



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

1200 New Jersey Avenue SE
Washington DC 20590

2020 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



2020 Gas State Program Evaluation -- CY 2020

Gas

State Agency: Florida

Agency Status:

Date of Visit: 03/15/2021 - 03/30/2021

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 2020 (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

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

Possible Points Points Scored

0 0
15 15
10 10
50 50
15 15
10 10
0 0

TOTALS

100 100

State Rating 100.0

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- 1 Were the following Progress Report Items accurate? (*items not scored on progress report) 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. Information is accurate in Attachment 1 of Progress Report.
- b. Information is accurate in Attachment 2 of Progress Report.
- c. Information is accurate in Attachment 3 of Progress Report.
- d. Information is accurate in Attachment 4 of Progress Report with the exception, Incident in Bradenton possible error with the cost of \$128,973 in PDM.
- e. Information is accurate in Attachment 1 of Progress Report.
- f. Information is accurate in Attachment 1 of Progress Report.
- g. Information is accurate in Attachment 1 of Progress Report.
- h. Information is accurate in Attachment 1 of Progress Report.
- i. Information is accurate in Attachment 1 of Progress Report.

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 procedures are included in the Division of Engineering SOP 1111, pages 27 ? 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. The procedures are included in the Division of 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. The procedures are included in the Division of 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. The FLPSC mechanism to receive, record, and respond to operator incidents is included in the SOP 1010 on page 8.
There is a procedure for when an onsite investigation was not made, to obtain sufficient information in SOP 1122 page 49

5 General Comments:

Info Only = No Points

Info Only Info Only

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:

All the FLPSC have completed the Core Courses at TQ. There are many inspectors that have completed the OQ, DIMP/IMP, and one inspector has completed the Root Cause Training.

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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. The State Pipeline Safety Program Manager indicated adequate knowledge of PHMSA program and regulations.

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

Evaluator Notes:

There were no issues identified in Part C of the evaluation.

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



PART D - Program Performance

Points(MAX) Score

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|---|---|---|---|
| 1 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <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:

Yes. Reviewed the following data - Standard Inspections: (1) Reedy Creek Utility Co. Inc. (2019, 2020), Fort Pierce Utilities Auth. (2019, 2020), City of Jasper (2019, 2020), Clearwater Gas System (2019, 2020), City of Tallahassee (2019 & 2020), City of Leesburg (2019, 2020), Peoples Gas System Inc.(2019, 2020), Okaloosa County Gas District (2019, 2020), Kissimmee Utility Authority (2019, 2020), Argos Cement (2019, 2020), City of Lakeland (2019, 2020), Seacoast Gas Transmission LLC (2019, 2020), Area Housing Commission Pensacola (2019, 2020), Ft. Walton Beach H/A (2019, 2020), Gainesville H/A (2019, 2020), Universal Orlando (2019, 2020); Public Awareness: Reedy Creek Utility Co. Inc. (2019, 2020), Fort Pierce Utilities Auth. (2019, 2020), City of Jasper (2019, 2020), Clearwater Gas System (2019, 2020), City of Tallahassee (2019 & 2020), City of Leesburg (2019, 2020), Peoples Gas System Inc.(2019, 2020), Okaloosa County Gas District (2019, 2020), Kissimmee Utility Authority (2019, 2020), Argos Cement (2019, 2020), City of Lakeland (2019, 2020), Seacoast Gas Transmission LLC (2019, 2020) ; Drug and Alcohol: Reedy Creek Utility Co. Inc. (2019), Fort Pierce Utilities Auth. (2019), City of Jasper (2019), Clearwater Gas System (2019), City of Tallahassee (2019), City of Leesburg (2019), Peoples Gas System Inc.(2019), Okaloosa County Gas District (2019), Kissimmee Utility Authority (2019), Argos Cement (2019), City of Lakeland (2019), Seacoast Gas Transmission LLC (2019) ; OQ Inspections: Reedy Creek Utility Co. Inc. (2019, 2020), Fort Pierce Utilities Auth. (2019, 2020), City of Jasper (2019, 2020), Clearwater Gas System (2019, 2020), City of Tallahassee (2019 & 2020), City of Leesburg (2019, 2020), Peoples Gas System Inc.(2019, 2020), Okaloosa County Gas District (2019, 2020), Kissimmee Utility Authority (2019, 2020), Argos Cement (2019, 2020), City of Lakeland (2019, 2020), Seacoast Gas Transmission LLC (2019, 2020), Area Housing Commission Pensacola (2019, 2020), Ft. Walton Beach H/A (2019, 2020), Gainesville H/A (2019, 2020), Universal Orlando (2019, 2020); DIMP: Reedy Creek Utility Co. Inc. (2019, 2020), Fort Pierce Utilities Auth. (2019, 2020), City of Jasper (2019, 2020), Clearwater Gas System (2019, 2020), City of Tallahassee (2019 & 2020), City of Leesburg (2019, 2020), Peoples Gas System Inc.(2019, 2020), Okaloosa County Gas District (2019, 2020), Kissimmee Utility Authority (2019, 2020), Area Housing Commission Pensacola (2019, 2020), Ft. Walton Beach H/A (2019, 2020), Gainesville H/A (2019, 2020), Universal Orlando (2019, 2020); and IM Inspections: Kissimmee Utility Authority (2017), Argos Cement (2020), City of Lakeland (2016), Seacoast Gas Transmission LLC (2019).

*Note: FLPSC had performed 23.68% construction inspections in CY2020.

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| 2 | Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1. Do inspection records indicate that adequate reviews of procedures, records and field activities, including notes and the appropriate level of inspection person-days for each inspection, were performed?
Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
| | <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 the following inspection reports: (1) Reedy Creek Utility Co. Inc. (2020), (2) Ft. Pierce Utilities Auth. (2020), (3) City of Jasper (2020), (4) Clearwater Gas System (2020), (5) City of Tallahassee (2020), (4) City of Leesburg (2020), (5) Peoples Gas Inc. (2020), (6) Okaloosa County Gas District (2020), (7) Kissimmee Utility Authority (2020), (8) Argos Cement (2020), (9) City of Lakeland (2020), (10) Seacoast Gas Transmission (2020), (11) Area Housing Commission of Pensacola (2020), (12) Ft. Walton Beach H/A (2020), (13) Gainesville H/A (2020), and (14) Universal Orlando (2020).

The inspection forms covered all applicable code requirements addressed on Federal Inspection forms. FLPSC completed all applicable portions of inspection forms.

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| 3 | Is state verifying monitoring (Protocol 9/Form15) of operators OQ programs? 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 OQ inspection reports for Reedy Creek Utility Co. Inc. (2020), Fort Pierce Utilities Auth. (2020), City of Jasper (2020), Clearwater Gas System (2020), City of Tallahassee (2020), City of Leesburg (2020), Peoples Gas System Inc. (2020), Okaloosa County Gas District (2020), Kissimmee Utility Authority (2020), Argos Cement (2020), City of Lakeland (2020), Seacoast Gas Transmission LLC (2020), Area Housing Commission Pensacola (2020), Ft. Walton Beach H/A (2020), Gainesville H/A (2020), and Universal Orlando (2020) which verified plans were updated and that persons performing covered tasks were properly qualified.
No issues found.

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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
a. Are the state's largest operator(s) plans being reviewed annually to ensure they are completing the full cycle of the DIMP/IMP process?
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? | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Reviewed DIMP inspection reports for Reedy Creek Utility Co. Inc. (2020), Fort Pierce Utilities Auth. (2020), City of Jasper (2020), Clearwater Gas System (2020), City of Tallahassee (2020), City of Leesburg (2020), Peoples Gas System Inc. (2020), Okaloosa County Gas District (2020), Kissimmee Utility Authority (2020), Argos Cement (2020), City of Lakeland (2020), Seacoast Gas Transmission LLC (2020), Area Housing Commission Pensacola (2020), Ft. Walton Beach H/A (2020), Gainesville H/A (2020), and Universal Orlando (2020) which included a review of plans, along with monitoring progress.

Reviewed IM inspection reports for Argos Cement (2020). 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
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); | 2 | 2 |
|---|--|---|---|

- 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 -5.
- 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 and DIMP Implementation Form page 4 of 31.
- 5g. The question is included in the GS-5 Pressure Regulation from page 7.

Note: The FLPSC emailed each operator a link to the NTSB recommendations on January 13, 2021.

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:

The FLPSC emailed a link to the ADBs to all operators on January 13, 2021.

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	10	10
	Yes = 10 No = 0 Needs Improvement = 1-9		
	<ul style="list-style-type: none"> a. Were compliance actions sent to company officer or manager/board member if municipal/government system? b. Were probable violations documented properly? c. Resolve probable violations d. Routinely review progress of probable violations e. Did state issue compliance actions for all probable violations discovered? f. Can state demonstrate fining authority for pipeline safety violations? g. Does Program Manager review, approve and monitor all compliance actions? (note: Program Manager or Senior Official should sign any NOPV or related enforcement action) h. Did state compliance actions give reasonable due process to all parties? Including "show cause" hearing, if necessary. i. Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns j. Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. (Incident investigations do not need to meet 30/90-day requirement) 		

Evaluator Notes:

Reviewed the following inspection report for Clearwater Gas System (2020) for which the FLPSC followed compliance procedures from discovery to resolution, and adequately documented all probable violations, including resolution. From the random selected list of operators, this was the only inspection with a compliance action in CY2020.

- 8** (Incident Investigations) Were all federally reportable 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:

The FLPSC performed on-site investigation all incidents recorded in Attachment 4 of 2020 Gas Base Grant Progress Report. They were thoroughly documented, with conclusions and recommendations. There were no compliance actions found during the investigations. The FLPSC did provide assistance to AID by providing additional information on a Gas Distribution and Transmission pipeline incident. FLPSC shares lessons learned during the NAPSR 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:

Chair letter sent on July 30, 2020, response received on August 20, 2020.

- 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. They are planning to have pipeline seminar in 2021, either virtually or in person.

- 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.

- 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. The public can request any document from the pipeline safety office, if not considered confidential. The request is submitted to the Clerk's office, then the information is reviewed by legal staff before being sent to the public.

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

Evaluator Notes:

FLPSC has no open SRCRs at the time of the evaluation. This was verified through the PDM.

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

Evaluator Notes:

Yes. The FLPSC responded to survey requests from NAPSRS and PHMSA. FLPSC did request the assistance of Blaine Keener with WMS.

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

Evaluator Notes:

FLPSC has no active waiver /special permits at the time of the evaluation.

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

Evaluator Notes:

Yes. Files were well-organized and accessible.

- 17** Discussion with State on accuracy of inspection day information submitted into State 3 3
Inspection Day Calculation Tool (SICT). Has the state updated SICT data?
Yes = 3 No = 0 Needs Improvement = 1-2

Evaluator Notes:

Discussed with the FLPSC about the accuracy of inspection day information and found there were no issues with data submitted in the SICT.

- 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:

The data for the State Program Performance Metrics was from 2019, and the FLPSC had not received all the annual reports for 2020 at the time of evaluation. This data will be analyzed later to identify any trends.

- 19** Did the state encourage and promote operator implementation of Pipeline Safety 1 1
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 = No Points
a. <https://pipelinesms.org/>
b. Reference AGA recommendation to members May 20, 2019

Evaluator Notes:

Due to limited meetings with large operators in 2020 due to the COVID-19, FLPSC was not able to encourage and promote implementation of Pipeline Safety Management Systems (PSMS). PSMS will be included as a topic in the next pipeline safety seminar.

20 General Comments:

Info Only = No Points

Info Only Info Only

Evaluator Notes:

There were no issues identified in Part D of the evaluation.

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:

Operator: TECO Peoples Gas

Inspector(s): Bradley Kissel (L) and Carlos Andino

Location: Daytona Beach, FL

Date: March 16-18, 2021

PHMSA Rep: Clint Stephens

The FLPSC performed a comprehensive standard field inspection. This unit was last inspected in 2018. The pipeline operator was present during the inspection. Mr. Kissel has been with the FLPSC program for 2.5 years

- 2 Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) 2 2
- Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. The inspector used forms GS-04 - Corrosion Control, GS-05 - Gas Pressure and Over-Pressure Protection Evaluation, and GS-06 - Odorization Evaluation. The form was used as a guide for the inspection.

- 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 ensured procedures were followed during the observation of atmospheric corrosion control, regulator station testing (opp), pipeline marker signs, operation of valves, calibration of odorometer and multimeters, rectifier readings, cathodic protection surveys, and exposed main conditions. The State inspector stated he reviewed OQ records for pipeline personnel performing covered tasks prior to the field inspection. The inspection was of adequate length to properly perform the inspection.

- 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:

From my observation, the inspector had adequate knowledge of the pipeline safety program and regulations. The inspector was able to communicate regulatory and other items of concern during the inspection.

- 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:

The inspector had not completed the inspection, so an exit interview was not performed at the end of the field evaluation. However; any safety issue was communicated to the pipeline operator at the time of discovery.

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:

The inspection was performed in a safe, positive, and constructive manner. The inspector observed atmospheric corrosion control, regulator station testing (opp), pipeline marker signs, operation of valves, calibration of odorometer and multimeters, rectifier readings, cathodic protection surveys, and exposed main conditions in the field.

7 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues identified in Part E of the evaluation.

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



PART F - Damage prevention and Annual report analysis**Points(MAX) Score**

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

Evaluator Notes:

At the time of the evaluation the FLPSC had not reviewed the operator annual reports for 2020; however, the reports for 2019 were reviewed for accuracy and analyzed for trends. 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 | 2 |
|---|--|---|---|

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, and as a topic during the pipeline safety seminar. The FPSC held a workshop with Florida One-Call on February 3, 2020 discussed with its larger operators the causes for excavation damage.

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

Evaluator Notes:

The FPSC held a workshop with Florida One-Call on 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 during the pipeline safety seminar tentatively scheduled for 2021.

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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? | 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. However; the FLPSC has not collected all the data from the annual reports for 2020 to evaluate trends on the number of pipeline damages per 1,000 locate requests at the time of the evaluation.

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: 10
Total possible points for this section: 10



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:

FLPSC is not an interstate agent.

- 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:

FLPSC is not an interstate agent.

- 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:

FLPSC is not an interstate agent.

- 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:

FLPSC is not an interstate agent.

- 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:

FLPSC is not an interstate agent.

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

Evaluator Notes:

FLPSC is not an interstate agent.

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