



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

FLORIDA PUBLIC SERVICE COMMISSION, Bureau of Safety

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: Florida

Agency Status:

Date of Visit: 06/01/2020 - 07/09/2020

Agency Representative: Robert Graves
Program Manager

PHMSA Representative: Clint Stephens
State Liaison

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

Name/Title: Mr. Gary Clark, Chairman
Agency: Florida Public Service Commission
Address: 2540 Shumard Oak Blvd.
City/State/Zip: Tallahassee, Florida 32399-0850

Rating:

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

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
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

0
15
10
50
15
4
0

0
15
9
46
15
4
0

TOTALS

94 89

State Rating 94.7

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:

- 1a. Information in Attachment 1 ? Progress Report seems accurate.
- 1b. Reviewed time logs for inspectors and determined inspection activity in Attachment 2 ? Progress Report seems accurate.
- 1c. Information in Attachment 3 ? Progress Report seems accurate when comparing data in Attachment 1.
- 1d. There were two incident reports not included in Attachment 4 ? Progress Report, but the information was forwarded to Carrie Winslow on February 20, 2020.
- 1e. Information in Attachment 5 ? Progress Report seems accurate.
- 1f. All records are kept electronically based on information provided by FLPSC for Attachment 6 ? Progress Report.
- 1g. Information in Attachment 7 ? Progress Report was compared with data in TQ Blackboard and found information to be accurate.
- 1h. Compliance with Federal Regulations data in Attachment 8 ? Progress Report seems accurate with five adopted rules in CY2019.
- 1i. Attachment 10 ? Progress Report the FLPSC plans to inspect all inspection units; train inspector to lead IMP inspections; FPSC does not have damage prevention authority; and legislature in process to give State Fire Marshall authority to impose/collect fines for pipeline damage.

There were no issues.

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

PART B - Program Inspection Procedures

Points(MAX) Score

- | | | | |
|---|---|---|---|
| 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 |
| | <ul style="list-style-type: none">a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspectionsb. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually)c. OQ Inspectionsd. Damage Prevention Inspectionse. On-Site Operator Trainingf. Construction Inspections (annual efforts)g. LNG Inspections | | |

Evaluator Notes:

Yes. The pre-inspection procedures for the inspection types is included in the FPSC Division Engineering SOP 1111, page 27; inspection procedures included in SOP 1111, pages 28 ? 29; and post-inspection activities are included in SOP 1111, pages 29.

- | | | | |
|---|---|---|---|
| 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 |
| | <ul style="list-style-type: none">a. Length of time since last inspectionb. 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. Written procedures address inspection priorities of each operator in the FPSC Division Engineering SOP 1111, page 27.

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|---|---|---|---|
| 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 |
| | <ul style="list-style-type: none">a. Procedures to notify an operator (company officer) when a noncompliance is identifiedb. Procedures to routinely review progress of compliance actions to prevent delays or breakdownsc. Procedures regarding closing outstanding probable violations | | |

Evaluator Notes:

Yes. FPSC procedures to identify steps to be taken from the discovery to resolution of a probable violation can be found in the FPSC Division Engineering SOP 1123, pages 54 ? 55.

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|---|--|---|---|
| 4 | (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident?
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
| | <ul style="list-style-type: none">a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reportsb. 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. FPSC procedures to address state actions in the event of an incident/accident are found in the FPSC Division Engineering SOP 1122, pages 49 ? 53.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues identified in 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

- | | | | |
|---|---|---|---|
| 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 |
| | <ul style="list-style-type: none">a. Completion of Required OQ Training before conducting inspection as leadb. Completion of Required DIMP/IMP Training before conducting inspection as leadc. Completion of Required LNG Training before conducting inspection as leadd. Root Cause Training by at least one inspector/program managere. Note any outside training completedf. 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:

FPSC staff that have not completed core courses by CY2019 were Hassan Badran, Farhan Alnajar, Luis Salvador, Bradley Kissel, and Carlos Andino.

FPSC staff qualified to lead IMP inspection in CY2019 were Karl Chen, Robert Simpson, Rudy Isaac, and Hassan Badran. There were no issues.

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|---|--|---|---|
| 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 | 4 |
|---|--|---|---|

Evaluator Notes:

Rick Moses was still Program Manager in 2019, and Robert Graves took over March 31, 2020 as Program Manager. Robert went through the New Program Manager orientation the week of May 26, 2020. However, Robert has been in position less than one year and no prior pipeline safety experience.

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

Evaluator Notes:

There was one issue identified in Part C of the program evaluation; Robert Graves took over March 31, 2020 as Program Manager. Robert went through the New Program Manager orientation the week of May 26, 2020. However, Robert has been in position less than one year and no prior pipeline safety experience.

Total points scored for this section: 9
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 | 3 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. 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:

Reviewed inspection interval data for Sebring Gas System, Inc., City of Defuniak Springs Natural Gas System, City of Sunrise, City of Gulf Breeze, City of Milton, City of Perry, Town of Havana, Lake Apopka Natural Gas District, Florida City Gas, Duke Energy ? Debrary Combustion Turbine, Peninsula Pipeline Company, Bayside Power Station, Area Housing Commission Pensacola, Ft. Walton Beach Housing Authority, Gainesville Housing Authority, and Universal Studios. The FPSC SOP procedures require Standard inspections be performed annually, not to exceed 15 months. A standard inspection on one of the Peninsula Pipeline Company units exceeded 15 months (From 3/2/2018 to 12/1/2019). The City of Defuniak Springs Natural Gas System did not have its PA, D&A, OQ, and DIMP inspections performed within 15 months (From 2/8/2018 to 8/21/19) as required in their SOP. Peninsula Pipeline Company ? Fellsmere Division did not have its OQ and D&A inspections performed within 15 months (From 3/28/2018 to 12/17/2019) as required by their SOP. FPSC had performed 31.12% construction inspections in CY2019.

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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 | 8 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. Constructiong. OQ (see Question 3 for additional requirements)h. IMP/DIMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Reviewed inspection reports for Sebring Gas System, Inc., City of Defuniak Springs Natural Gas System, City of Sunrise, City of Gulf Breeze, City of Milton, City of Perry, Town of Havana, Lake Apopka Natural Gas District, Florida City Gas, Duke Energy ? Debrary Combustion Turbine, Peninsula Pipeline Company, Bayside Power Station, Area Housing Commission Pensacola, Ft. Walton Beach Housing Authority, Gainesville Housing Authority, and Universal Studios. The O&M inspection report for City of Gulf Breeze did not have documentation included in the form to explain N/As. The DIMP inspection report for City of Milton did not have documentation included in the form to explain N/As. FPSC needs to improve on its documentation of N/As in their inspection checklist.

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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:

Reviewed inspection reports for Sebring Gas System, Inc., City of Defuniak Springs Natural Gas System, City of Sunrise, City of Gulf Breeze, City of Milton, City of Perry, Town of Havana, Lake Apopka Natural Gas District, Florida City Gas,

Duke Energy ? Debrary Combustion Turbine, Peninsula Pipeline Company, Bayside Power Station, Area Housing Commission Pensacola, Ft. Walton Beach Housing Authority, Gainesville Housing Authority, and Universal Studios. FPSC is verifying OQ programs are up to date, and that persons performing covered tasks are properly qualified and requalified. There were no issues.

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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:

Reviewed inspection reports for Sebring Gas System, Inc., City of Defuniak Springs Natural Gas System, City of Sunrise, City of Gulf Breeze, City of Milton, City of Perry, Town of Havana, Lake Apopka Natural Gas District, Florida City Gas, Duke Energy ? Debrary Combustion Turbine, Peninsula Pipeline Company, Bayside Power Station, Area Housing Commission Pensacola, Ft. Walton Beach Housing Authority, Gainesville Housing Authority, and Universal Studios. FPSC is verifying IMP and DIMP programs are up to date and monitoring progress of the programs. They have included a question in the most current inspection checklist pertaining to low pressure distribution systems. There were no issues.

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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:

- 5a. The question is included on the GS-3 O&M form page 11.
- 5b. The question is included on the GS-3 O&M form page 12.
- 5c. The question is included in the GS-3 O&M form page 4.
- 5d. The question is included in the GS-3 O&M form page 5.
- 5e. The question is included in the GS-3 O&M form page 3.
- 5f. The question is included in the PHMSA Form 24 ? DIMP Implementation Form page 4 of 31.
- 5g. The question is included in the GS-5 Pressure Regulation from page 7.

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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) | 1 | 1 |
|---|---|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

FPSC is in process of implementing a plan to email all jurisdictional operators a link to the ADBs on an annual basis so they will be able stay current and take appropriate action when necessary.

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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 |
|---|---|----|----|
- 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 inspection reports for City of Gulf Breeze, City of Milton, and Florida City Gas. Compliance actions were sent to company officers; NOPVs were documented properly, probable violations resolved, and compliance actions were monitored until closure. The FPSC issued its last fine in May 19, 2016 to TECO ? Peoples Gas. FPSC did meet the 30/90-day post inspection briefing or preliminary findings time frame with the operator.

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|---|--|----|----|
| 8 | (Incident Investigations) Were all incidents investigated, thoroughly documented, with conclusions and recommendations?
Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
|---|--|----|----|
- 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:

Reviewed incident reports included Attachment 4 ? 2019 Gas Base Grant Progress Report and the additional two that were included later. The incidents were investigated, thoroughly documented, with conclusions and recommendations. FPSC has an adequate mechanism to receive and respond to incidents. The State did not have to assist AID or Region Office, and it shares lessons learned during the NAPS regional meeting State of State address.

- 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:

Letter sent on July 16, 2019, Chairman letter received July 31, 2019. No issue.

- 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 last pipeline safety training seminar was held June 11-12, 2018.

- 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:

The question is included in the FPSC GS-13 Summary form. This is included in every inspection form.

- 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:

The Florida PSC website communicates information to effected stakeholders and the public pertaining to 811, pipeline safety program (annual reports, gas maps, etc.), and call before you dig info.

- 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:

The were no open SRCRs in the PDM for 2019.

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

Evaluator Notes:

Yes. The FPSC responded to survey requests from NASPSR and PHMSA. There have been no IM or WMS notifications.

- 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:

FPSC has not issued any waivers or special permits for any operators.

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

Evaluator Notes:

Yes. Pipeline program files were well organized and accessible electronically while performed the program evaluation remotely.

- 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:

Attachment 2 (887) and SICT (924). Did not meet SICT. FPSC inspection day information submitted was accurate and data was updated.

- 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:

Discussed the FPSC performance metrics such as, Damage prevention Program ? Distribution excavation damages per 1,000 tickets has increased from 2018 to 2019. Gas distribution incidents caused by excavation damage increased from 2017 thru 2019; Inspection Activity ? Inspection Days per 1,000-mile gas pipelines has decreased from 2018 to 2019. (Lowest since 2010); and Inspector Qualification ? Percentage of staff has decreased with Core Training; however, percentage 5-year retention has increased.

- 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:

FPSC will be discussing the implementation of Pipeline Safety Management Systems with its five big operators on an annual basis.

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

Evaluator Notes:

There were two issues identified in Part D of the evaluation; (1) The FPSC SOP procedures require Standard inspections be performed annually, not to exceed 15 months. A standard inspection on one of the Peninsula Pipeline Company units exceeded 15 months (From 3/2/2018 to 12/1/2019). The City of Defuniak Springs Natural Gas System did not have its PA, D&A, OQ, and DIMP inspections performed within 15 months (From 2/8/2018 to 8/21/19) as required in their SOP. Peninsula Pipeline Company ? Fellsmere Division did not have its OQ and D&A inspections performed within 15 months (From 3/28/2018 to 12/17/2019) as required by their SOP; and (2) The O&M inspection report for City of Gulf Breeze did not have documentation included in the form to explain N/As and the DIMP inspection report for City of Milton did not have documentation included in the form to explain N/As. FPSC needs to improve on its documentation of N/As in their inspection checklist.

Total points scored for this section: 46
Total possible points for this section: 50

PART E - Field Inspections

Points(MAX) Score

- 1 Operator, Inspector, Location, Date and PHMSA Representative (enter specifics into the comments box below) Info Only Info Only

Info Only = No Points

- What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc)
- When was the unit inspected last?
- Was pipeline operator or representative present during inspection?
- Effort should be made to observe newest state inspector with least experience

Evaluator Notes:

Kadmiel Beauvais and Carlos Andino of the FL PSC conducted a standard inspection on the Gainesville Regional Utilities Company (GSVRU). Inspection intervals were met and the operator was made aware of this inspection in January 2020.

- 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:

The PSC used the appropriate forms for the inspections conducted and had current regulation manuals with them.

- 3 Did the inspector adequately review the following during the inspection 10 10

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

- Procedures (were the inspector's questions of the operator adequate to determine compliance?)
- Records (did the inspector adequately review trends and ask in-depth questions?)
- Field Activities/Facilities (did inspector ensure that procedures were being followed, including ensuring that properly calibrated equipment was used and OQ's were acceptable?)
- Other (please comment)
- Was the inspection of adequate length to properly perform the inspection?

Evaluator Notes:

The inspectors were very thorough in reviewing and challenging the operator's O&M procedures. The inspection activities conducted included damage prevention, emergency valves and cathodic protection. A sufficient numbers of locations were evaluated to provide a representative sample of the present operating conditions.

- 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:

Kadmiel Beauvais (lead inspector) has approximately three years with the PSC. He maintained an impressive command presence and displayed a proficient understanding of the regulations and Pipeline Safety program.

- 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, the inspectors did a preliminary exit interview and shared observations. They also provided recommendations on a number of items. A second and final exit interview was scheduled for the following week.

- 6 Was inspection performed in a safe, positive, and constructive manner ? Info Only Info Only

Info Only = No Points

- 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.

Answers described in previous questions.

7

General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

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**

- | | | | |
|---|--|---|---|
| 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:

Yes. The FPSC is analyzing the data from annual reports on an annual basis looking for trends in excavation damages, incident/accident reports, hazardous leaks, and non-hazardous leaks. This data is grouped into miles of main and number of services for distribution systems and transmission operators. The data is aggregated into pipe charts showing percentages pipe material type, operator type and cause of leaks. There were no issues.

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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:

Yes. The FPSC has taken the data from annual reports and analyzed excavation damages to determine root cause. This data has been separated by operator, and was suggested the data be compared with the national average to evaluate accuracy. If data is above national average, information should be discussed with the operator during their damage prevention or public awareness inspections. The FPSC held a workshop with Florida One-Call on December 10, 2019 and February 3, 2020 discussed with its larger operators the causes for excavation damage.

- | | | | |
|---|--|---|----|
| 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:

The FPSC held a workshop with Florida One-Call on December 10, 2019 and February 3, 2020 which discussed with its larger operators the causes for excavation damages such as, excavator dug prior to verifying marks by test-hole (pot hole); no response from operator/contractor locator; deteriorated facility; marked inaccurately due to incorrect record/maps; and excavator dug after valid ticket expired. Suggest that the FPSC provides and confirms all jurisdictional operators are communicated this information.

- | | | | |
|---|---|---|---|
| 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 <ol style="list-style-type: none">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? | 2 | 2 |
|---|---|---|---|

- 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:

Yes. The FPSC has collected the data and evaluated trends on the number of pipeline damages per 1,000 locate requests. Information pertaining to stakeholder group causing the highest number of damages to the pipeline is stored in the CGA DIRT dashboard. Sunshine 811 has utilized CGA DIRT and Florida Virtual Private DIRT data and has surveyed stakeholders to identify damage prevention training needs and has developed training programs to address those needs such as; Safety Matters, Positive Response System, and ITE System training programs.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues identified in 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:

FPSC does not have an interstate agreement.

- 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:

FPSC does not have an interstate agreement.

- 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:

FPSC does not have an interstate agreement.

- 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:

FPSC does not have an interstate agreement.

- 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:

FPSC does not have an interstate agreement.

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

Evaluator Notes:

FPSC does not have an interstate agreement.

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