



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

PR Department of Transp. and Public Works

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: Puerto Rico

Agency Status:

Date of Visit: 06/08/2020 - 06/12/2020

Agency Representative: Alice Velazquez, Pipeline Safety Program Manager
Zuleika Ruiz, Inspector

PHMSA Representative: Glynn Blanton, US DOT/PHMSA State Evaluator

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

Name/Title: Carlos M. Contreras, Secretary

Agency: Department of Transportation and Public Works

Address: PO Box 41269, Minillas Station

City/State/Zip: San Juan, Puerto Rico 00940-1269

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
14
9
50
15
4
0

TOTALS

94 92

State Rating **97.9**

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. PR DTOPW has jurisdictional authority over seven LPG and one Intrastate transmission operators. Information in Pipeline Data Mart (PDM) confirm the operator types.
- b. Reviewed and determined most of the inspections are standard with a few follow-ups.
- c. List of operators and inspection units match Attachment 1.
- d. Reviewed PDM and found no incidents occurred in CY2019. This confirmed information listed in Attachment 4.
- e. The number of carryovers 22 is incorrect in comparing to last year's progress report. This number should be 10 and will affect the numbers to be corrected at end of year. This item will need to be corrected with an email to Carrie Winslow.
- f. Based on last year's review of inspection files and folders the information listed in attachment 6 is correct.
- g. A review of TQ Blackboard minimum training records confirm Alice Velazquez and Zuleika Ruiz have completed all courses for standard gas inspector. It was noted Samuel Gonzalez is listed as an active student although not employed by PR DTOPW.
- h. PR DTOPW civil penalties are not essentially the same as PHMSA and loss of points occurred during the progress report reviews.
- i. Attachment 10 is not a copy paste from last's year document.

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:

Items a thru f are addressed in Puerto Rico Department of Transportation and Public Works (PR DTPW) Pipeline Safety Administrative Procedures revised May 16, 2019, on page 5 under "Activities before, during and after an inspection". PR does not have an LNG facility jurisdictional to their agency.

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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 |
| | <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, PR DTPW Pipeline Safety Administrative Procedures address and list items "a thru e" on inspection priorities for each operator under "AMOUNT OF INSPECTIONS" on page 7. A review of Distribution Operators Units listed in the procedures confirm inspection units are broken down correctly except for Del Gas Corp who has listed Lot 23 twice. This item will need to be corrected with an email to Carrie Winslow changing the inspection units from two to one.

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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 | 2 |
| | <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:

Item a is mentioned in PR DTPW Pipeline Safety Administrative Procedures under Sub-title, Notification of A Probable Violation/Warning Letter page 9.

Item b is not clearly identified in the procedures. On page 9, it states "The Pipeline Safety Program will follow up on potential violations as soon as possible, given the resources available". Written procedures lack specific detail to routinely review progress of compliance action. This item was listed in last year's program evaluation Part D - Compliance Activities, Question D.1 (b): as "Needs Improvement". A loss of half point occurred.

Item c is not clearly identified in the procedures. On page 9 it states, " In the event the probable operator violation is not

resolved, monitoring will continue until a resolution is reached." Written procedures need to contain specific information on closing probable violations. This item was listed in last year's program evaluation Part D-Compliance Activities, Question D.1 (c): "Needs Improvement". A loss of half point occurred.

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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 |
| | 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, these items are listed in PR DTOPW Pipeline Safety Administrative Procedures under Sub-title, Accident Investigation page 11. Improvement is needed to enhance the written procedures to list contact names and telephone numbers of individuals to call when reporting an incident.

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

Evaluator Notes:

A loss of one point occurred in Question B.3

Total points scored for this section: 14
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 | 4 |
| | <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:

- a. A review of TQ Blackboard data found no one has completed the OQ training. This training will need to be completed before conducting the scheduled OQ inspections in CY2020.
- b. DIMP/TIMP training courses have not been completed in accordance to Blackboard data.
- c. PR does not have an LNG facility therefore this is an N/A.
- d. A review of TQ Blackboard found neither inspector/program manager have taken, requested or waitlisted the Root Cause Analysis Course. This item was listed in last year's program evaluation Part C-Program Performance, Question 2 (c): as "Needs Improvement". Therefore, a one point deduction was given.
- e. No outside training has been completed.
- f. A review of TQ Blackboard data confirm program manager and inspector have completed all gas inspector courses to lead a standard inspection.

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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 | 5 |
|---|--|---|---|

Evaluator Notes:

Yes, Alice Velazquez has completed all TQ courses and has over 10 years' experience in pipeline safety regulations. She is currently the NAPSRS Southern Region Vice-Chairman.

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

Evaluator Notes:

A loss of one point occurred in this section of review on Question C.1

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 <ol 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) | 5 | 5 |
|----------|--|---|---|

Evaluator Notes:

Spreadsheet provided by Program Manager indicated seven operators under jurisdictional authority have had a standard inspection within the 5-year time intervals. It was noted the inspection program started in CY2016 when the PSC transferred the program to DTPW. A Public Awareness Effective (PAE) inspection was performed on San Juan Gas in CY2019. Six LPG systems are scheduled for PPA, Drug & Alcohol and OQ in CY2020. IMP/DIMP inspection is scheduled to be performed on Juan San Gas in CY2020. Control Room and LNG inspections are not applicable to the program.

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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 <ol 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) | 10 | 10 |
|----------|--|----|----|

Evaluator Notes:

Yes, PR DTPW uses the federal PHMSA Inspection form for all types of inspections. No LNG facilities in PR. The random selected operators for CY2019 were Empire Gas with five inspection units, Del Gas Corporation and Liquilux Gas Corporation with one inspection unit each. All information in the reports were completed and accurate with items reviewed and observed.

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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 |
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Evaluator Notes:

Yes, verification of QO program is reviewed during the standard inspection.

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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 <ol style="list-style-type: none">a. Are the state's largest operator(s) plans being reviewed annually? | 2 | 2 |
|----------|---|---|---|

- 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:

- a. Ecoelectric has provided information on their integrity management program to the program manager. The manager has made recommendations about the plan under a separate communication.
- b & c This is checked and reviewed during the standard inspection audit.

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:

- a & b. PR does not have cast iron pipelines in their state.
- c thru g. This is accomplished and reviewed during the standard inspection audit.

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
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Evaluator Notes:

Only advisory bulletins that are relative to LPG systems are provided to the operators via State Program Manager letters and presentations. All relative advisory documents are reviewed with the operator during the inspection audit.

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:

- a, b & c. A review of compliance letters sent to Empire Gas Company, Del Gas Corporation, Light Gas Corporation, Liquilux Gas Corporation, San Juan Gas Acquisition Corporation and Tropigas of Puerto Rico found them addressed to President or Executive officer of the companies. All violations were well documented with finding of facts and areas of concern.
- d. Program manager and inspector routinely review the status of each compliance letter weekly and prior to scheduling other inspections. A follow-up review is conducted on a 30-day cycle. Although this process is administratively performed, improvement is needed in documenting this information in the procedures manual.
- e. Yes, six compliance actions were issued in CY2019.
- f. They have considered but not demonstrated levying a fine. The program is less than 5 years old.
- g. Yes, a review of compliance letters sent to Empire Gas Company, Del Gas Corporation, Light Gas Corporation, Liquilux Gas Corporation, San Juan Gas Acquisition Corporation and Tropigas of Puerto Rico found each letter was signed by the Program Manager with information relative to civil fines for non-compliance.
- h. Yes, the agency has the authority to issue a show cause order under state law.
- i. Yes, letters are mailed and an exit interview is conducted with the operator at the end of the inspection day.
- j. Yes. A review of compliance letters confirms the operator is notified of findings within 90 days after the inspection date.

8	(Incident Investigations) Were all incidents investigated, thoroughly documented, with conclusions and recommendations?	10	10
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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, this is accomplished by correspondence between the program manager and operators. Contact information is provided in letters to operator and presented at damage prevention seminars.

No incidents/accidents occurred during CY2019.

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
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, Secretary Carlos M. Contreras response letter to Zach Barrett was received on August 19, 2019 and within the required 60 days' time schedule.

- 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:

PR DTOPW conducted a pipeline safety training seminar on June 25-26, 2019 in San Juan.

- 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:

Yes, this item was reviewed with San Juan Gas during the standard inspection audit.

- 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:

Information about the pipeline safety program and inspection performed had previously been developed to be posted on PR DTOPW website but IT department has not completed this work. This item was listed in last year's evaluation review Part C- Program Performance, Question D.19, as Needs Improvement. Improvement again is needed.

- 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:

Reviewed Pipeline Data Mart and found no safety related condition reports for CY2019.

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

Evaluator Notes:

- a. Program manager has responded to more than 90% of all NAPSR Surveys.
b. No operator IM notification were provided in CY2019.
c. Yes, currently Ecoelectric notification report has been completed but not closed. Program Manager will check on this item.

- 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 waivers/special permits have been issued in CY2019 and prior years.

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

Evaluator Notes:

File folders were accessible and organized during the CY2018 evaluation review. In discussion with program manager filing system has not changed.

- 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:

Program Manager is aware and familiar with the program but needs additional assistance from Rex Evans. Program Manager will request assistance in CY2020.

- 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:

Reviewed state program performance metrics in Pipeline Data Mart. Program Manager is familiar with data. It was noted no leaks or hazardous leaks have been reported in the last two years.

- 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, this item was presented at the recently conducted TQ Pipeline Safety Seminar in June 25-26, 2019. Omar Molina was the presenter. He gave a remote presentation with a question and answer period with audience engagement

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

Evaluator Notes:

Loss of half a point occurred in Question D.12.

Total points scored for this section: 50
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:

- & b. On October 10, 2020, Glynn Blanton, PHMSA State Programs, observed via FaceTime Ms. Zuleika Ruiz Hernandez conducting a standard inspection on Empresas de Gas at Aguadilla Mall in Aguadilla, PR The last inspection performed on this operator was April 20, 2020.
- Yes, Mr. Javier Torres & Mr. Terry Arenas, Technicians were present at the site. Mr. Orlando Maldonado, Manager, was on the phone with the inspector.
- Ms. Zuleika Ruiz Hernandez is the only inspector with PR DTOPW.

- 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 standard inspection form was used to record information observed and provided by the operator.

- 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:

- Yes, several questions were asked to the operator pertaining to meters, pressure gauges, regulators, atmospheric corrosion, pipeline patrolling and maintenance records.
- Yes, detailed questions were asked about records and maintenance service.
- Safety issues were following in reviewing the pipeline from the tank to the individual meters in each space.
- & e. Yes, the inspection was adequately performed to insure compliance with the pipeline safety regulations.

- 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, Zuleika Ruiz Hernandez has several years of experience in pipeline safety and completed all courses at TQ.

- 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, an exit interview was conducted with Mr. Orlando Maldonado pertaining to three potential violations found. The violations pertain to locking meters, telephone cables on existing pipelines and atmospheric corrosion on the pipeline.

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, a safe and positive inspection was performed on the operator. The inspection consisted of a review of the LPG tank, regulator, pressure gauges and condition of the tank's enclosed area. A review of the pipeline from the tank to each of the eleven meters including the main line across the roof of the complex was performed. In accordance to COVID-19 best practices, the inspector and technicians were wearing mask and observed maintaining a safe distance between each individual.

7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section of the review.

The inspector conducted herself in a professional and experienced manner.

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:

San Juan Gas annual report is reviewed by the Program Manager and Inspector annually. The information is used in determining compliance with damage prevention, risk rating inspection visits and leakage.

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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, meetings have been held with companies on this issue to resolve damages that are occurring on their facilities. PR has a strong damage prevention program.

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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:

Yes, Program Manager and inspector monitor the annual report submitted by San Juan Gas. Information is discussed with the operator during inspection audit.

Program Manager is also responsibility for monitoring the state's damage prevention program and has evaluated the root causes of damages to all underground facilities.

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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 <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. | 2 | 2 |
|---|--|---|---|

- d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?

Evaluator Notes:

- a. A review of information filed with the agency has determined contractors are causing the highest number of damages.
b & c. Operators are having damage prevention meetings with contractors to provide information on callings, locating and hand digging.
d. The root cause of damages in Puerto Rico is due to improper marking and depth of line.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section of the review.

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:

PR DTPW is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

PR DTPW is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

PR DTPW is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

PR DTPW is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

PR DTPW is not an interstate agent and does not have a 60106 agreement with PHMSA.

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

Evaluator Notes:

PR DTPW is not an interstate agent and does not have a 60106 agreement with PHMSA.

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