PIPELINE SAFETY NATURAL GAS STATE PROGRAM EVALUATION – CY2012	
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PIPELINE SAFETY NATURAL GAS STATE PROGRAM EVALUATION – CY2012

	A – PROGRESS REPORT (CERTIFICATION) AND PROGRAM DOCUMENTATION REVIEW THIS SECTION ANALYZES ACCURACY AND COMPLETENESS OF ANNUAL PROGRESS REPORT (CERTIFICATION)	SCORE
1	Accuracy of Jurisdictional Authority and Operator/Inspection Units Data – Progress Report Attachment 1 (A1a) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
2	Review of Inspection Days for accuracy – Progress Report Attachment 2 (A1b) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
3	Accuracy verification of Operators and Operators Inspection Units in State – Progress Report Attachment 3 (A1c) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
4	Were all federally reportable incident reports listed and information correct? – Progress Report Attachment 4 (A1d) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
5	Accuracy verification of Compliance Activities – Progress Report Attachment 5 (A1e) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
6	Were pipeline program files well-organized and accessible? - Progress Report Attachment 6 (A1f, A4) (Yes= 2 points, No= 0 Points, NI=1 point) **Comments:**	2
7	Was employee listing and completed training accurate and complete? – Progress Report Attachment 7 (A1g) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
8	Verification of Part 192,193,198,199 Rules and Amendments – Progress Report Attachment 8 (A1h) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
9	List of Planned Performance - Did state describe accomplishments on Progress Report in detail – Progress Report Attachment 10 (H1-3) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
10	**General Comments:**	10

B – PROGRAM INSPECTION PROCEDURES Does State Inspection Plan include procedures that address the following elements? (Plan should include expected time intervals between inspections, if necessary. See Guidelines Section 5.1)		
1	Standard Inspections (B1a) (Yes= 2 points, No= 0 Points, NI=1 point) **Comments:**	2
2	IMP Inspections (including DIMP) (B1b) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
3	OQ Inspections (B1c) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
4	Damage Prevention Inspections (B1d) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
5	On-Site Operator Training (B1e) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
6	Construction Inspections (B1f) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
7	Incident/Accident Investigations (B1g) (Yes= 2 points, No= 0 Points, NI=1 point) **Comments:**	2
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) • **Length of time since last inspection** • **Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)** • **Type of activity being undertaken by operators (i.e. construction)** • **Locations of operators inspection units being inspected - (HCA's, Geographic area, Population Density, etc)** • **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)** • **Are inspection units broken down appropriately?** (Yes= 6 points, No= 0 Points, NI=1-5 points) **Comments:**	6
9	**General Comments:**	15

C – PROGRAM PERFORMANCE		
1	Was ratio of Total Inspection person-days to total person days acceptable? (Director of State Programs may modify with just cause) Chapter 4.3 (A12) **A = Total Inspection Person Days (Attachment 2)** **B = Total Inspection Person Days Charged to the program** **(220 x Number of Inspection person years from Attachment 7)** **Ratio = A/B If Ratio >= .38 then score = 5 points. If Ratio < .38 then score = 0 points.** (Yes= 5 points, No= 0 Points) **Comments:**	5
2	Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines for requirements) Chapter 4.4 (A8-A11, G19) **In addition -** **Completion of Required OQ Training before conducting inspection as lead?** **Completion of Required DIMP*/IMP Training before conducting inspection as lead?** **Root Cause Training by at least one inspector/program manager** **Note any outside training completed** *Effective Evaluation CY2013 (Yes= 5 points, No= 0 Points, NI=1-4) **Comments:**	5
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) (Yes= 2 points, No= 0 Points, NI=1 point) **Comments:**	2
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) (Yes= 2 points, No= 0 Points, NI=1 point) **Comments:**	2
5	Did State hold PHMSA TQ Seminar in Past 3 Years? Chapter 8.5 (A3) (Yes= 2 points, No= 0 Points) **Comments:**	2
6	Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1 (B3) (Yes= 5 points, No= 0 Points, NI=1-4 points) **Comments:**	5
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 points, No= 0 Points, NI=1 point) **Comments:**	2
8	Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Chapter 5.1 (B7) (Yes= 1 point, No= 0 Points) **Comments:**	1
9	Did the state review operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance) (NTSB) Chapter 5.1 (B8)	1

	(Yes= 1 point, No= 0 Points) **Comments:**	
10	Did the state review operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21? (NTSB) Chapter 5.1 (B9) (Yes= 1 point, No= 0 Points) **Comments:**	1
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 192.617? Chapter 5.1 (B10,E5) (Yes= 1 point, No= 0 Points) **Comments:**	1
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 (G6-9,G16) (Yes= 2 points, No= 0 Points, NI=1 point) **Comments:**	2
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 (G10-12) (Yes= 2 points, No= 0 Points, NI=1 point) **Comments:**	2
14	Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission? (G14) (Yes= 1 points, No= 0 Points, NI=.5 point) **Comments:**	1
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 points, No= 0 Points, NI= 1 point) **Comments:**	2
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 192 Part N (I4-7) (Yes= 2 points, No= 0 Points, NI=1 point) **Comments:**	2
17	Is state verifying operator's gas transmission integrity management programs (IMP) are up to date? This should include a previous review of IMP 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 192 Subpart 0 (I8-12) (Yes= 2 points, No= 0 Points, NI=1 point) **Comments:**	2

18	Is state verifying operator's gas distribution integrity management Programs (DIMP)? This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart P **DIMP – First round of program inspections should be complete by December 2014** (Yes= 2 points, No= 0 Points, NI=1 point) **Comments:**	2
19	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 192.616 (I13-16) **PAPEI Effectiveness Inspections should be complete by December 2013** (Yes= 2 points, No= 0 Points, NI=1 point) **Comments:**	2
20	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). (G20-21) (Yes= 1 points, No= 0 Points, NI=.5 point) **Comments:**	1
21	Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 (B6) (Yes= 1 points, No= 0 Points, NI=.5 point) **Comments:**	1
22	Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns? (G13) (Yes= 1 points, No= 0 Points, NI=.5 point) **Comments:**	1
23	Did the state participate in/respond to surveys or information requests from NAPSR or PHMSA? (Yes= 1 points, No= 0 Points, NI=.5 point) (H4) **Comments:**	1
24	**General Comments:**	46

D – COMPLIANCE ACTIVITIES		
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) • **Procedures to notify an operator (company officer) when a noncompliance is identified** • **Procedures to routinely review progress of compliance actions to prevent delays or breakdowns** (Yes= 4 points, No= 0 Points, NI=1-3 points) **Comments:**	4
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) • Were compliance actions sent to company officer or manager/board member if municipal/government system? • Document probable violations • Resolve probable violations • Routinely review progress of probable violations (Yes= 4 points, No= 0 Points, NI=1-3 points) **Comments:**	4
3	Did the state issue compliance actions for all probable violations discovered? (B15) (Yes= 2 points, No= 0 Points, NI=1 point) **Comments:**	2
4	Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary. (B17, B20) (Yes= 2 points, No= 0 Points) **Comments:**	2
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) (Yes= 2 points, No= 0 Points, NI=1 point) **Comments:**	2
6	Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations? (Yes= 1 point, No= 0 Points, NI= .5 point)**Comments:**	1
7	**General Comments:**	15

E – INCIDENT INVESTIGATIONS		
1	Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? And did state keep adequate records of Incident/Accident notifications received? Chapter 6 (A2,D1-3) • **Acknowledgement of MOU between NTSB and PHMSA (Appendix D)** • **Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E)** **(Yes= 2 points, No= 0 Points, NI=1 point)** **Comments:**	2
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 point, No= 0 Points, NI= .5 point) **Comments:**	1
3	Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? (D5) • **Observations and document review** • **Contributing Factors** • **Recommendations to prevent recurrences where appropriate** (Yes= 3 points, No= 0 Points, NI=1-2 points) **Comments:**	3
4	Did the state initiate compliance action for violations found during any incident/accident investigation? (D6) (Yes= 1 point, No= 0 Points) **Comments:**	1
5	Did the state assist region office by taking appropriate follow-up actions related to the operator incident 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 point, No= 0 Points, NI= .5 point) **Comments:**	1
6	Does state share lessons learned from incidents/accidents? (sharing information, such as: at NAPSR Region meetings, state seminars, etc) (G15) (Yes= 1 point, No= 0 Points) **Comments:**	1
7	**General Comments:**	9

F – DAMAGE PREVENTION		
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? NTSB (E1) (Yes= 2 points, No= 0 Points, NI=1 Point) **Comments:**	2
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 points, No= 0 Points, NI=1 Point) **Comments:**	2
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 points, No= 0 Points, NI=1 Point) **Comments:**	2
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 points, No= 0 Points, NI=1 Point) **Comments:**	2
5	**General Comments:**	8

G – FIELD INSPECTIONS		
1	Operator, Inspector, Location, Date and PHMSA Representative • **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)** **Comments:**	
2	Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? (F2) (Yes= 1 point, No= 0 Points) **Comments:**	1
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) (Yes= 2 points, No= 0 Points, NI=1 Point) **Comments:**	2
4	Did the inspector thoroughly document results of the inspection? (F4) (Yes= 2 points, No= 0 Points, NI=1 Point) **Comments:**	2
5	Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps,pyrometer,soap spray,CGI,etc.) (F5) (Yes= 1 point, No= 0 Points) **Comments:**	1
6	Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) (F7) • **Procedures** • **Records** • **Field Activities/Facilities** • **Other (please comment)** (Yes= 2 points, No= 0 Points, NI=1 Point) **Comments:**	2
7	Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) (F8) (Yes= 2 points, No= 0 Points, NI=1 Point) **Comments:**	2
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 point, No= 0 Points) **Comments:**	1
9	During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable) (F10) (Yes= 1 point, No= 0 Points) **Comments:**	1

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**	12
	Field Observation Areas Observed (check all that apply)	

Abandonment	
Abnormal Operations	
Break-Out Tanks	
Compressor or Pump Stations	
Change in Class Location	
Casings	
Cathodic Protection	
Cast-iron Replacement	
Damage Prevention	
Deactivation	
Emergency Procedures	
Inspection of Right-of-Way	
Line Markers	
Liaison with Public Officials	
Leak Surveys	
MOP	
MAOP	
Moving Pipe	
New Construction	
Navigable Waterway Crossings	
Odorization	
Overpressure Safety Devices	
Plastic Pipe Installation	
Public Education	
Purging	
Prevention of Accidental Ignition	
Repairs	
Signs	
Tapping	
Valve Maintenance	
Vault Maintenance	
Welding	
OQ - Operator Qualification	
Compliance Follow-up	
Atmospheric Corrosion	
Other	

H – INTERSTATE AGENT STATE (if applicable)		
1	Did the state use the current federal inspection form(s)? (C1) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
2	Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? (C2) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
3	Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? (C3) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
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) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
5	Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (C5) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
6	Did the state give written notice to PHMSA within 60 days of all probable violations found? (C6) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
7	Did the state initially submit documentation to support compliance action by PHMSA on probable violations? (C7) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
8	**General Comments:**	7

I - 60106 AGREEMENT STATE (if applicable)		
1	Did the state use the current federal inspection form(s)? (B21) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
2	Are results documented demonstrating inspection units were reviewed in accordance with state inspection plan? (B22) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
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) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
4	Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (B24) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
5	Did the state give written notice to PHMSA within 60 days of all probable violations found? (Yes= 1 point, No= 0 Points, NI=.5 point) (B25) **Comments:**	1
6	Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? (B26) (Yes= 1 point, No= 0 Points, NI=.5 point) **Comments:**	1
7	**General Comments:**	6