



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue SE
Washington DC 20590

2019 Gas State Program Evaluation

for

CT Dept of Energy and Env Protection

Document Legend

PART:

- O -- Representative, Dates and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- State Qualifications
- D -- Program Performance
- E -- Field Inspections
- F -- Damage prevention and Annual report analysis
- G -- Interstate Agent/Agreement States



2019 Gas State Program Evaluation -- CY 2019

Gas

State Agency: Connecticut

Rating:

Agency Status:

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

Date of Visit: 06/01/2020 - 06/10/2020

Agency Representative: Karl Baker, Public Utilities Supervisor of Technical Analysis

PHMSA Representative: Agustin Lopez, State Liaison

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

Name/Title: Marissa Paslick Gillett, Chairman

Agency: Public Utilities Regulatory Authority

Address: 10 Franklin Square

City/State/Zip: New Britain, CT 06051

INSTRUCTIONS:

Complete this evaluation in accordance with the Evaluator Guidance for conducting state pipeline safety program evaluations. The evaluation should generally reflect state program performance during CY 2019 (not the status of performance at the time of the evaluation). 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 appropriate notes/comments section. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and they OBJECTIVELY reflect the state's program performance for the question being evaluated. Increasing emphasis is being placed on how the state pipeline safety programs conduct and execute their pipeline safety responsibilities (their performance). This evaluation, together with selected factors reported in the state's annual progress report attachments, provide the basis for determining the state's pipeline safety grant allocation.

Scoring Summary

PARTS	Possible Points	Points Scored
A Progress Report and Program Documentation Review	0	0
B Program Inspection Procedures	15	15
C State Qualifications	10	10
D Program Performance	50	50
E Field Inspections	15	15
F Damage prevention and Annual report analysis	4	4
G Interstate Agent/Agreement States	0	0
TOTALS	94	94
State Rating		100.0



PART A - Progress Report and Program Documentation Review

Points(MAX) Score

1 Were the following Progress Report Items accurate?

Info Only Info Only

Info Only = No Points

- a. Stats On Operators Data - Progress Report Attachment 1
- b. State Inspection Activity Data - Progress Report Attachment 2
- c. List of Operators Data - Progress Report Attachment 3*
- d. Incidents/Accidents Data - Progress Report Attachment 4*
- e. Stats of Compliance Actions Data - Progress Report Attachment 5*
- f. List of Records Kept Data - Progress Report Attachment 6 *
- g. Staff and TQ Training Data - Progress Report Attachment 7
- h. Compliance with Federal Regulations Data - Progress Report Attachment 8
- i. Performance and Damage Prevention Question Data - Progress Report Attachment 10*

Evaluator Notes:

- a. Verified operator data with PDM and annual reports and the data is accurate.
- b. Verified inspection data with CT data and spreadsheet and the inspection days and activity are accurate.
- c. Reviewed PDM and annual reports to verify operator data. The data on Progress Report is accurate.
- d. There were no reportable incidents in CT in 2019. Verified in PDM.
- e. Reviewed CT reports and data to verify compliance actions submitted in Progress Report.
- f. CT lists all reports and records kept in their files.
- g. Verified inspector qualifications with T&Q Blackboard.
- h. State has automatic adoption of rules.
- i. CT has performance and damage prevention activities in attachment 10. They are maintaining the accelerated cast iron and bare steel replacement programs. Working to receive a 100% score in future evaluations as they have in the past.

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



- | | | | |
|----------|---|---|---|
| 1 | Do written procedures address pre-inspection, inspection and post inspection activities for each of the following inspection types: Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspections
b. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually)
c. OQ Inspections
d. Damage Prevention Inspections
e. On-Site Operator Training
f. Construction Inspections (annual efforts)
g. LNG Inspections | | |

Evaluator Notes:

CT DEEP Admin Procedures include procedures for conducting all types of inspections which includes DIMP, TIMP, Standard, OQ, Damage Prevention, Operator Training, Construction and LNG. Procedures give guidance to inspectors on how to perform inspections which includes pre and post inspection activities.

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|----------|--|---|---|
| 2 | Do written procedures address inspection priorities of each operator, and if necessary each unit, based on the following elements and time frames established in its procedures? Chapter 5.1
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| | a. Length of time since last inspection
b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)
c. Type of activity being undertaken by operators (i.e. construction)
d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.)
e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors)
f. Are inspection units broken down appropriately? | | |

Evaluator Notes:

Yes, Section 10 of CT DEEP Administrative Procedures includes procedures that address the prioritization of inspections. It takes the following into consideration:

- (a) The length of time since the last inspection
- (b) The operating history of the inspection unit (leak history, unaccounted-for gas, prior violations, accident/incident history, any other information available from the Operator's annual reports, etc.
- (c) Types of activities being undertaken by the inspection unit (construction, recent changes in personnel and procedures, etc.)
- (d) Locations of Operator's inspection units being inspected - (Geographic area, Population Density, etc.
- (e) Threats to the facilities (Excavation damage, corrosion, natural forces, other outside forces, material or welds, equipment, operations)
- f) Yes, Section 6 defines an inspection unit.

- | | | | |
|----------|---|---|---|
| 3 | (Compliance Procedures) Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
| | a. Procedures to notify an operator (company officer) when a noncompliance is identified
b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns
c. Procedures regarding closing outstanding probable violations | | |

Evaluator Notes:

Yes, the CT DEEP Administrative Procedures Section 12, 13 and 14 address the steps taken from the discovery to the resolution of probable violations.

- a. Notifications are sent to company officials.



- b. Routinely review the progress of compliance actions.
- c. Procedures address the closure of probable violations.

- 4** (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident? 3 3
 Yes = 3 No = 0 Needs Improvement = 1-2
- a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports
 - b. If onsite investigation was not made, do procedures require on-call staff to obtain sufficient information to determine the facts to support the decision not to go on-site.

Evaluator Notes:

- Yes, the CT DEEP Admin Procedures Section 21 address state actions in the event of an incident.
- a. CT DEEP Administrative Procedures Section 21. GPSU inspectors are on call to handle incident notifications 24 hours a day.
 - b. There were no reportable incidents in 2019. The CT DEEP Procedures Section 21 address the gathering of information if the decision is made not go onsite.

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

Evaluator Notes:

The CT DEEP is mainly complying with Part B of the Evaluation.

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



PART C - State Qualifications

Points(MAX) Score

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- | | | | |
|----------|--|---|---|
| 1 | Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.4
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|----------|--|---|---|
- a. Completion of Required OQ Training before conducting inspection as lead
 - b. Completion of Required DIMP/IMP Training before conducting inspection as lead
 - c. Completion of Required LNG Training before conducting inspection as lead
 - d. Root Cause Training by at least one inspector/program manager
 - e. Note any outside training completed
 - f. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1)

Evaluator Notes:

- Yes, verified training in T&Q Blackboard.
 - a.all inspectors are qualified to lead each type of inspections performed. Program Manager
 - b. inspectors who lead DIMP/IMP are qualified inspectors.
 - c. all inspectors have completed the root cause course.
 - d. Northwest Gas Association has a training school for pipeline safety which some of the inspectors attend.
 - e. Reviewed inspection reports to verify inspectors were qualified to lead the type of inspection.
-

- | | | | |
|----------|--|---|---|
| 2 | Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|----------|--|---|---|

Evaluator Notes:

Yes, Mr. Karl Baker is very knowledgeable of the pipeline safety program and regulations.

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|----------|--|-----------|-----------|
| 3 | General Comments:
Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

The CT DEEP is mainly complying with Part C of the Evaluation.

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



PART D - Program Performance

Points(MAX) Score

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- | | | | |
|----------|--|---|---|
| 1 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|----------|--|---|---|
- a. Standard (General Code Compliance)
 - b. Public Awareness Effectiveness Reviews
 - c. Drug and Alcohol
 - d. Control Room Management
 - e. Part 193 LNG Inspections
 - f. Construction (did state achieve 20% of total inspection person-days?)
 - g. OQ (see Question 3 for additional requirements)
 - h. IMP/DIMP (see Question 4 for additional requirements)

Evaluator Notes:

Yes, reviewed inspection reports and data kept by the CT DEEP to track all of previously conducted inspections. The CT DEEP is inspecting operators per their procedures. CT DEEP Admin Procedures Section 10 address interval inspection cycles.

- a. Depending on the type of operator inspections are either every other year or 5 years.
- b. PAPEI are conducted every 5 years.
- c. Drug and Alcohol are conducted every 5 years.
- d. CRM inspection are conducted every 5 years.
- e. LNG are inspected every other year.
- f. Construction inspections are conducted every year.
- g. OQ inspections are conducted every 5 years.
- h. IMP/DIMP inspections are conducted every 5 years.

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- | | | | |
|----------|---|----|----|
| 2 | 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. Do inspection records indicate that adequate reviews of procedures, records and field activities, including notes and the appropriate level of inspection person-days for each inspection, were performed?
Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
|----------|---|----|----|
- a. Standard (General Code Compliance)
 - b. Public Awareness Effectiveness Reviews
 - c. Drug and Alcohol
 - d. Control Room Management
 - e. Part 193 LNG Inspections
 - f. Construction
 - g. OQ (see Question 3 for additional requirements)
 - h. IMP/DIMP (see Question 4 for additional requirements)

Evaluator Notes:

Yes, the CT DEEP utilizes IA and PHMSA equivalent forms to document inspections. Reviewed inspection reports to verify that the forms are current and completed all portions of the corresponding inspection. Forms were adequately documented with findings and comments.

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|----------|---|---|---|
| 3 | 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 established in the operator's plan. 49 CFR 192 Part N
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

Yes the CT DEEP conducts OQ Program inspections per their procedures to verify the operators are in compliance with CFR 192.

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|---|--|---|---|
| 4 | Is state verifying operator's integrity management Programs (IMP and DIMP)? This should include a review of plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operator's plan(s). 49 CFR 192 Subpart P
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| | <ul style="list-style-type: none"> a. Are the state's largest operator(s) plans being reviewed annually? b. Are states verifying with operators any plastic pipe and components that have shown a record of defects/leaks and mitigating those through DIMP plan? c. Are the states verifying operators are including low pressure distribution systems in their threat analysis? | | |

Evaluator Notes:

- Yes, the CT DEEP conduct DIMP inspections of operators DIMP plans to verify they are in compliance with CFR 192.
- a. The CT DEEP conducts yearly DIMP implementation reviews of the larger operators.
 - b. Yes, All data on class 1 and 2 leaks are required to be submitted to the state on a monthly basis. This data is reviewed to determine trends including any plastic pipe issues. Also, during O&M audits, this is reviewed under 192.617 and during DIMP audits.
 - c. Yes the CT DEEP conduct DIMP inspection to verify the operators threat analysis.

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|---|---|---|---|
| 5 | Did the state review the following (these items are NTSB recommendations to PHMSA that have been deemed acceptable response based on PHMSA reviewing these items during the evaluation process): Chapter 5.1
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| | <ul style="list-style-type: none"> a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken; b. 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); c. 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; d. 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; e. 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; f. Operator procedures for considering low pressure distribution systems in threat analysis? g. Operator compliance with state and federal regulations for regulators located inside buildings? | | |

Evaluator Notes:

Yes, the NTSB and Advisory Bulletins questions are incorporated into their inspection forms which are reviewed during O&M Inspections.

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|---|--|---|---|
| 6 | Did the State verify Operators took appropriate action regarding advisory bulletins issued since the last evaluation? (Advisory Bulletins Current Year)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

Yes, Advisory Bulletins are incorporated into the inspection forms and are verified by the inspectors.

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|---|---|----|----|
| 7 | (Compliance Activities) 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
Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
| | <ul style="list-style-type: none"> a. Were compliance actions sent to company officer or manager/board member if municipal/government system? | | |

- b. Were probable violations documented properly?
- c. Resolve probable violations
- d. Routinely review progress of probable violations
- e. Did state issue compliance actions for all probable violations discovered?
- f. Can state demonstrate fining authority for pipeline safety violations?
- g. Does Program Manager review, approve and monitor all compliance actions?
(note: Program Manager or Senior Official should sign any NOPV or related enforcement action)
- h. Did state compliance actions give reasonable due process to all parties?
Including "show cause" hearing, if necessary.
- i. Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns
- j. Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. (Incident investigations do not need to meet 30/90-day requirement)

Evaluator Notes:

Reviewed randomly selected Inspection Reports to verify compliance information.

- a. Yes, compliance actions are sent to company/government officials.
- b. Yes, probable violations are documented on inspection reports and compliance letters.
- c. Yes, compliance actions are resolved in a timely manner.
- d. Yes, the PM reviews progress of probable violations.
- e. Yes, all probable violations found had compliance actions.
- f. Yes the CT DEEP issues civil penalties.
- g. Yes, the PM signs all correspondence.
- h. Yes, all parties are given due process.
- i. Yes, post inspection briefing is performed within 30 days of completing the inspections.
- j. Yes, operator is notified of probable violations within 90 days of completing inspections.

8 (Incident Investigations) Were all incidents investigated, thoroughly documented, with conclusions and recommendations? 10 10

Yes = 10 No = 0 Needs Improvement = 1-9

- a. Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports?
- b. Did state keep adequate records of Incident/Accident notifications received?
- c. If onsite investigation was not made, did the state obtain sufficient information from the operator and/or by means to determine the facts to support the decision not to go on site?
- d. Were onsite observations documented?
- e. Were contributing factors documented?
- f. Were recommendations to prevent recurrences, where appropriate, documented?
- g. Did state initiate compliance action for any violations found during any incident/accident investigation?
- h. Did state assist Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA?
- i. Does state share any lessons learned from incidents/accidents?

Evaluator Notes:

There were no reportable incidents in 2019 but the CT DEEP does have a mechanism and procedures to investigate incidents and thoroughly document. Procedures are in Section 21 of the CT Admin Procedures. The CT DEEP shares lessons learned during the annual NAPS Eastern Region Meeting.

9 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 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

There was no response necessary.

10 Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5 Info Only Info Only
Info Only = No Points

Evaluator Notes:

The CT DEEP co-hosts a New England area seminar with other states. A seminar was conducted on October 9-10 in Meredith, NH.

11 Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission? Info Only Info Only
Info Only = No Points

Evaluator Notes:

There are no transmission operators in the state. The CT DEEP does review NPMS data during interstate operators.

12 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). 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Communications occur with all operators on a regular basis. CT attends and communicates information at Call Before You Dig Board of Directors meetings and Public Awareness meetings. CT attends and provides training at operator training sessions with local officials including fire departments. CT participates in the Northeast Gas Association CT Advisory Group meetings as well. PURA maintains a website that has access to all docketed matters which include all pipeline safety and One-Call enforcement proceedings.

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

Evaluator Notes:

There were no SRCR submitted by operators in 2019 in CT.

14 Was the State responsive to: 1 1
Yes = 1 No = 0 Needs Improvement = .5
a. Surveys or information requests from NAPS or PHMSA;
b. Operator IM notifications; and
c. PHMSA Work Management system tasks?

Evaluator Notes:

Yes, Mr. Karl Baker responds to NAPS and PHMSA surveys. The CT DEEP also responds to all Management system tasks assigned to CT DEEP.

15 If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate. 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

There are no waivers that have been issued by CT DEEP.

16 Were pipeline program files well-organized and accessible? Info Only Info Only
Info Only = No Points

Evaluator Notes:

Yes, CT DEEP keeps electronic files which are protected and accessible to CT DEEP.

17 Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT). Has the state updated SICT data? 3 3

Yes = 3 No = 0 Needs Improvement = 1-2

Evaluator Notes:

SICT data was updated prior to the deadline established by PHMSA. Slight change from 415 to 408 inspection person-days due to 1 LPG operator with 2 inspection units leaving the jurisdictional propane business. Substantial inspection person-days for construction. CT's SICT data was reviewed and no issues identified.

- 18** Discussion on State Program Performance Metrics found on Stakeholder Communication Info Only Info Only
site.\ <http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805>
Info Only = No Points

Evaluator Notes:

Program Manager reviews the metrics annually. All trends are heading in the correct direction. Issues were found with the TQ data and the wording on leak management during the 2020 review. Concerns were sent to PHMSA and the data and wording has been corrected.

- 19** Did the state encourage and promote operator implementation of Pipeline Safety Management Systems (PSMS), or API RP 1173? This holistic approach to improving pipeline safety includes the identification, prevention and remediation of safety hazards. Info Only Info Only
Info Only = No Points
a. <https://pipelinesms.org/>
b. Reference AGA recommendation to members May 20, 2019

Evaluator Notes:

CT is working with NGA in standing up a PSMS program for the Northeast operators. CT has been attending the PSMS NGA meetings and providing input from a regulators perspective. All 3 CT LDCs are implementing PSMS.

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

Evaluator Notes:

The CT DEEP is mainly complying with Part D of the Evaluation.

Total points scored for this section: 50
Total possible points for this section: 50



- 1** Operator, Inspector, Location, Date and PHMSA Representative (enter specifics into the Info Only Info Only comments box below) Info Only Info Only
 Info Only = No Points
- a. What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc)
 - b. When was the unit inspected last?
 - c. Was pipeline operator or representative present during inspection?
 - d. Effort should be made to observe newest state inspector with least experience

Evaluator Notes:
 Yankee Gas (Eversource)
 Mr. Bruce Benson, CT DEEP
 October 27-29, 2020
 Agustin Lopez, PHMSA State Programs

- a. OQ Plan inspection.
- b. Last OQ Inspection was in 2015.
- c. Yes representatives were present during the inspection.
- d. Mr. Bruce Benson has been with the CT DEEP for over 20 years but hasn't been evaluated in previous years.

Evaluated Mr. Bruce Benson while he preformed an OQ Plan inspection. The inspection and evaluation were conducted virtually thru TEAMS due to the ongoing pandemic.

- 2** 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) 2 2
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:
 Yes, the inspector utilized IA as a guide and to document the inspection results.

- 3** Did the inspector adequately review the following during the inspection 10 10
 Yes = 10 No = 0 Needs Improvement = 1-9
- a. Procedures (were the inspector's questions of the operator adequate to determine compliance?)
 - b. Records (did the inspector adequately review trends and ask in-depth questions?)
 - c. Field Activities/Facilities (did inspector ensure that procedures were being followed, including ensuring that properly calibrated equipment was used and OQ's were acceptable?)
 - d. Other (please comment)
 - e. Was the inspection of adequate length to properly perform the inspection?

Evaluator Notes:
 a. Reviewed the OQ Plan for compliance with Part 192.
 b. Reviewed OQ records to verify qualification of employees.
 c. There was on field portion evaluated due to the type of inspection and the on going pandemic.
 d. No other type of inspection was performed.
 e. Yes, the inspection length was adequate.

- 4** From your observation did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) 2 2
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:
 Yes, Mr. Bruce Benson is very knowledgeable of the pipeline safety program and regulations.



- 5 Did the inspector conduct an exit interview, including identifying probable violations? (If inspection is not totally completed the interview should be based on areas covered during time of field evaluation) 1 1
 Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, Mr. Bruce Benson concluded the OQ inspection with an exit briefing of issues/findings with the operator. The following were issues/concerns discussed in the exit briefing which may or may not be issued as probable violations.

Spelling of words in the OQ Plan.

Inconsistent use of words.

Need to improve description of failing Performance Evaluation.

If all necessary AOCs are included in their specific tasks, What is this task covering that the specific task does not. Consider removing task if AOCs are in each task.

QA/QC: OQs are checked as a single box, no indication of what tasks were observed.

Yankee needs to document what tasks are observed and qualifications verified

The OQ Form needs to be used when all questionable performance is suspected. OQ Form currently only required when qualifications are suspended/revoked.

Yankee shall modify their procedure to require documentation of any questionable performance. Documentation is required whether OQs are suspended/revoked or on-site review/counselling is the necessary corrective action

Yankee needs to ensure the annual review / approval / sign-off is performed and documented.

- 6 Was inspection performed in a safe, positive, and constructive manner ? Info Only Info Only
 Info Only = No Points
- a. No unsafe acts should be performed during inspection by the state inspector
 - b. What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)
 - c. Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)
 - d. Other

Evaluator Notes:

Yes, Mr. Bruce Benson conducted the inspection in a safe, positive and constructive manner. With the ongoing pandemic he performed the inspection virtually to avoid contact and spreading of the virus.

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

Evaluator Notes:

Mr. Bruce Benson has been with the CT DEEP for many years and is very knowledgeable of the pipeline safety program. He performed an excellent job and was very professional.

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



PART F - Damage prevention and Annual report analysis

Points(MAX) Score

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- | | | | |
|----------|--|---|---|
| 1 | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues.
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

Review and analysis of Operator Annual Reports performed annually (see PIPEDATA.XLS located in S:\GasPipelineSafetyUnit\GASPIPE\Undergrnd Facilities).

As part of investigation of incidents/accidents, incident/accident data is reviewed for accuracy and to ensure that operators correctly file appropriate PHMSA incident forms.

Trends, program effectiveness and a check for operator issues is performed by using leak response time data, class 2 and 3 leak backlog data, third-party damage data and cast iron/bare steel replacement program data.

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- | | | | |
|----------|--|---|----|
| 2 | Has the state verified that the operators analyze excavation damages for the purpose of determining root causes and minimizing the possibility of a recurrence? (? 192.617)
Has the state verified that the operators have appropriately identified excavators who have repeatedly violated one-call laws and damaged their facilities. Have the operators taken steps to mitigate that risks? (? 192.1007)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | NA |
|----------|--|---|----|

Evaluator Notes:

Review of operator's damage prevention programs occurs during biennial Operations and Maintenance audits. CT Regulation 16-345-3(a)(6) requires operators report to the Authority any excavator whose actions or frequency of damages might require particular attention, this is verified during O&M audits.

CT Regulations require all damages be reported to PURA, and reports all require a root cause to be established.

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- | | | | |
|----------|---|---|----|
| 3 | Has the state reviewed the operator's annual report pertaining to Part D ? Excavation Damage?
Yes = 4 No = 0 Needs Improvement = 1-3 <ol style="list-style-type: none">a. Is the information complete and accurate with root cause numbers?b. Has the state evaluated the causes for the damages listed under "One-Call Notification Practices Not Sufficient" (Part D.1.a)?c. Has the state evaluated the causes for the damages listed under "Locating Practices Not Sufficient" (Part D.1.b)? For each operator, does the state review the following?d. Is the operator or its locating contractor(s) qualified and following written procedures for locating and marking facilities?e. Is the operator appropriately requalifying locators to address performance deficiencies?f. What is the number of damages resulting from mismarks?g. What is the number of damages resulting from not locating within time requirements (no-shows)?h. Is the operator appropriately addressing discovered mapping errors resulting in excavation damages?i. Are mapping corrections timely and according to written procedures?j. Has the state evaluated the causes for the damages listed under "Excavation Practices Not Sufficient" (Part D.1.c)? | 4 | NA |
|----------|---|---|----|

Evaluator Notes:

CT has comprehensive mandatory damage reporting for all utilities. Annual reports reviewed to ensure numbers correlate with damages reported to State.

All damage data is reported through online system run by CBYD, then data exported to the GPSU for processing and analysis. The data is stored in an Access database that is used to facilitate the enforcement program. Summary data is also exported to Excel spreadsheets that are used to analyze for trends.



During biennial Operations and Maintenance audits, damages that were caused by records issues are checked to ensure that records were corrected appropriately.

The State's enforcement process takes into account the history of markout errors as a factor in determining the amount of civil penalty. The State carefully monitors, on a monthly basis, the markout performance of all gas operators (as well as all other utilities).

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- | | | | |
|----------|--|---|---|
| 4 | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests?
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|
- a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.
 - b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages?
 - c. Has the state evaluated which of the following best describes the reason for the excavation damages; i.e., operator or contractor not following written procedures, failure to maintain marks, failure to support exposed facilities, failure to use hand tools were required, failure to test-hole (pot hole), improper backfilling practices, failure to maintain clearance or insufficient excavation practices.
 - d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?

Evaluator Notes:

The State collects and analyzes damage data for all utilities. Some of the trends that are reviewed are damage per thousand locate requests, damage by cause, damage by utility industry, damage by county, no-notice damage by county, markout error by company and many others. Starting in 2018, CT started utilizing a new damage reporting system that collects much more information, mirroring the data that DIRT collects. With this, the State analyzes data on a multitude of factors.

In 2019, damage rate for damage to pipelines is 1.31 DPTL

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

Evaluator Notes:

The CT DEEP is mainly complying with Part F of the Evaluation.

Total points scored for this section: 4
Total possible points for this section: 4



PART G - Interstate Agent/Agreement States

Points(MAX) Score

- 1** Were all inspections of interstate pipelines conducted using the Inspection Assistant program for documenting inspections. Info Only Info Only
Info Only = No Points

Evaluator Notes:

Yes, all inspections were conducted using IA, all planned questions were answered and required forms/documents were complete

- 2** If inspections were conducted independent of a PHMSA team inspection was notice of all identified probable violations provided to PHMSA within 60 days. Info Only Info Only
Info Only = No Points

Evaluator Notes:

Notification that inspection was complete and no probable violations identified was provided on time.

- 3** If inspections were conducted independent of a PHMSA team inspection was PHMSA immediately notified of conditions which may pose an immediate safety hazard to the public or environment? Info Only Info Only
Info Only = No Points

Evaluator Notes:

Notification that inspection was complete was provided on time, none included conditions that posed an immediate safety hazard.

- 4** If inspections were conducted independent of a PHMSA team inspection did the state coordinate with PHMSA if inspections not were not included in the PHMSA Inspection Work Plan? Info Only Info Only
Info Only = No Points

Evaluator Notes:

Yes, two inspections that were not specifically identified were performed: OPA, and Integrity dig. CT DEEP coordinated with PHMSA prior to inspections commencing.

- 5** Did the state take direction from and cooperate with PHMSA for all incident investigations conducted on interstate pipelines? Info Only Info Only
Info Only = No Points

Evaluator Notes:

Yes, one failure investigation was conducted by CT DEEP and cooperated with PHMSA.

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

Evaluator Notes:

The CT DEEP is mainly complying with Part G of the Evaluation.

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

