

**PHMSA UNDERGROUND NATURAL GAS STORAGE (UNGS)  
PA PUC PROGRAM EVALUATION – CY2020  
CONDUCTED 7/12-16/2021**

<b>A – PROGRESS REPORT AND PROGRAM DOCUMENTATION REVIEW</b>	<b>9 of 9</b>
<b>B – PROGRAM INSPECTION PROCEDURES</b>	<b>13 of 14</b>
<b>C – PROGRAM PERFORMANCE</b>	<b>32 of 32 (34)</b>
<b>D – COMPLIANCE ACTIVITIES</b>	<b>19 of 19 (21)</b>
<b>E – INCIDENT INVESTIGATIONS</b>	<b>5 of 5 (13)</b>
<b>F – DAMAGE PREVENTION</b>	<b>4 of 4</b>
<b>G – FIELD INSPECTIONS</b>	<b>12</b>
<b>H - 60106 AGREEMENT STATE (if applicable)</b>	<b>NA (6)</b>
<b>TOTAL PROGRAM EVALUATION POINTS</b>	<b>94 OF 95(113)</b>

## PHMSA UNGS STATE PROGRAM EVALUATION – CY2020

A – PROGRESS REPORT AND PROGRAM DOCUMENTATION REVIEW THIS SECTION ANALYZES ACCURACY AND COMPLETENESS OF ANNUAL PROGRESS REPORT		SCORE
1	Accuracy of Jurisdictional Authority and Operator/Inspection Units Data – Progress Report Attachment 1 (Yes= 1 point, No= 0 Points, NI=.5 point) <b>Comments: Yes, Attachment 1 agrees with Attachment 3, Attachment 8, and PA PUC internal records.</b>	1
2	Review of Inspection Days for accuracy – Progress Report Attachment 2 (Yes= 1 point, No= 0 Points, NI=.5 point) <b>Comments: Yes. Attachment 2 agrees with PA PUC internal records.</b>	1
3	Accuracy verification of Operators and Operators Inspection Units in State – Progress Report Attachment 3 (Yes= 1 point, No= 0 Points, NI=.5 point) <b>Comments: Yes. Attachment 3 agrees with PA PUC internal records.</b>	1
4	Accuracy verification of Compliance Activities – Progress Report Attachment 5 (Yes= 1 point, No= 0 Points, NI=.5 point) <b>Comments: Yes. Attachment 5 is consistent with PA internal records.</b>	1
5	Were UNGS program files well-organized and accessible? - Progress Report Attachment 6 (Yes= 2 points, No= 0 Points, NI=1 point) <b>Comments: Yes. Pertinent records are electronic and were reviewed.</b>	2
6	Was employee listing and completed training accurate and complete? – Progress Report Attachment 7 (Yes= 1 point, No= 0 Points, NI=.5 point) <b>Comments: Yes. Attachment 7 is consistent with PA internal records and PA training records were reviewed.</b>	1
7	Verification of Part 192 and 199 Rules and Amendments – Progress Report Attachment 8 (Yes= 1 point, No= 0 Points) <b>Comments: Yes. Attachment 8 is consistent with PA internal records, Commission Regulations, and PA Law. Title 52 PA - 59.33.B. Safety. Provides for automatic updates of revised Federal Regulations.</b>	1
8	List of Planned Performance - Did State describe accomplishments on Progress Report in detail – Progress Report Attachment 10 (Yes= 1 point, No= 0 Points, NI=.5 point) <b>Comments: Yes. Program achievements and plans are addressed in Attachment 10.</b>	1
9	<b>General Comments: Ms. Gladys M. Brown Dutrieuille, Chairman, Pennsylvania Public Utility Commission, PO Box 3265, Harrisburg, PA 17105-3265; Rob Horensky, Manager, Safety Division, Patrick Gaume, PHMSA. UNGS PROGRESS REPORT REVIEW score is 50 of 50: Highest percentage of inspectors is in categories I &amp; II. No incidents were reported in UNGS for 2018-2020. Part A scored 9 of 9 points.</b>	9

<b>B – PROGRAM INSPECTION PROCEDURES</b> Does State Inspection Plan include procedures that address the following elements? (See Guidelines Section 5.1)		
1	Does State have written inspection procedures? (Yes= 2 points, No= 0 Points, NI=1 point) <b>Comments: Yes. They were developed from, and added into, the NG Procedures.</b>	2
2	<p>Standard Inspections</p> <p>Do Standard Inspection procedures give guidance to State inspectors that insure consistency for inspections conducted by the State? The following elements should be addressed at a minimum. (Review of Procedures, Records, or Field Items to complete a PHMSA UNGS IA Question Set (RESERVOIR or CAVERN) – 2019.12.31)</p> <ul style="list-style-type: none"> <li>• Pre-Inspection Activities</li> <li>• Inspection Activities</li> </ul> <p>Post Inspection Activities (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes. Section 9.35.3 for Pre, 9.35.5 for Post, and 9.35.1, .2, &amp; .4 for inspection Activities</b></p>	2
3	<p>Integrity Management Inspections</p> <ul style="list-style-type: none"> <li>• Do Integrity Management Inspection procedures give guidance to State inspectors that insure consistency for inspections conducted by the State? The following elements should be addressed at a minimum. (Integrity Testing and Maintenance: Observing Integrity Testing (Tubing, Casing, Cement), reservoir integrity monitoring, &amp; FLIR Camera inspections.)</li> <li>• Pre-Inspection Activities</li> <li>• Inspection Activities</li> </ul> <p>Post Inspection Activities (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: NI 1 of 2 points. Section 9.35.3 for Pre, 9.35.5 for Post, and 9.35.1, .2, &amp; .4 for inspection Activities. We observed that more detail is needed to address various types of logging, pressure testing, and annulus monitoring for tubing, casings, and cement; also for reservoir modeling, and monitoring for leaking gas at the surface.</b></p>	1
4	<p>Design, Testing, and Construction Inspections</p> <p>Do Design, Testing, and Construction Inspection procedures give guidance to State inspectors that insure consistency for Inspections conducted by the State? The following elements should be addressed at a minimum. (Review of procedures, records, and field activities to complete PHMSA UNGS IA Question Set (RESERVOIR or CAVERN CONSTRUCTION) – 2019.12.31. Inspection activities for well design, drilling and completion activities, well workover, reservoir maintenance/repair activities, and abandonment (Plugging and cementing), temporary abandonment, and restoration.)</p> <ul style="list-style-type: none"> <li>• Pre-Inspection Activities</li> <li>• Inspection Activities</li> <li>• Post Inspection Activities</li> </ul> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)  <b>Comments: Yes. Section 9.35.3 for Pre, 9.35.5 for Post, and 9.35.1, .2, &amp; .4 for inspection Activities</b></p>	1

5	<p><b>Wellhead Inspections</b></p> <p>Do Wellhead Inspection procedures give guidance to State inspectors that insure consistency for Inspections conducted by the State? The following elements should be addressed at a minimum.</p> <ul style="list-style-type: none"> <li>• Pre-Inspection Activities</li> <li>• Inspection Activities</li> <li>• Post Inspection Activities</li> </ul> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. There are no special wellhead inspections in PA. Wellhead inspections are part of the Field Inspection portion of a Standard UNGS Inspection. Section 9.35.3 for Pre, 9.35.5 for Post, and 9.35.1, .2, &amp; .4 for inspection Activities.</b></p>	1
6	<p><b>Drug and Alcohol Inspections</b></p> <p>Do Drug and Alcohol Inspection procedures give guidance to State inspectors that insure consistency for Inspections conducted by the State? The following elements should be addressed at a minimum. (Using AI to complete the federal Comprehensive Drug and Alcohol program (Form 3.1.11). Includes time conducting joint inspections with other agencies for this type of inspection.)</p> <ul style="list-style-type: none"> <li>• Pre-Inspection Activities</li> <li>• Inspection Activities</li> <li>• Post Inspection Activities</li> </ul> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. Section 9.29. Also see Section 9.35.3 for Pre, 9.35.5 for Post, and 9.35.1, .2, &amp; .4 for inspection Activities.</b></p>	1
7	<p>Does inspection plan address inspection priorities of each inspection unit, based on the following elements?</p> <ul style="list-style-type: none"> <li>• <b>Length of time since last inspection (Within five-year interval per inspection unit)</b></li> <li>• <b>Operating history of operator/unit and/or location (includes leakage, incident, Integrity Testing, and compliance activities)</b></li> <li>• <b>Type of activity being undertaken by operators in inspection units (i.e. construction)</b></li> <li>• <b>Locations of operator's inspection units being inspected - (Geographic area, Population Density, etc.)</b></li> <li>• <b>Process to identify high-risk inspection units considering integrity threats</b></li> <li>• <b>Are inspection units broken down appropriately?</b></li> </ul> <p>(Yes= 5 points, No= 0 Points, NI=1-4 points)</p> <p><b>Comments: Yes. See 'Procedures for determining inspection priorities'.</b></p>	5
8	<p><b>General Comments: Part B scored 13 of 14 points. Question #3 is NI.</b></p>	13

C – PROGRAM PERFORMANCE		
1	<p>Was ratio of Total Inspection Person-Days to Total Person-Days acceptable? (Chapter 4.2)</p> <p><b>A = Total Inspection Person Days (Attachment 2)</b>  <b>B = Total Inspection Person Days Charged to the program</b>  <b>(220 x Number of Inspection person years from Attachment 7)</b>  <b>Ratio = A/B      If Ratio &gt;= .38 then score = 5 points. If Ratio &lt; .38 then score = 0 points.</b>          (Yes= 5 points, No= 0 Points)  <b>Comments: Yes. 44 program days, 27 inspection days=0.61, .61&gt;.38 okay.</b></p>	5
2	<p>Has each Inspector and Program Manager fulfilled the TQ Training Requirements? (See Guidelines Appendix C for requirements and Chapter 4.3.1)          (Yes= 5 points, No= 0 Points, NI=1-4)  <b>Comments: Yes, three of four inspectors are TQ qualified and the rest are within the 3 years of the program time span.</b></p>	5
3	<p>Does State use the PHMSA Inspection Assistant (IA) program to document inspections? (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes. 2020 &amp; 2021 inspections were performed in IA.</b></p>	2
4	<p>Did records and discussions with Program Manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1          (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes. Rob &amp; his staff are well aware of PHMSA Program and regulations.</b></p>	2
5	<p>Did State respond to PHMSA's Evaluation Letter within 60 days and correct or address any noted deficiencies? Chapter 8.1          (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes, was less than 30 days, Nov 11<sup>th</sup> to Dec 9<sup>th</sup>.</b></p>	2
6	<p>Did State inspect all types of operators and inspection units in accordance with time intervals established in their written procedures? Chapter 5.1          (Yes= 5 points, No= 0 Points, NI=1-4 points)  <b>Comments: Yes. All inspections are being addressed within the 3 year interval in accordance with PA PUC procedures.</b></p>	5
7	<p>Did State Inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Chapter 5.1          (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes, IA is being used and the appropriate modules are uploaded into the inspection.</b></p>	2
8	<p>Did State complete all applicable portions of inspection forms?          (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes, they are complete.</b></p>	2
9	<p>Has the State reviewed Operator Annual reports, along with Incident reports, for accuracy and analyzed data for trends and operator issues?          (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes, the spreadsheet that provides a comparative study of year to year annual reports was presented and its effectiveness was demonstrated.</b></p>	2

10	<p>Is the State verifying operators are conducting drug and alcohol tests required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199</p> <p>(Yes= 2 points, No= 0 Points, NI= 1 point)</p> <p><b>Comments: Yes. D&amp;A are addressed during HQ Inspections and they are applicable to UNGS. We discussed that UNGS applicable D&amp;A inspections will be conducted using IA Starting in 2021.</b></p>	2
11	<p>Does the State have a mechanism for communicating with stakeholders regarding the inspection and enforcement program? (This should include making enforcement cases available to public).</p> <p>(Yes= 1 points, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. PA sponsors a Pipeline Safety Seminar every year and shares enforcement cases at that time. Info is also available on the website. Forward Advisory notices to operators via emails.</b></p>	1
12	<p>Did State execute appropriate follow-up actions to Safety Related Condition Reports (SRCR)? Chapter 6.3</p> <p>(Yes= 1 points, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. the first SRC was reported in 2020 in the history of the PA UNGS Partnership. It was monitored and closed according to procedures and IA was used.</b></p>	1
13	<p>Did the State participate in/respond to surveys or information requests from PHMSA?</p> <p>(Yes= 1 points, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. PA participates and responds to both PHMSA &amp; NAPSRS.</b></p>	1
14	<p>Did the State forward any potential waivers/special permits to PHMSA for review prior to issuing them to operators?</p> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. none for UNGS.</b></p>	NA
15	<p>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.</p> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. none for UNGS.</b></p>	NA
16	<p><b>General Comments: Part C scored 32 of 32 points. Questions #14 &amp; 15 were NA.</b></p>	32

D – COMPLIANCE ACTIVITIES		
1	<p>Does the State have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1</p> <ul style="list-style-type: none"> <li>• <b>Procedures to notify an operator (company officer) when a noncompliance is identified (60105 States)</b></li> <li>• <b>Procedures to routinely review progress of compliance actions to prevent delays or breakdowns</b></li> <li>• <b>Procedures regarding closing outstanding probable violations</b></li> </ul> <p>(Yes= 4 points, No= 0 Points, NI=1-3 points)  <b>Comments: Yes. See Sections 7.3, 7.4 paragraph 3, 9.3.2, &amp; 10.2.</b></p>	4
2	<p>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</p> <ul style="list-style-type: none"> <li>• Were compliance actions sent to company officer or manager/board member if municipal/government system (60105 States)?</li> <li>• Document probable violations</li> <li>• Resolve probable violations</li> <li>• Routinely review progress of probable violations</li> </ul> <p>(Yes= 4 points, No= 0 Points, NI=1-3 points)  <b>Comments: Yes. It is in the procedures. Procedures were followed for the violation in 2020.</b></p>	4
3	<p>Did State within 30 days of the end of an inspection conduct a post-inspection briefing with the owner or operator of the UNGS facility inspected outlining any concerns identified during the inspection?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes. the exit interviews occurred at the end of the Procedures and records review in August, then again at the end of the field review in Sept.</b></p>	2
4	<p>Did State within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes. And informal notice was provided on Dec 3<sup>rd</sup> and the formal letter was sent on Dec 24<sup>th</sup>.</b></p>	2
5	<p>Did the State issue compliance actions for all probable violations discovered (60105 States)?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes. The single 'unsat' was addressed in the letter.</b></p>	2
6	<p>Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary (60105 States).</p> <p>(Yes= 2 points, No= 0 Points)  <b>Comments: Yes. Due process was followed with the operator.</b></p>	2

7	<p>Is the Program Manager familiar with State process for imposing civil penalties (60105 States)? (describe any actions taken)</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: Yes. The Program Manager is familiar with the State process and Empire was fined \$30K in 2021 due to a gas pipeline violation.</b></p>	2
8	<p>Were civil penalties considered for repeat violations, violations which can't be corrected by other means, or violations resulting in incidents (60105 States)? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: NA. no UNGS violations have been assessed.</b></p>	NA
9	<p>Can the State demonstrate it is using their enforcement fining authority for safety violations (60105 States)? (Yes= 1 point, No= 0 Points, NI= .5 point)</p> <p><b>Comments: Yes. The Program Manager is familiar with the State process and Empire was fined \$30K in 2021 due to a gas pipeline violation.</b></p>	1
10	<p><b>General Comments: Part D scored 19 of 19 points. Question 8 was NA.</b></p>	19



E – INCIDENT INVESTIGATIONS		
1	<p>Does the State have written procedures to address State actions in the event of an incident? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: Yes. See UNGS Procedures, Section 12.</b></p>	2
2	<p>Does State have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: Yes. See UNGS Procedures, Section 12.</b></p>	2
3	<p>Did the State keep adequate records of Incident notifications received? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: NA. no incidents in UNGS.</b></p>	NA
4	<p>If onsite investigation was not made, did State obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 (Yes= 1 point, No= 0 Points, NI= .5 point)</p> <p><b>Comments: NA. no incidents in UNGS. Procedures are in place. Normal practice is to respond on-site for significant and other incidents.</b></p>	NA
5	<p>Were all incidents investigated, thoroughly documented, and with conclusions and recommendations?</p> <ul style="list-style-type: none"> <li>• <b>Observations and document review</b></li> <li>• <b>Contributing Factors</b></li> <li>• <b>Recommendations to prevent recurrences where appropriate</b></li> </ul> <p>(Yes= 3 points, No= 0 Points, NI=1-2 points)</p> <p><b>Comments: NA. no incidents in UNGS. Procedures are in place to investigate.</b></p>	NA
6	<p>Did the State initiate compliance action for violations found during any incident investigation? (60106 States forward violations to PHMSA) (Yes= 1 point, No= 0 Points)</p> <p><b>Comments: NA. none. Procedures are in place.</b></p>	NA
7	<p>Did the State assist the 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? (validate report data from operators concerning incidents and investigate discrepancies) Chapter 6 (Yes= 1 point, No= 0 Points, NI= .5 point)</p> <p><b>Comments: NA. none. PA is completely willing to do so.</b></p>	NA
8	<p>Does State share lessons learned from incidents with PHMSA? (Yes= 1 point, No= 0 Points)</p> <p><b>Comments: Yes. Process is in place to share during Eastern Region NAPS Meetings.</b></p>	1

9	General Comments: Part E scored 5 of 5 points. Questions 3-7 were NA.	5
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F – DAMAGE PREVENTION		
1	<p>Did the State inspector verify UNGS operators are following their written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? (API 1171 Section 11.10 Public Awareness and Damage Prevention) (Yes= 2 points, No= 0 Points, NI=1 Point)</p> <p><b>Comments: Yes, procedures are in place, no UNGS excavation work has occurred.</b></p>	2
2	<p>Did the State encourage and promote practices for reducing damages to all underground facilities to its regulated companies? (Common Ground Alliance Best Practices, support excavation damage prevention legislation, etc.) (Yes= 2 points, No= 0 Points, NI=1 Point)</p> <p><b>Comments: Yes. PUC supports Paradigm, promotion of 811, has active enforcement, and other outreach forums.</b></p>	2
3	<p><b>General Comments: Part F scored 4 of 4 points.</b></p>	4

G – FIELD INSPECTIONS		
1	Operator, Inspector, Location, Date and PHMSA Representative <b>Comments: Peoples Natural Gas Company, LLC &amp; Peoples Gas Company, opid 15350 &amp;15476; Israel Gray - FUVE 2; Peoples office in Pittsburgh, 7/14-15/2021, Patrick Gaume. Other PA PUC attending: Rob Horensky, David Kline, Matthew Matse.</b>	
2	Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? (Yes= 1 point, No= 0 Points) <b>Comments: Yes. 10 participated in the virtual meeting, 5 with Peoples, 4 with PA PUC, &amp; 1 with PHMSA.</b>	1
3	Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (Yes= 2 points, No= 0 Points, NI=1 Point) <b>Comments: Yes. IA was used. See '2021 Peoples LLC UNGS Inspection'; Christopher Whiteash is Lead to complete the IA Form, Israel Gray is Lead for the Inspection.</b>	2
4	Did the inspector thoroughly document results of the inspection? (Yes= 2 points, No= 0 Points, NI=1 Point) <b>Comments: Yes. This inspection will address Procedures, Records, Records. A portion of the Procedures and Records were evaluated.</b>	2
5	Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Yes= 1 point, No= 0 Points) <b>Comments: Yes, Office and electronic resources were available for this Office phase of the inspection.</b>	1
6	Did the inspector adequately review the following during the field portion of the State Program Evaluation? <ul style="list-style-type: none"> <li>• Procedures</li> <li>• Records</li> <li>• Field Activities/Facilities</li> <li>• Other (please comment)</li> </ul> (Yes= 2 points, No= 0 Points, NI=1 Point) <b>Comments: Yes, the questions were addressed in an orderly manner. The inspection will be complete when it is finalized.</b>	2
7	Did the inspector have adequate knowledge of the UNGS safety program and regulations? (Evaluator will document reasons if unacceptable) (Yes= 2 points, No= 0 Points, NI=1 Point) <b>Comments: Yes. Israel and the inspection team demonstrated professional knowledge of the regulations.</b>	2
8	Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) (Yes= 1 point, No= 0 Points) <b>Comments: Yes, for an interim end-of-day review. No violations found to this point.</b>	1

[illegible]

H - 60106 AGREEMENT STATE (if applicable)		
1	<p>Did the State use the current federal inspection form(s)? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. H1-7 not a 60106 Agreement Program.</b></p>	NA
2	<p>Are results documented demonstrating inspection units were reviewed in accordance with State inspection plan? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. H1-7 not a 60106 Agreement Program.</b></p>	NA
3	<p>Were all probable violations identified by State referred to PHMSA for compliance action? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. H1-7 not a 60106 Agreement Program.</b></p>	NA
4	<p>Did the State immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. H1-7 not a 60106 Agreement Program.</b></p>	NA
5	<p>Did the State give written notice to PHMSA within 60 days of all probable violations found? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. H1-7 not a 60106 Agreement Program.</b></p>	NA
6	<p>Did the State initially submit adequate documentation to support compliance action by PHMSA on probable violations? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. H1-7 not a 60106 Agreement Program.</b></p>	NA
7	<p><b>General Comments: NA. H1-7 not a 60106 Agreement Program.</b></p>	NA