



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

VERMONT DEPARTMENT OF PUBLIC SERVICE

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: Vermont

Agency Status:

Date of Visit: 09/27/2022 - 10/06/2022

Agency Representative: Mr. William Jordan
Director of Engineering

PHMSA Representative: Mr. Clint Stephens
State Liaison

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

Name/Title: Ms. June Tierney, Commissioner
Agency: Vermont Public Service Department
Address: 112 State Street
City/State/Zip: Montpelier, VT 05620

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
15
10
50
15
10
0

0
15
10
48
15
10
0

TOTALS

100 98

State Rating **98.0**

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:

- 1a. Will have to review number of LPG units in Attachment 1 in contrast with Attachment 3.
- 1b. Reviewed spreadsheet used to track inspection activity for accuracy on Attachment 2.
- 1c. Reviewed list of operators in Attachment 3 of Progress Report for accuracy.
- 1d. There were no incidents reported in CY 2021. LPG operator failed to report incident in 2021.
- 1e. Reviewed Attachment 5 of Progress Report for accuracy. "Number of Compliance Actions Taken" should be a 1.
- 1f. Reviewed Attachment 6 of Progress Report for accuracy with no issues.
- 1g. Reviewed Attachment 7 of Progress Report for accuracy with no issues.
- 1h. The VTPSC automatic adopts federal code amendments. This was not updated in Attachment 8 of the Progress Report.
- 1i. Reviewed Attachment 10 of Progress Report for synopsis of planned and past performance.

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



PART B - Program Inspection Procedures

Points(MAX) Score

- | | | | |
|---|---|---|---|
| 1 | Do written procedures address pre-inspection, inspection and post inspection activities for each of the following inspection types: Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none">a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspectionsb. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually)c. OQ Inspectionsd. Damage Prevention Inspectionse. On-Site Operator Trainingf. Construction Inspections (annual efforts)g. LNG Inspections | | |

Evaluator Notes:

Reviewed the VTPSD operations procedures and found the pre-inspection procedures, pages 7-8; inspection procedures found, pages 8 -12; and post-inspection procedures found pages 12 -15. There were no issues.

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|---|---|---|---|
| 2 | Do written procedures address inspection priorities of each operator, and if necessary each unit, based on the following elements and time frames established in its procedures? Chapter 5.1
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| | <ul style="list-style-type: none">a. Length of time since last inspectionb. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)c. Type of activity being undertaken by operators (i.e. construction)d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.)e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors)f. Are inspection units broken down appropriately? | | |

Evaluator Notes:

The written procedures which address inspection priorities is found on pages 8-10. Vermont Gas is inspected on an annual basis. During the winter months.

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|---|---|---|---|
| 3 | (Compliance Procedures) Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
| | <ul style="list-style-type: none">a. Procedures to notify an operator (company officer) when a noncompliance is identifiedb. Procedures to routinely review progress of compliance actions to prevent delays or breakdownsc. Procedures regarding closing outstanding probable violations | | |

Evaluator Notes:

The procedure for notifying a company officer is found on page 14; follow-up activities for compliance actions is found on page 13; and procedures regarding closing outstanding probable violation is found on page 13.

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|---|--|---|---|
| 4 | (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident?
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
| | <ul style="list-style-type: none">a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reportsb. If onsite investigation was not made, do procedures require on-call staff to obtain sufficient information to determine the facts to support the decision not to go on-site. | | |

Evaluator Notes:

The procedures to receive, record, and respond to operator reports of incidents; and procedures to not go on site for an incident investigation are found pages 15 -20.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues identified in Part B of the program evaluation.

Total points scored for this section: 15

Total possible points for this section: 15



PART C - State Qualifications

Points(MAX) Score

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|---|---|---|---|
| 1 | Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.3
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none">a. Completion of Required OQ Training before conducting inspection as leadb. Completion of Required DIMP/IMP Training before conducting inspection as leadc. Completion of Required LNG Training before conducting inspection as leadd. Root Cause Training by at least one inspector/program managere. Note any outside training completedf. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1) | | |

Evaluator Notes:

The inspector and program manager have fulfilled training requirements. Matt is on the waitlist for the ECDA course.

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

The state pipeline safety program manager has shown adequate knowledge of PHMSA program and regulations.

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| 3 | General Comments:
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

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

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



PART D - Program Performance

Points(MAX) Score

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

Evaluator Notes:

Reviewed inspection reports:

Standard: Vermont Gas Systems, Inc. (Distr) (4/4/22 & 8/22/18); Vermont Gas Systems, Inc. (Trans) (8/17/18); Blue Flame Gas Company, Inc. (7/9/21 & 12/30/16); Bournes Propane (8/9/21 & 7/31/19); Dead River Company (3/18/21, 3/11/21 & 12/30/16, 11/14/19); Freds Plumbing and Heating (4/5/18) Fyles Brothers, Inc. (5/5/21 & 8/10/17) ; Haskins Gas Service (6/17/21, 8/24/21, 8/24/21 & 8/11/17, 10/9/19); Highland Fuel Delivery dba Irving Energy Distribution Marketing (10/6/21 & 3/23/17); HOP Energy, LLC (Keyser Energy) (1/13/22 & 6/5/18); Jack F. Corse Co. (8/17/21, 8/17/21 & 2/5/20, 2/5/20); Jackman Fuels, Inc. (9/2/20); NGL Partners of Oklahoma (Osterman Propane) (4/12/21 & 9/29/16) ; Proctor Gas (3/3/21, 7/20/21, 7/20/21 & 9/14/16, 7/21/16); Surburban Propane Co. H (5/17/21, 8/12/21 ? Bennington & 8/24/17, 1/28/20); UGI Corp. dba Amerigas (7/2/21 & 8/8/17)

PA: Vermont Gas Systems, Inc. (Distr/Trans) (9/23/21 & 5/18/17); Blue Flame Gas Company, Inc. (9/4/19); Bournes Propane (5/6/19); Dead River Company (9/4/19); Freds Plumbing and Heating (9/4/18); Fyles Brothers, Inc. (5/9/19); Haskins Gas Service (7/2/19); Highland Fuel Delivery dba Irving Energy Distribution Marketing (9/4/19); HOP Energy, LLC (Keyser Energy) (5/28/19); Jack F. Corse Co. (7/29/19); Jackman Fuels, Inc. (7/29/19); NGL Partners of Oklahoma (Osterman Propane) (5/9/19); Proctor Gas

D&A: Vermont Gas Systems, Inc. (Distr/Trans) (4/1/21 & 11/14/16)

CRM: Vermont Gas Systems, Inc. (Trans) (3/15/18 & 1/25/22)

Construction: Vermont Gas Systems, Inc. (Distr) (9/10/21); Vermont Gas Systems, Inc. (Trans) (6/3/21)

OQ: Vermont Gas Systems, Inc. (Distr/Trans) (6/10/21 & 2/11/20); Blue Flame Gas Company, Inc. (2/12/20); Bournes Propane (8/21/20); Dead River Company (10/7/20); Freds Plumbing and Heating (8/25/20) Fyles Brothers, Inc. (9/3/20); Haskins Gas Service (6/25/20); Highland Fuel Delivery dba Irving Energy Distribution Marketing (7/22/21 & 10/15/20); HOP Energy, LLC (Keyser Energy) (6/5/18); Jack F. Corse Co. (3/29/22 & 8/8/17); Jackman Fuels, Inc. (9/2/20); NGL Partners of Oklahoma (Osterman Propane) (8/11/20); Proctor Gas (5/7/20); Surburban Propane Co. H (7/22/21 & 9/4/20); UGI Corp. dba Amerigas (7/19/21 &

DIMP/IMP: Vermont Gas Systems, Inc. (Distr) (11/17/21 & 3/1/17); Vermont Gas Systems, Inc. (Trans) (11/27/19); Blue Flame Gas Company, Inc. (9/23/20); Bournes Propane (4/6/22 & 11/16/15); Dead River Company (10/21/20); Freds Plumbing and Heating (3/19/21 & 12/4/15); Fyles Brothers, Inc. (2/10/21 & 11/11/15); Haskins Gas Service (10/30/21 & 11/23/15); Highland Fuel Delivery dba Irving Energy Distribution Marketing (5/19/21 & 12/2/15); HOP Energy, LLC (Keyser Energy) (5/25/22 & 4/18/18); Jack F. Corse Co. (12/22/20 & 12/18/15); Jackman Fuels, Inc. (12/23/20); NGL Partners of Oklahoma (Osterman Propane) (8/25/21 & 12/10/15); Proctor Gas (7/20/21 & 12/5/15); Surburban Propane Co. H (2/16/22 & 5/10/18); UGI Corp. dba Amerigas (4/26/21).

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| 2 | Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1. Do inspection records indicate that adequate reviews of procedures, records and field activities, including notes and the appropriate level of inspection person-days for each inspection, were performed?
Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohol | | |

- d. Control Room Management
- e. Part 193 LNG Inspections
- f. Construction
- g. OQ (see Question 3 for additional requirements)
- h. IMP/DIMP (see Question 4 for additional requirements)

Evaluator Notes:

Reviewed the following inspections: Standard - Blue Flame Gas Company, Inc. (7/9/21); Bournes Propane (8/9/21); Dead River Company (3/11/21); Fyles Brothers, Inc. (5/5/21); Haskins Gas Service (6/17/21 & 8/24/21); Jack F. Corse Co. (8/17/21); Highland Fuel Delivery dba Irving Energy Distribution Marketing (10/6/21); NGL Partners of Oklahoma (Osterman Propane) (4/12/21); ; Proctor Gas (3/3/21); Surburban Propane Co. H (5/17/21); and UGI Corp. dba Amerigas (7/2/21); D&A - Vermont Gas Systems, Inc. (Distr/Trans) (4/1/21); DIMP - Vermont Gas Systems, Inc. (Distr) (11/17/21); ; Freds Plumbing and Heating (3/19/21 ? became non-jurisdictional 6/22); Fyles Brothers, Inc. (2/10/21 ? suspense date of August 2021 ? no communication until closure 12/21); Haskins Gas Service (10/30/21); Highland Fuel Delivery dba Irving Energy Distribution Marketing (5/19/21); NGL Partners of Oklahoma (Osterman Propane) (8/25/21); Proctor Gas (7/20/21); and UGI Corp. dba Amerigas (4/26/21).

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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 | 2 | 2 |
| | Yes = 2 No = 0 Needs Improvement = 1 | | |

Evaluator Notes:

VTDPD completed numerous field OQ inspections in 2021, however, no OQ program inspections were due in 2021. There were no issues.

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| 4 | Is state verifying operator's integrity management Programs (IMP and DIMP)? This should include a review of plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operator's plan(s). 49 CFR 192 Subparts O and P | 2 | 2 |
| | Yes = 2 No = 0 Needs Improvement = 1 | | |
| | <ul style="list-style-type: none"> 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:

Reviewed the following inspection reports: Vermont Gas Systems, Inc. (Distr) (11/17/21); Freds Plumbing and Heating (3/19/21 ? became non-jurisdictional 6/22); Fyles Brothers, Inc. (2/10/21); Haskins Gas Service (10/30/21); Highland Fuel Delivery dba Irving Energy Distribution Marketing (5/19/21); NGL Partners of Oklahoma (Osterman Propane) (8/25/21); Proctor Gas (7/20/21); and UGI Corp. dba Amerigas (4/26/21). VTDPD uses IA for its DIMP and IMP inspections.

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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 | | |
| | <ul style="list-style-type: none"> a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken; b. Operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance); c. Operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21; | | |

- d. Operator records of previous accidents and failures including reported third-party damage and leak response to ensure appropriate operator response as required by 192.617;
- e. Directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies;
- f. Operator procedures for considering low pressure distribution systems in threat analysis?
- g. Operator compliance with state and federal regulations for regulators located inside buildings?

Evaluator Notes:

- 5a. & 5b. N/A - no cast iron pipe in Vermont.
- 5c. ? was discussed with operator during the 2022 standard inspection.
- 5d. - Met with Vermont Gas on to discuss excavation damage and third- party damage on 6/4/21.
- 5e. ? This was covered during Vermont Gas DIMP inspection in 2021.
- 5f. - Vermont has no operators with low pressure distribution systems.
- 5g. - This was covered during Vermont Gas DIMP inspection in 2021.

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

ADB's were discussed with Vermont Gas Systems during the 2021 DIMP inspection.

7	(Compliance Activities) Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1 Yes = 10 No = 0 Needs Improvement = 1-9	10	8
	<ul style="list-style-type: none"> a. Were compliance actions sent to company officer or manager/board member if municipal/government system? b. Were probable violations documented properly? c. Resolve probable violations d. Routinely review progress of probable violations e. Did state issue compliance actions for all probable violations discovered? f. Can state demonstrate fining authority for pipeline safety violations? g. Does Program Manager review, approve and monitor all compliance actions? (note: Program Manager or Senior Official should sign any NOPV or related enforcement action) h. Did state compliance actions give reasonable due process to all parties? Including "show cause" hearing, if necessary. i. Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns j. Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. (Incident investigations do not need to meet 30/90-day requirement) 		

Evaluator Notes:

The following inspection reports Bournes Propane (8/9/21 ? final response received 8/25/22 ? not closed); Dead River Company (3/11/21 - still open with no record of communication for three open compliance issues); Haskins Gas Service (8/24/21 ? last communication 7/29/22 ? still open) ; Jack F. Corse Co. (8/17/21 ? still open with 8/17/22 deadline ? no communication) ; DIMP - Fyles Brothers, Inc. (2/10/21 ? suspense date of August 2021 ? no communication until closure 12/21); Haskins Gas Service (10/30/21 ? deadline to send compliance action 6/22- but no letter sent as of day of evaluation) . The VTPSD needs to improve the tracking process from discovery to resolution of probable violations.

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
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- a. Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports?
- b. Did state keep adequate records of Incident/Accident notifications received?
- c. If onsite investigation was not made, did the state obtain sufficient information from the operator and/or by means to determine the facts to support the decision not to go on site?
- d. Were onsite observations documented?
- e. Were contributing factors documented?
- f. Were recommendations to prevent recurrences, where appropriate, documented?
- g. Did state initiate compliance action for any violations found during any incident/accident investigation?
- h. Did state assist Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA?
- i. Does state share any lessons learned from incidents/accidents?

Evaluator Notes:

The one reportable incident in 2021 was not reported by operator until 2022. This was communicated to Carrie Winslow for inclusion in the 2021 Gas Progress Report.

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| 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:

Chair letter sent on October 26, 2021; response received on December 2, 2021. No issue.

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| 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 VTPSD participated in a New England region pipeline safety seminar on April 27,28, & 29, 2021.

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| 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:

Information submitted by Vermont Gas 4/10/21.

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| 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:

VTPSD participated in underground awareness seminars and pipeline safety information is on the state website.

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| 13 | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.7
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

VTPSD has no open SRC reports.

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

VTPSD did submit information request to NAPS or PHMSA. VTPSD has WMS task to perform.

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

VTPSD has no waivers/special permits.

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| 16 | Were pipeline program files well-organized and accessible?
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

Files were well organized and accessible.

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

Discussed accuracy of inspection day information submitted into SICT tool with a change from 90 inspection days in 2021 to 85 days in 2022.

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| 18 | Discussion on State Program Performance Metrics found on Stakeholder Communication site.\ http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

Discussed State Program Performance Metrics with VTDPS.

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| 19 | Did the state encourage and promote operator implementation of Pipeline Safety Management Systems (PSMS), or API RP 1173? This holistic approach to improving pipeline safety includes the identification, prevention and remediation of safety hazards.
Info Only = No Points
a. https://pipelinesms.org/
b. Reference AGA recommendation to members May 20, 2019 | Info Only | Info Only |
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Evaluator Notes:

Vermont Gas has adopted PSMS which is the largest operator in the state of Vermont.

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| 20 | General Comments:
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

There was one issue identified in Part D of the program evaluation. The VYPSD did not do an adequate job of tracking all enforcement actions from the discover to resolution.

Total points scored for this section: 48
Total possible points for this section: 50

PART E - Field Inspections

Points(MAX) Score

- 1 Operator, Inspector, Location, Date and PHMSA Representative (enter specifics into the comments box below) Info Only Info Only

Info Only = No Points

- What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc)
- When was the unit inspected last?
- Was pipeline operator or representative present during inspection?
- Effort should be made to observe newest state inspector with least experience

Evaluator Notes:

Operator: Vermont Gas Systems (Northeast Underground ? contractor)

Inspector: Matt Hecklinger

Location: New Haven, VT

Date: October 6, 2022

PHMSA Rep.: Clint Stephens

Type of Inspection: Installing new 2" plastic service line.

The operator's third-party inspector was on site during the installation of the service line.

- 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 VTPSD used the Service Installation Checklist as a guide for the inspection.

- 3 Did the inspector adequately review the following during the inspection 10 10
- Yes = 10 No = 0 Needs Improvement = 1-9
- Procedures (were the inspector's questions of the operator adequate to determine compliance?)
 - Records (did the inspector adequately review trends and ask in-depth questions?)
 - Field Activities/Facilities (did inspector ensure that procedures were being followed, including ensuring that properly calibrated equipment was used and OQ's were acceptable?)
 - Other (please comment)
 - Was the inspection of adequate length to properly perform the inspection?

Evaluator Notes:

The inspector reviewed the following:

Procedures: Plastic pipe fusion

Records: OQ records

Field Activities: Plastic pipe fusing (butt and electrofusion), and pressure test of service

- 4 From your observation did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) 2 2
- Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

From my observation the inspector had adequate knowledge of the pipeline safety program and regulations.

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

Evaluator Notes:

The operator's contractor was informed during the construction process of any concerns or compliance issues. There were

issues identified during the inspection.

6 Was inspection performed in a safe, positive, and constructive manner ?

Info Only Info Only

Info Only = No Points

- a. No unsafe acts should be performed during inspection by the state inspector
- b. What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)
- c. Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)
- d. Other

Evaluator Notes:

The inspection was performed in a safe, positive, and constructive manner. The inspector observed the installation of a new 2" plastic service line. The inspector did a good job of communicating with the operator, such as, requesting procedures, OQ records, and field observations.

7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

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

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



PART F - Damage prevention and Annual report analysis

Points(MAX) Score

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

Evaluator Notes:

Reviewed data analysis from the 2021 operator annual report (Vermont Gas System). This data was analyzed for accuracy and trends. The VTPSD with Vermont Gas in 2021 to discuss damage prevention efforts in Vermont.

- | | | | |
|---|--|---|---|
| 2 | Has the state verified that the operators analyze excavation damages for the purpose of determining root causes and minimizing the possibility of a recurrence? (192.617)
Has the state verified that the operators have appropriately identified excavators who have repeatedly violated one-call laws and damaged their facilities. Have the operators taken steps to mitigate that risks? (192.1007)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Reviewed charts which indicated Vermont Gas is analyzing excavation damages that determine those excavators that repeatedly violated one-call laws and damaged their facilities. Root cause has been determined in order to minimize the possibility of recurrence.

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

Evaluator Notes:

VTPSD has reviewed the operator's annual report pertaining to part D - Excavation Damage. During the program evaluation, I reviewed charts identifying those areas that caused damages to the pipeline facility of Vermont Gas. The charts were in detail as described in Part D of the annual report. There were no issues.

- | | | | |
|---|--|---|---|
| 4 | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests?
Yes = 2 No = 0 Needs Improvement = 1 <ol style="list-style-type: none">a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages?c. Has the state evaluated which of the following best describes the reason for the excavation damages; i.e., operator or contractor not following written procedures, failure to maintain marks, failure to support exposed facilities, failure to use hand tools were required, failure to test-hole (pot hole), improper backfilling practices, failure to maintain clearance or insufficient excavation practices. | 2 | 2 |
|---|--|---|---|

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

Evaluator Notes:

Vermont Gas has determined that contractors cause the most damages to their pipeline facilities from 2019 ? 2021. Vermont Gas sends a "Digsafe packet" to each excavator that damages its pipeline. This is part of the training and education for the excavators.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues identified in Part F of the program evaluation.

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



PART G - Interstate Agent/Agreement States

Points(MAX) Score

- 1 Were all inspections of interstate pipelines conducted using the Inspection Assistant program for documenting inspections? Info Only Info Only
Info Only = No Points

Evaluator Notes:

VTPSD 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:

VTPSD 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:

VTPSD 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:

VTPSD 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:

VTPSD is not an interstate agent.

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

Evaluator Notes:

VTPSD is not an interstate agent.

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