



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

1200 New Jersey Avenue SE  
Washington DC 20590

# 2021 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



# 2021 Gas State Program Evaluation -- CY 2021

Gas

**State Agency:** Puerto Rico

**Agency Status:**

**Date of Visit:** 10/31/2022 - 11/04/2022

**Agency Representative:** Zuleika Ruiz

**PHMSA Representative:** David Appelbaum

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

**Name/Title:** Eileen M. Velez Vega,, Secretary

**Agency:** Department of Transportation and Public Works

**Address:** Government Center, Roberto Sanchez Vilella, PO Box 41269

**City/State/Zip:** San Juan, PR 00940-1269

**Rating:**

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

## 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 2021 (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	0
15	15
10	8
50	49
15	15
10	10
0	0

### TOTALS

**100 97**

**State Rating** ..... **97.0**

## 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:

Program has done a good job reconciling Progress Report from last year. With regard to Attachment 1, the Program will need to continue to assess facilities that may be subject to their 60105 jurisdiction.

Since last year's evaluation, one transmission facility, New Fortress Energy, and at least two Master Meter facilities, have been identified. Also, a shopping complex, the "T-Mobile District," was found to have new LPG facilities that need to be brought into the PR DTOP's portfolio.

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<br>Yes = 5 No = 0 Needs Improvement = 1-4   | 5 | 5 |
|   | <ul style="list-style-type: none"><li>a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspections</li><li>b. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually)</li><li>c. OQ Inspections</li><li>d. Damage Prevention Inspections</li><li>e. On-Site Operator Training</li><li>f. Construction Inspections (annual efforts)</li><li>g. LNG Inspections</li></ul> |   |   |

**Evaluator Notes:**

Procedures meet minimum requirements. They still remain in draft form and need to be finalized before the next evaluation to avoid a loss of points.

- |   |   |   |   |
|---|---|---|---|
| 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<br>Yes = 4 No = 0 Needs Improvement = 1-3  | 4 | 4 |
|   | <ul style="list-style-type: none"><li>a. Length of time since last inspection</li><li>b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)</li><li>c. Type of activity being undertaken by operators (i.e. construction)</li><li>d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.)</li><li>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)</li><li>f. Are inspection units broken down appropriately?</li></ul> |   |   |

**Evaluator Notes:**

Yes, PR DTOPW Pipeline Safety Administrative Procedures address and list items "a thru e" on inspection priorities for each operator under "AMOUNT OF INPSECTIONS" on page 7.

Procedures meet minimum requirements. They still remain in draft form and need to be finalized before the next evaluation to avoid a loss of points.

- |   |   |   |   |
|---|---|---|---|
| 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<br>Yes = 3 No = 0 Needs Improvement = 1-2  | 3 | 3 |
|   | <ul style="list-style-type: none"><li>a. Procedures to notify an operator (company officer) when a noncompliance is identified</li><li>b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns</li><li>c. Procedures regarding closing outstanding probable violations</li></ul> |   |   |

**Evaluator Notes:**

Procedures could be made to be clearer on this, but otherwise appear to satisfy this question.

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

Evaluator Notes:

Procedures meet minimum requirements. They still remain in draft form and need to be finalized before the next evaluation to avoid a loss of points.

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**5** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Procedures meet minimum requirements. They still remain in draft form and need to be finalized before the next evaluation to avoid a loss of points.

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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 4.3<br>Yes = 5 No = 0 Needs Improvement = 1-4  | 5 | 4 |
|   | <ul style="list-style-type: none"><li>a. Completion of Required OQ Training before conducting inspection as lead</li><li>b. Completion of Required DIMP/IMP Training before conducting inspection as lead</li><li>c. Completion of Required LNG Training before conducting inspection as lead</li><li>d. Root Cause Training by at least one inspector/program manager</li><li>e. Note any outside training completed</li><li>f. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1)</li></ul> |   |   |

Evaluator Notes:

PM has all basic core classes for gas inspections. In CY 2021, the Program did not have an inspector who completed the IMP course (one point).

PM (inspector) will need to complete IMP and LNG this year to avoid losing more points next year.

- |   |  |   |   |
|---|--|---|---|
| 2 | Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations?<br>Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 4 |
|---|--|---|---|

Evaluator Notes:

Zuleika Ruiz has been the program manager since December 2021 and has attended the core TQ courses at Oklahoma City, OK. She has a sufficient understanding about the responsibilities and duties as a program manager but is new into the position and has room for improvement.

- |   |  |           |           |
|---|--|-----------|-----------|
| 3 | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

Total points scored for this section: 8  
Total possible points for this section: 10



## PART D - Program Performance

Points(MAX) Score

- |   |   |   |   |
|---|---|---|---|
| 1 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1<br>Yes = 5 No = 0 Needs Improvement = 1-4  | 5 | 5 |
|   | <ul style="list-style-type: none"><li>a. Standard (General Code Compliance)</li><li>b. Public Awareness Effectiveness Reviews</li><li>c. Drug and Alcohol</li><li>d. Control Room Management</li><li>e. Part 193 LNG Inspections</li><li>f. Construction (did state achieve 20% of total inspection person-days?)</li><li>g. OQ (see Question 3 for additional requirements)</li><li>h. IMP/DIMP (see Question 4 for additional requirements)</li></ul> |   |   |

**Evaluator Notes:**

All inspections identified in last year's evaluation have been completed or will be completed by the middle of December. Program is caught up with their interval requirements.

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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?<br>Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
|   | <ul style="list-style-type: none"><li>a. Standard (General Code Compliance)</li><li>b. Public Awareness Effectiveness Reviews</li><li>c. Drug and Alcohol</li><li>d. Control Room Management</li><li>e. Part 193 LNG Inspections</li><li>f. Construction</li><li>g. OQ (see Question 3 for additional requirements)</li><li>h. IMP/DIMP (see Question 4 for additional requirements)</li></ul>  |    |    |

**Evaluator Notes:**

Yes, PR DOTPW uses the federal PHMSA Inspection form for all types of inspections.

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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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

**Evaluator Notes:**

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

- |   |   |   |   |
|---|---|---|---|
| 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 Subparts O and P<br>Yes = 2 No = 0 Needs Improvement = 1  | 2 | 2 |
|   | <ul style="list-style-type: none"><li>a. Are the implementation plans of the state's large/largest operators(s) being reviewed annually to ensure they are completing full cycle of the IMP process?</li><li>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?</li><li>c. Are the states verifying operators are including low pressure distribution systems in their threat analysis?</li></ul> |   |   |

**Evaluator Notes:**

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.

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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<br>Yes = 2 No = 0 Needs Improvement = 1  | 2 | 2 |
|   | <ul style="list-style-type: none"><li>a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken;</li><li>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);</li><li>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;</li><li>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;</li><li>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;</li><li>f. Operator procedures for considering low pressure distribution systems in threat analysis?</li><li>g. Operator compliance with state and federal regulations for regulators located inside buildings?</li></ul> |   |   |

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.

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|---|--|---|---|
| 6 | Did the State verify Operators took appropriate action regarding advisory bulletins issued since the last evaluation? (Advisory Bulletins Current Year)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

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.

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- |   |   |    |    |
|---|---|----|----|
| 7 | (Compliance Activities) Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1<br>Yes = 10 No = 0 Needs Improvement = 1-9   | 10 | 10 |
|   | <ul style="list-style-type: none"><li>a. Were compliance actions sent to company officer or manager/board member if municipal/government system?</li><li>b. Were probable violations documented properly?</li><li>c. Resolve probable violations</li><li>d. Routinely review progress of probable violations</li><li>e. Did state issue compliance actions for all probable violations discovered?</li><li>f. Can state demonstrate fining authority for pipeline safety violations?</li><li>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)</li><li>h. Did state compliance actions give reasonable due process to all parties? Including "show cause" hearing, if necessary.</li><li>i. Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns</li><li>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)</li></ul> |    |    |



Evaluator Notes:

In last year's evaluation the program was severely deficient. Since then, the new PM has reconciled and dispositioned all outstanding compliance actions. The program appears compliant on all aspects of this question.

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|----------|--|----|----|
| <b>8</b> | (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:

No incidents/accidents occurred in CY2021.

- |          |  |   |   |
|----------|--|---|---|
| <b>9</b> | 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:

No deficiencies related to this question. Program was given an extension and an appropriate response was made last year.

- |           |  |           |           |
|-----------|--|-----------|-----------|
| <b>10</b> | 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:

Program has a seminar scheduled for April 2023, which will be late from the 2022 requirement.

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|-----------|---|-----------|-----------|
| <b>11</b> | 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 EcoElectrica during the standard inspection audit. Program will need to ensure NewFortress Energy gets their new asset submitted.

- |           |   |   |   |
|-----------|---|---|---|
| <b>12</b> | 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:

Last year's deficiency has been corrected - no issues this year.

- |           |  |   |   |
|-----------|--|---|---|
| <b>13</b> | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.7 | 1 | 1 |
|-----------|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Reviewed Pipeline Data Mart and found no safety related condition reports for CY2021.

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

Evaluator Notes:

Last year's deficiency has been corrected - no issues this year.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>15</b> | 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 CY2021 and prior years.

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|-----------|--|-----------|-----------|
| <b>16</b> | Were pipeline program files well-organized and accessible? | Info Only | Info Only |
|           | Info Only = No Points                                      |           |           |

Evaluator Notes:

No issues

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

Evaluator Notes:

PM is new into the position and did not accurately reflect inspection day needs. Program calculated 23 days, which is short of the 85-day minimum

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|-----------|---|-----------|-----------|
| <b>18</b> | Discussion on State Program Performance Metrics found on Stakeholder Communication site.\ <a href="http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805">http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805</a> | Info Only | Info Only |
|           | 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.

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|-----------|--|-----------|-----------|
| <b>19</b> | 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. <a href="https://pipelinesms.org/">https://pipelinesms.org/</a>   |           |           |
|           | 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

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- |           |                       |           |           |
|-----------|-----------------------|-----------|-----------|
| <b>20</b> | General Comments:     | Info Only | Info Only |
|           | Info Only = No Points |           |           |

Evaluator Notes:

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Total points scored for this section: 49  
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:

On 11/2/2022 Zuleika Ruiz met with New Fortress Energy in San Juan. This was an initial meeting of a facility that was commissioned in CY2020. They have a small jurisdictional transmission line that feeds the power plant adjacent to the facility. This operator has not submitted an annual report for this facility, nor are they operating nor are they operating this facility in accordance to 49 CFR 192. The PR DTOP conducted a standard inspection and will take steps to bring facility into compliance.

- 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 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 ensure 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.

- 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, exit interview was conducted and next steps discussed.

- 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, safety protocols were stringent and closely followed.

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**7 General Comments:**

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The inspection performed was unplanned. It was originally designed just to assess jurisdictional boundaries. The planned field inspection was for Tropigas de Puerto Rico at a facility in San Juan. However, Tropigas refused to comply with the inspection and didn't show up. PR DTOP is pursuing enforcement actions accordingly.

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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**

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues.<br>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.

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | 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)<br>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)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

**Evaluator Notes:**

PR had no excavation damages to gas facilities

- |          |   |   |   |
|----------|---|---|---|
| <b>3</b> | Has the state reviewed the operator's annual report pertaining to Part D - Excavation Damage?<br>Yes = 4 No = 0 Needs Improvement = 1-3 <ol style="list-style-type: none"><li>a. Is the information complete and accurate with root cause numbers?</li><li>b. Has the state evaluated the causes for the damages listed under "One-Call Notification Practices Not Sufficient" (Part D.1.a.)?</li><li>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?</li><li>d. Is the operator or its locating contractor(s) qualified and following written procedures for locating and marking facilities?</li><li>e. Is the operator appropriately requalifying locators to address performance deficiencies?</li><li>f. What is the number of damages resulting from mismarks?</li><li>g. What is the number of damages resulting from not locating within time requirements (no-shows)?</li><li>h. Is the operator appropriately addressing discovered mapping errors resulting in excavation damages?</li><li>i. Are mapping corrections timely and according to written procedures?</li><li>j. Has the state evaluated the causes for the damages listed under "Excavation Practices Not Sufficient" (Part D.1.c.)?</li></ol> | 4 | 4 |
|----------|---|---|---|

**Evaluator Notes:**

Puerto Rico recorded no excavation damages on regulated operators in CY 2020, therefore, full credit awarded.

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | 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?<br>Yes = 2 No = 0 Needs Improvement = 1 <ol style="list-style-type: none"><li>a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.</li><li>b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages?</li><li>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.</li><li>d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?</li></ol> | 2 | 2 |
|----------|---|---|---|

**Evaluator Notes:**

Puerto Rico recorded no excavation damages on regulated operators in CY 2020, therefore, full credit awarded. PR only has one operator that submits a GDAR, San Juan Gas, OPID 18116.

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**5** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

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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:

The PR DTOPW is not an interstate agent nor has a 60106 Agreement.

- 2 If inspections were conducted independent of a PHMSA team inspection was notice of all identified probable violations provided to PHMSA within 60 days? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

The PR DTOPW is not an interstate agent nor has a 60106 Agreement.

- 3 If inspections were conducted independent of a PHMSA team inspection was PHMSA immediately notified of conditions which may pose an immediate safety hazard to the public or environment? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

The PR DTOPW is not an interstate agent nor has a 60106 Agreement.

- 4 If inspections were conducted independent of a PHMSA team inspection did the state coordinate with PHMSA if inspections not were not included in the PHMSA Inspection Work Plan? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

The PR DTOPW is not an interstate agent nor has a 60106 Agreement.

- 5 Did the state take direction from and cooperate with PHMSA for all incident investigations conducted on interstate pipelines? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

The PR DTOPW is not an interstate agent nor has a 60106 Agreement.

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

Evaluator Notes:

The PR DTOPW is not an interstate agent nor has a 60106 Agreement.

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