



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

RHODE ISLAND DIVISION OF PUBLIC UTILITIES AND CARRIERS

### 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:** Rhode Island

**Agency Status:**

**Date of Visit:** 06/27/2022 - 06/30/2022

**Agency Representative:** Robert Bailey, P.E., Program Manager

**PHMSA Representative:** Agustin Lopez, State Evaluator

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

**Name/Title:** Ms. Linda George, Administrator

**Agency:** Rhode Island Division of Public Utilities & Carriers

**Address:** 89 Jefferson Boulevard

**City/State/Zip:** Warwick, RI 02888

**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 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	14
10	10
50	44
15	15
10	10
0	0

### TOTALS

**100 93**

**State Rating** ..... **93.0**

## 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. Verified operator data with Attachment 3 and and PDM.
- b. Reviewed state data to verify inspection days submitted on Attachment 2. Increase of inspection days is due to conducting daily inspection of operator facilities to assure compliance with regulations.
- c. Verified operators with PDM.
- d. No reportable incidents in 2021.
- e. RI issues Notices of Completion which are not counted as probable violations so Compliance Actions are higher than PV found.
- f. Reviewed records kept by RI.
- g. RI has waiver due to staff growth so no point loss due to not having Cat I and II.
- h. RI has adopted all regulations and amendments within the 2 year limit.
- i. Performance and damage prevention initiatives are described in Attachment 10.

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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:

Section V has inspection procedures which include pre and post inspection activities.

- |   |   |   |   |
|---|---|---|---|
| 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 | 3 |
|   | <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:

Section IV addresses the inspection planning which include the prioritizing of inspections and inspection intervals. Inspection planning takes in to account length since last inspection, operator history, activities, location and high risk units.

Procedures Section IV (C) does not establish inspection intervals for Transmission inspections, specifically- standard, O&M, IMP, PAPEI, D&A, OQ. Also LPG operators only have 5 year interval for "Standard" inspections. Procedure doe not address OQ and IMP for LPG operators.

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

Section V(Q)-(U) has procedures that identifies steps to take in case non compliance or probable violations are discovered during an inspection.

- |   |  |   |   |
|---|--|---|---|
| 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></ul>                       |   |   |

- b. If onsite investigation was not made, do procedures require on-call staff to obtain sufficient information to determine the facts to support the decision not to go on-site.

Evaluator Notes:

Yes, Section VI has incident investigation procedures which give guidance to inspectors on responding and conducting incident investigations. Section VI(B) describes mechanism to receive, record and respond to incident notifications. Section VI(B) has procedure to gather and document reason if no onsite investigation is conducted.

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5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Issues Identified:

B.2- Procedures Section IV (C) does not establish inspection intervals for Transmission inspections, specifically- standard, O&M, IMP, PAPEI, D&A, OQ. Also LPG operators only have 5 year interval for "Standard" inspections. Procedure doe not address OQ and IMP for LPG operators. There is a one point deduction for these issues

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Total points scored for this section: 14  
Total possible points for this section: 15



## PART C - State Qualifications

Points(MAX) Score

- |   |   |   |   |
|---|---|---|---|
| 1 | Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.3<br>Yes = 5 No = 0 Needs Improvement = 1-4  | 5 | 5 |
|   | <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:

Verified with TQ Blackboard that all lead inspectors are qualified to lead each type of inspection. Attempting to qualify staff to lead all inspections. Don Ledversis is only IMP qualified inspector.

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

Evaluator Notes:

Yes Robert Bailey has been Program Manager since 2019 and has taken TQ Courses. He is knowledgeable of the pipeline safety program and regulations.

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

Evaluator Notes:

The RIDPUC is mainly complying with 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

- |   |   |   |   |
|---|---|---|---|
| 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 | 2 |
|   | <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:

In reviewing randomly selected inspection reports, it was found that none of the LPG operators have had a DIMP, OQ, O&M or DA inspection. The only inspection reports available were standard inspections which include a check to verify plans were available (O&M, DA, IMP, etc). There were no inspection records to demonstrate the inspections were completed.

In addition there is no inspection record of an IMP, OQ, CRM or DA on Rhode Island LFG Genco transmission pipeline.

- |   |   |    |   |
|---|---|----|---|
| 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 | 9 |
|   | <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:

Reviewed inspection reports to assure the reports were fully complete and had all applicable regulations. In reviewing the randomly selected inspection reports, it was noted that the 2021 Nation Grid CRM inspection did not have any documentation of issues identified. The form utilized did not have a place to mark "UNSAT", "SAT", "N/A", "N/C", etc to demonstrate if there were issues identified during the inspection.

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

### Evaluator Notes:

In reviewing randomly selected inspection reports it was noted that there were no OQ Protocol 9/Form 15 inspections conducted on any of the LP operators. In addition there were only 2 OQ Protocol 9/ Form 15 inspections conducted on National Grid which does not seem to be sufficient to demonstrate or verify that operator personnel performing tasks are qualified.

- |   |  |   |   |
|---|--|---|---|
| 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 | 2 | 2 |
|---|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

- 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?
- b. Are states verifying with operators any plastic pipe and components that have shown a record of defects/leaks and mitigating those through DIMP plan?
- c. Are the states verifying operators are including low pressure distribution systems in their threat analysis?

Evaluator Notes:

Yes the RIDPUC is reviewing and inspecting National Grid's DIMP plan on a yearly basis. Plastic pipe and leak prone components and low pressure systems are monitored by the state.

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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 | 2 | 2 |
|---|--|---|---|

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);
- c. Operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21;
- d. Operator records of previous accidents and failures including reported third-party damage and leak response to ensure appropriate operator response as required by 192.617;
- e. Directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies;
- f. Operator procedures for considering low pressure distribution systems in threat analysis?
- g. Operator compliance with state and federal regulations for regulators located inside buildings?

Evaluator Notes:

Yes, the RIDPUC has incorporated the NTSB recommendation into the inspection forms.

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

RIDPUC discusses all advisory bulletins with the operators.

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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 | 10 | 10 |
|---|--|----|----|

Yes = 10 No = 0 Needs Improvement = 1-9

- 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 randomly selected inspection reports and verified that compliance actions were being completed per their procedures. There were no delays or breakdowns found during the reviews. All issued compliance actions were closed within reasonable time. An exit is conducted at the conclusion of the inspection in which a document is given to the operator if any issues are identified.

8	(Incident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations? Yes = 10 No = 0 Needs Improvement = 1-9	10	10
	<ul style="list-style-type: none"> <li>a. Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports?</li> <li>b. Did state keep adequate records of Incident/Accident notifications received?</li> <li>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?</li> <li>d. Were onsite observations documented?</li> <li>e. Were contributing factors documented?</li> <li>f. Were recommendations to prevent recurrences, where appropriate, documented?</li> <li>g. Did state initiate compliance action for any violations found during any incident/accident investigation?</li> <li>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?</li> <li>i. Does state share any lessons learned from incidents/accidents?</li> </ul>		

Evaluator Notes:

There were no reportable incidents in 2021.

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 Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

Yes, the RIDPUC responded within 60 days.

10	Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5 Info Only = No Points	Info Only	Info Only
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Evaluator Notes:

The last seminar was conducted virtually in 2021. Last face to face seminar was in 2019.

11	Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission? Info Only = No Points	Info Only	Info Only
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Evaluator Notes:

Yes, this is verified during inspections which is a question included in inspection 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). Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

Webpage has pipeline safety information which also includes civil penalties issued to operators.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>13</b> | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.7<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

There were no SRCR in 2021.

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

Evaluator Notes:

Yes, RI responds to surveys and information requests from PHMSA. Have not received WMS tasks in last couple of years.

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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.<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

There are no open waivers which require tracking or compliance follow up.

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

Evaluator Notes:

The RIDPUC is working on better tracking of inspection reports and being able to connect it with all correspondence. It was difficult at times to follow all completed documentation of an inspection during the evaluation.

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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?<br>Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
|-----------|---|---|---|

Evaluator Notes:

Met SICT inspection days and don't see issues meeting the days in 2022. Discussed that the follow up inspections should be added to the SICT if these types of inspections are part of their inspection plan.

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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><br>Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

Evaluator Notes:

Damages per 1,000 is below the national average. Inspector retention needs some improvement. Have lost inspectors in the last couple of years so training has trended down. Leaks are trending down may be due to removing cast iron pipe.

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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.<br>Info Only = No Points<br>a. <a href="https://pipelinesms.org/">https://pipelinesms.org/</a><br>b. Reference AGA recommendation to members May 20, 2019 | Info Only | Info Only |
|-----------|--|-----------|-----------|

Evaluator Notes:

Target operator was implementing PSMS but system was sold to new operator. Will meet new operator and discuss PSMS. Recommend to discuss PSMS during the seminars.

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- |           |                   |           |           |
|-----------|-------------------|-----------|-----------|
| <b>20</b> | General Comments: | Info Only | Info Only |
|-----------|-------------------|-----------|-----------|

Evaluator Notes:

Issues Identified:

D.1- In reviewing randomly selected inspection reports, it was found that none of the LPG operators have had a DIMP, OQ, O&M or DA inspection. The only inspection reports available were standard inspections which include a check to verify plans were available (O&M, DA, IMP, etc). There were no inspection records to demonstrate the inspections were completed.

In addition there is no inspection record of an IMP, OQ, CRM or DA on Rhode Island LFG Genco transmission pipeline.

There is a 3 point deduction for these issues.

D.2- Reviewed inspection reports to assure the reports were fully complete and had all applicable regulations. In reviewing the randomly selected inspection reports, it was noted that the 2021 Nation Grid CRM inspection did not have any documentation of issues identified. The form utilized did not have a place to mark "UNSAT", "SAT", "N/A", N/C, etc to demonstrate if there were issues identified during the inspection.

There was a 1 point deduction for this issue.

D.3-In reviewing randomly selected inspection reports it was noted that there were no OQ Protocol 9/Form 15 inspections conducted on any of the LP operators. In addition there were only 2 OQ Protocol 9/ Form 15 inspections conducted on National Grid which does not seem to be sufficient to demonstrate or verify that operator personnel performing tasks are qualified.

There was a 2 point deduction for this issue.

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Total points scored for this section: 44  
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:

Rhode Island Energy

Don Ledversis, Lead Inspector

Virtual Inspection

June 29, 2022

Agustin Lopez, State Evaluator

a. Corrosion Inspection

b. Last inspection in 2021

c. Yes, operator representatives were present during inspection.

d. Effort was made to evaluate different inspector.

- 
- 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, inspector utilized state form as a guide and to document inspection results.

- 
- 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:

Reviewed cast iron encroachment reports/summary records.

Corrosion control procedures and records: cp readings, rectifier readings, short sections, maps, atmospheric corrosion monitoring, etc.

- 
- 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, Don Ledversis is knowledgeable of the pipeline safety program and regulations.

- 
- 5 Did the inspector conduct an exit interview, including identifying probable violations? (If inspection is not totally completed the interview should be based on areas covered during time of field evaluation) 1 1  
Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

Yes an exit briefing was conducted at the conclusion. The following were discussed:

Corrosion Audit Take A ways 2022: Encroachment

1. Division needs a copy of the encroachment file as we didn't receive before audit.
2. Leak Survey Records.
3. Leak survey data ? 481 Broadway, Pawtucket, RI
4. Calibration files for trucks

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**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, the inspection was conducted in a safe, positive and constructive manner.

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**7** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Mr. Don Ledversis conducted an very good inspection. He has been in pipeline safety for many years and is very knowledgeable of the pipeline safety rules and regulations.

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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:**

Review Annual Reports for accuracy and negative trends. Any issues or high risk areas are identified and used for risk ranking. National Grid is the largest and only distribution operator in RI. Annual report review/inspection with National Grid was conducted in 2021.

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

RIDPUC conducts damage prevention inspections with operators to discuss damages submitted on Part D of the Annual Report. Review root cause and recurrence prevention during operator. National Grid is the largest and only operator in the state with damages.

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

RIDPUC conducts damage prevention inspections with operators to discuss damages submitted on Part D of the Annual Report. Review root cause and recurrence prevention during operator. National Grid damage prevention inspection was conducted in 2021 to verify operator compliance.

- |          |  |   |   |
|----------|--|---|---|
| <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></ol> | 2 | 2 |
|----------|--|---|---|

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

Evaluator Notes:

RIPUC uses PRIMIS data along with largest operator data which includes damages per 1,000 locates.

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**5 General Comments:**

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The RIDPUC is mainly complying with Part F of the evaluation.

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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:

RIPUC has 60105 Certification and 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:

RIPUC has 60105 Certification and 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:

RIPUC has 60105 Certification and 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:

RIPUC has 60105 Certification and 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:

RIPUC has 60105 Certification and is not an Interstate Agent.

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

Evaluator Notes:

RIPUC has 60105 Certification and is not an Interstate Agent.

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