



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

PENNSYLVANIA PUBLIC UTILITY COMMISSION

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: Pennsylvania

Agency Status:

Date of Visit: 05/05/2020 - 05/07/2020

Agency Representative: Robert Horensky, Fixed Utility Valuation Manager; David Kline, Fixed Utility Valuation Engineer Supervisor; Sunil Patel, Fixed Utility Valuation Engineer III, Jim Harchar, Fixed Utility Valuation Engineer I

PHMSA Representative: David Lykken, Transportation Specialist

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

Name/Title: Ms. Gladys Brown Duntrieuille, Chairman

Agency: Pennsylvania Public Utility Commission

Address: 400 North Street

City/State/Zip: Harrisburg, PA 17120

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
10
41
15
4
0

TOTALS

94 85

State Rating

90.4

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 review of the random operator generated list for CY2019-2023 revealed a number entry errors and exclusions on Attachment 3. The program will need to verify operator data submitted to the PMD and reconcile with their own data, make corrections where needed, and submit a revised Attachment 3 to State Programs.

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:

- a. Standard inspection procedures located in the Pennsylvania Public Utility Commission Gas Safety Inspector Handbook (Rev 2/2020) on page 11. Inspection protocols are listed on page 15. Pre and Post inspection instructions addressed on page 13 outline steps for all inspections completed by the Division.
- b. Gas IMP inspection procedures beginning on page 28. DIMP inspection procedures page 14.
- c. OQ inspection procedures on page 28/29.
- d. Damage Prevention inspection procedures page 15.
- e. Operator Training inspection activities procedures page 9
- f. Construction Inspections beginning on page 18. Plastic pipe construction page 30, steel pipe construction is found on page 33 and Compressor Station Construction page 18.
- g. LNG Beginning on Page 30. Also page 51 Physical Activities under Work Environment section.

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

Length of time between inspections not to exceed five years (LNG - 3 Yrs). Inspection plan schedule for operators and inspection units is consistent with the priorities described in the procedures (Attachment 4). Four methods used. 1) Risk formula 2) length of time since last 3) Construction workload 4) Staff analyst review of inspection data requested and collected from operators (Annual FL-XX letter).

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

Procedures for closing out outstanding PV's under Inspection and Enforcement Program beginning on Page 42. Enforcement Procedures starting on page 45. Notification to company official noted on Page 46. Routine review of progress of compliance actions covered under Non-Compliance Follow Up Procedures, Page 31 and Page 44 (Documentation).

-
- | | | | |
|---|--|---|---|
| 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. Page 23 - Non Reportable Failure Investigation, Facility Damage page 26, Reportable Failure Investigations page 36. Pipeline operators contact the regional PA-PUC supervisor or default to one of the inspection staff assigned to that area to report incidents. All operators have PA PUC staff contact information. Process appears to work satisfactory. Program Manager is familiar and understands the MOU between the NTSB and PHMSA (Attachment 2) and Federal/State cooperation in case of incidents (Attachment 3).

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

Evaluator Notes:

The PAPUC Pipeline Safety Handbook contains baseline procedures as required for conducting it pipeline safety inspection and enforcement program. It is recommended that more attention be devoted to providing additional detail in its written procedures which reflect the detailed processes used and high quality the overall program.

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:

Yes. No issues noted. a. Inspectors have completed the PL-3622 OQ training necessary for conducting OQ inspections. b. Inspection staff who have conducted IM inspections as lead have completed all necessary T&Q training. c. Inspectors have completed LNG training. d. 13 inspectors including PM have completed Root Cause training. f. lead inspectors have met minimum qualifications for leading Std insps. PM has completed all required courses.

- | | | | |
|---|--|---|---|
| 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. New PM has been with the safety program since 2013. Is familiar with PHMSA programs and regulations.

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

Evaluator Notes:

No issues.

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



PART D - Program Performance

Points(MAX) Score

- | | | | |
|---|---|---|---|
| 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 | 0 |
| | <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:

No. All operator/units not inspected within timeframes established. No record of PAPEI, OQ, IM, D&A CRM inspections being conducted for certain identified operators. Refer to Operator Random Generated Selection List for details.

- | | | | |
|---|---|----|----|
| 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 |
| | <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:

Yes. Database contractor formally tasked with maintaining forms to ensure content was up to date. Program currently working on improving their inspection process and forms including developing process to include the establishment of some basic version control guidelines such as the inclusion of "document dates" and "version numbers" to ensure that staff is using the most up to date inspection forms.

- | | | | |
|---|---|---|---|
| 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 | 0 |
|---|---|---|---|

Evaluator Notes:

No. No OQ (Plan or Field) inspections on record for CE Dunmire Gas, Granger Energy, Pike County L&P, Somerset Gas Gathering. Also others not completed prior to CY2019. Refer to Operator Random Generated Selection list for details.

- | | | | |
|---|---|---|---|
| 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 | 0 |
| | <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:

No. No IM (Plan or Field) inspections on record for CE Dunmire Gas, Granger Energy, Somerset Gas, National Fuel Gas, Williams MLP, IMG Energy. Refer to Operator Random Generated Selection list for details.

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
	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. Mass Data request letter FL-1-19 sent out at the beginning of the year. 32 data points requested from operators covering NTSB, PHMSA, and State recommendations, advisories, and other areas of emphasis. Operators submit data electronically via the PUC's web site. Submissions reviewed, tabulated, and incorporated into the programs risk model. Items a thru e also covered in relevant inspection checklists.

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. As noted under D.5. Reviews annual FL-1-XX letter submissions and via applicable inspection checklists.

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:

Yes. 61 non-compliance letters reviewed. Certain inspections conducted over several months so NC letters covered the entire inspection period. According to PM the operator is notified immediately and issues discussed with management at the time a PV identified. Suggested staff document those communications in inspection reports and final NC letters. 1 exceeding the 90 day requirement by 7 days for the period ending May 31, 2019. Last civil penalty assessed was in CY2018. None in CY2019.

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:

Yes. a. Pipeline operators contact the regional PA-PUC supervisor or default to one of the inspection staff assigned to that area to report incidents. All operators have PA PUC staff contact information. b. Yes. Reviewed six incident reports generated. Reports were detailed and included photographs. c. All reportables were responded to. d & e. Yes. g. Yes, When applicable. h. The program maintains communications with PHMSA AID and Eastern Region office during reportable events. I. Yes, during seminars and annual NAPSRS meetings.

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:

Yes. State Programs letter went out on 6/7/19. Chair's response received on 7/19/2019. Concerns expressed on PR scoring deductions related to facility jurisdiction authority and field inspection day requirement. Both have been rectified. Issue with inspector field performance rectified.

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:

Annual Seminars. Reviewed agenda for CY2019 seminar.

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:

Mass Data request letter FL-1-19 at the beginning of the year. Also addressed in inspection checklists.

- 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:

Yes. As noted in prior evaluations. Meetings held with operators semi-annually. A public documents page is provided on the PA-PUC web site to search for enforcement case information.

- 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:

Yes. 2 SRC's reported in CY2019. Staff investigation reports reviewed. Both updated and closed out utilizing the WMS.

- 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. No issues noted.

- 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:

No new waivers issued in CY2019. One open waiver. 7/10/2019 follow-up inspection #11359

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

Evaluator Notes:

Yes. No issues. Program evaluation conducted remotely. Documents were provided in a timely manner. Program has a robust database for accessing needed information.

- 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:

Discussed shortfalls in not meeting inspection intervals. Program to re-evaluate needs and update SICT as necessary. Program did hire five inspectors in CY2019. May hire four additional if approved but currently under a hiring freeze.

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

Evaluator Notes:

Yes. Discussed performance metrics. The PA-PUC metrics appeared to be at reasonable performance levels. Excavation damages per 1000 tickets (requested) ticked down slightly from 2018 still averaging approximately 2.2 damages in CY2019. Inspection days per 1000 miles significantly up from CY2018 (14 days) averaging approximately 19.5 days in CY2019. Inspector Qualification core training at almost 80%. 5 year retention percentage dropped below 50% due to hiring of new inspection staff. Number of total leaks eliminated/repaired averaging 280 for CY2019. CI and Bare Steel replacement programs on going. The average number of outstanding leaks remains low as a result.

- 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:

Yes. Discussed as part of operator seminars.

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

Evaluator Notes:

D.1 - Five point deduction for all operator/units not inspected within timeframes established. No record of PAPEI, OQ, IM, D&A CRM inspections conducted for certain identified operators.
D.3 - Two point deduction for no OQ (Plan or Field) inspections on record for CE Dunmire Gas, Granger Energy, Pike County L&P, Somerset Gas Gathering. Also others not completed prior to CY2019.
D.4 - Two point deduction for no IM (Plan or Field) inspections on record for CE Dunmire Gas, Granger Energy, Somerset Gas, National Fuel Gas, Williams MLP, IMG Energy.

Total points scored for this section: 41
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 = 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:

- A standard inspection of PECO Energy's Merick Transmission pipeline conducted over remotely via Skype. b. Last inspected in 2018. c. Yes, the operator was represented via Skype and telephone. Lead inspector Scott Orr has approximately 3.5 years in the program.
- A records inspection of Philadelphia Gas Works SW District Regulator Stations and Emergency Valves conducted remotely via Skype. Last inspected in 2019. Operator was present. Lead inspector Elena Bozhko has been with the program since 2016.

- 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)

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

- Yes. PAPUC "Transmission Line Inspection" form was utilized in addition to the PHMSA Form 5 for supplemental questions where needed.
- Yes. PAPUC District Regulator & Emergency Valve inspection forms utilized.

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

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:

- & 2. Yes. Inspectors had reviewed and had available procedures for field activities of which records were reviewed during Skype sessions. Several issues identified during inspections. 1c. Calibration records for instruments where notated on maintenance records were reviewed. Inspections were of reasonable length.

- 4 From your observation did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable)

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

- & 2. Yes. Inspectors demonstrated adequate knowledge.

- 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)

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

- Yes. PV's identified issues related to ROW Leak Survey records, Corrosion Protection surveys/records, Odorization testing records, and Exposed Pipe Report records of direct assessments performed by contractor; Meter protection; Pipeline Markers;

Emergency Response plans; and Odorization.

2, Yes. Potential issue related to certain emergency valves identified by the operator as "not operable" but remain on list.

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:

Inspections conducted remotely via Skype. The quality of questions asked and ancillary probing by the inspectors was proportionate to their respective training and experience. The inspectors conducted themselves in a courteous and professional manner.

7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Zero point deductions. No issues identified.

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. Operator's annual reports and results recorded into the risk assessment spreadsheet. Spreadsheet reviewed.

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

N/A. New question. No points scored for this evaluation period. Discussed with PM the 3/5/20 email from D. Appelbaum highlighting the need to dive deeper into operator annual report submittals related to excavation safety practices and the need to hold operators accountable.

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

N/A. New question. No point scored for this evaluation year. Discussed with PM the 3/5/20 email from D. Appelbaum highlighting the need to dive deeper into operator annual report submittals related to excavation safety practices and the need to hold operators accountable.

- | | | | |
|---|---|---|---|
| 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?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? | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Yes, The program issues a letter to all operators in the first quarter of each year. The letter (FL 1-19) lists this question. Excavation damages per 1000 tickets (requested) which have trended slightly upward since 2010 is now averaging approximately 2.1 - 2.2 damages between since CY2017.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

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:

N/A. Does not have a interstate agent or 60106 agreement in place.

- 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:

N/A. Does not have a interstate agent or 60106 agreement in place.

- 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:

N/A. Does not have a interstate agent or 60106 agreement in place.

- 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:

N/A. Does not have a interstate agent or 60106 agreement in place.

- 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:

N/A. Does not have a interstate agent or 60106 agreement in place.

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

Evaluator Notes:

Does not have a interstate agent or 60106 agreement in place.

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