		Meets	OP-6.56
195.416(c)	Each operator shall inspect each cathodic protection rectifier	Intervals not exceeding 2.5 months, but at least 6 times each calendar year.	Meets	OP-6.54

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Section	Topic	Issue/Details	Compliance	Comments
195.416(d)	Each operator shall electrically inspect bare pipe that is not cathodically protected and must study leak records to see if additional protection is necessary	Intervals not exceeding 5 years	Meets	OP-6.58; MCOJT 2.14
195.416(e)	Operator shall examine exposed pipe for evidence of external corrosion	If active corrosion is found, the operator shall investigate further to determine the extent of corrosion	Meets	OP-6.58; OP-6.28 to 6.33
195.416(f)	Corroded pipe with wall thickness less than minimum required must be replaced with coated pipe or repaired	The operator need not replace corroded pipe if the operating pressure is reduced based on the actual remaining wall thickness	Meets	OP-6.58
195.416(g)	If localized pitting is found to the extent that leakage may result, the pipe must be repaired or replaced, or the operating pressure reduced based on the actual remaining wall thickness		Meets	OP-6.58, Forms O2-OPR-1575, or O2-OPR-1581
195.416(h)	The strength of pipe based on actual remaining wall thickness may be determined using B31G of the AGA/Battelle modified procedure	In accordance to limitations set out in the respective procedures	Meets	OP-6.28 to -6.33; Based on ANSI B31.4, not B31G
195.416(i)	Each operator shall clean, coat, and maintain protection for each component in the pipeline system exposed to the atmosphere		Meets	OP-6.51 to OP-6.57
195.418	Internal corrosion control		n/a	Background information
195.418(a)	No operator may transport any hazardous liquid unless it has investigated the corrosive effect and taken adequate mitigation steps		Meets	OP-6.58
195.418(b)	If corrosion inhibitors are used, the operator shall use sufficient quantities to protect the entire part of the system	Coupons or other monitoring equipment shall be used to determine the effectiveness	Meets	OP-6.58
195.418(c)	Coupons or other monitoring equipment shall be examined to determine the effectiveness or the extent of corrosion	Intervals not exceeding 7.5 months, but at least twice each calendar year	Meets	OP-6.58
195.418(d)	If pipe is removed, the operator must inspect the internal surface for evidence of corrosion	Corroded pipe must be replaced or pressure reduced	Meets	OP-6.58
195.420	Valve maintenance		n/a	Background Information
195.420(a)	Each valve shall be maintained in good working order		Meets	OP-19.7; MCOJT 2.05; Form O2-OPR 1035

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Section	Topic	Issue/Details	Compliance	Comments
195.420(b)	Each mainline valve shall be inspected to determine it is functioning properly	Intervals not exceeding 7.5 months, but at least twice each calendar year	Meets	OP-19.7; MCOJT 2.05; Form O2-OPR 1035
195.420(c)	Valves shall be protected from unauthorized operation and vandalism		Meets	SA-2.13, OP-19.7; MCOJT 2.05; Form O2-OPR 1035
195.422	Pipe repairs		n/a	Background Information
195.422(a)	Each operator shall insure that repairs are made in safe manner to prevent damage to persons or property		Meets	MCOJT 1.0
195.422(b)	No operator may use any pipe, valve, or fitting for repairing facilities unless it is designed and constructed per this part		Meets	Materials meet API 5L, ANSI B16.5, API 6D, MSS-SR44; WPL 100
195.424	Pipe movement		n/a	
195.424(a)	Pressure must be reduced to not more than 50% of the maximum operating pressure (MOP)		n/a	
195.424(b)	No operator may move pipe containing highly volatile liquids where materials are joined by welding unless:		n/a	
195.424(b)(1)	Movement of the pipeline without liquids is impractical		n/a	
195.424(b)(2)	Procedures contain precautions to protect the public against the hazard		n/a	
195.424(b)(3)	The pressure is reduced	Pressure reduced to the lower of < 50% of the MOP, or the lowest practical level that will maintain the liquid in a liquid state, but not less than 50 psig above the vapor pressure	n/a	
195.424(c)	No operator may move pipe containing highly volatile liquids where pipe material are not joined by welding unless the line section is isolated to prevent flow	Operator must also comply with paragraph (b)(1) and (2) above	n/a	Design and construction issue

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Section	Topic	Issue/Details	Compliance	Comments
195.426	Scraper and sphere facilities	Must be equipped with a relief device capable of relieving pressure in the barrel. The device must indicate that pressure has been relieved or prevent insertion or removal of scrapers or spheres if pressure has not been relieved	Meets	OP-5.12, OP-6.77 to 6.78
195.428	Overpressure safety devices		n/a	Background Information
195.428(a)	Inspect and test each pressure limiting device, relief valve, pressure regulator, or other pressure control equipment to determine proper functioning, good mechanical condition, and adequate for capacity and reliability of operation	Intervals not exceeding 15 months, but at least once each calendar year. For pipeline carrying highly volatile liquids, intervals not exceeding 7.5 months, but at least twice each calendar year	Meets	OP-19.8, Preventative Maintenance Manual MC-5.8; O2-FAC-1010
195.428(b)	Pressure relief valves on pressure breakout tanks containing highly volatile liquids must be tested	Intervals not exceeding 5 years	Meets	OP-19.8; MC-5.8; Form O2-FAC-1010
195.430	Operator shall maintain firefighting equipment at each pump station and breakout tank area	Equipment must be in operating condition, clearly marked and easily accessible	Meets	SA-8.1 to 8.25
195.434	Breakout tanks shall be inspected	Intervals not exceeding 15 months but at least once each calendar year	Meets	OP-19.9, OOJT 6.21, O2-FAC-1009
195.434	Signs shall be maintained visible to the public around each pumping station and breakout tank area	Signs must contain operator name and emergency phone number	Meets	SA-2.1 to 2.11, OP-10.2 to 10.5
195.436	Security of facilities	Operators shall provide protection for each pump station, breakout tank area, or exposed facility from vandalism and unauthorized entry	Meets	SA-2.13; OOJT 2.14; MCOJT - 3.08
195.438	Smoking or open flames	Prohibits smoking or open flames in pump stations and breakout tank areas where leakage of flammable hazardous liquids or flammable vapors are possible	Meets	SA-2.5 regarding No smoking warning signs.
195.440	Public education	Each operator shall establish a continuing education program to enable public, governmental organizations, and excavators to recognize and report a hazardous liquid pipeline emergency	Meets	OP-19.9; MCOJT 2.02 MCOJT 2.18
195.442	Damage prevention program		n/a	Background Information

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Section	Topic	Issue/Details	Compliance	Comments
195.442(a)	Each operator shall carry out a written program to prevent pipeline damage from excavation activities	Compliance includes participation in a public service program, such as one-call	Meets	OP-19.9, MCOJT 2.02
195.442(b)	Damage prevention program must include:		n/a	Background Information
195.442(b)(1)	Identity of persons normally engaged in excavation activities near pipeline		Meets	OP-19.9, MCOJT 2.18
195.442(b)(2)	Notification of the public near the pipeline and excavators to make them aware of the damage prevention program	Notification as often as necessary. Includes programs existence, purpose, how to learn the location of underground pipelines	Meets	OP-19.9, MCOJT 2.02
195.442(b)(3)	Provide means of receiving and recording notification of planned excavations		Meets	OP-19.9, MCOJT 2.02
195.442(b)(4)	Provide notification of the type of temporary marking and how to identify marking to excavators		Meets	MCOJT 2.02, 2.08
195.442(b)(5)	Provide temporary marking of pipeline in the area of excavation before excavation begins		Meets	OP-19.9, MCOJT 2.02, SA-15.6
195.442(b)(6)	Provide for inspecting pipelines reasonably believed to be damaged by excavation	Inspect as frequently as necessary during and after excavation activities. Inspection must include leakage surveys for blasting	Meets	SA-15.10