

# 2009 Natural Gas State Program Evaluation

for

#### NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

# Document Legend PART:

U.S. Department of Transportation

Materials Safety Administration

**Pipeline and Hazardous** 

O -- Representative Date and Title Information

A -- General Program Qualifications

B -- Inspections and Compliance - Procedures/Records/Performance

C -- Interstate Agent States

D -- Incident Investigations

E -- Damage Prevention Initiatives

F -- Field Inspection

G -- PHMSA Initiatives - Strategic Plan

H -- Miscellaneous

I -- Program Initiatives

### 2009 Natural Gas State Program Evaluation -- CY 2009 Natural Gas

State Agency: New Hampshire Rating:

Agency Status: 60105(a): Interstate Agent:

**Date of Visit:** 

Agency Representative: PHMSA Representative:

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

Name/Title: Agency: Address: City/State/Zip:

#### **INSTRUCTIONS:**

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2009 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. 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 then the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual certification/agreement attachments provide the basis for determining the state's pipeline safety grant allocation.

#### **Field Inspection (PART F):**

The field inspection form used will allow different areas of emphasis to be considered for each question. Question 13 is provided for scoring field observation areas. In completing PART F, the PHMSA representative should include a written summary which thoroughly documents the inspection.

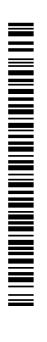
#### **Scoring Summary**

A General Program Quali B Inspections and Compl: C Interstate Agent States D Incident Investigations E Damage Prevention Ini F Field Inspection G PHMSA Initiatives - St H Miscellaneous I Program Initiatives TOTALS State Rating	ance - Procedures/Records/Performance	26 23.5 0 6
B Inspections and Comple C Interstate Agent States D Incident Investigations E Damage Prevention Ini F Field Inspection	ance - Procedures/Records/Performance	0
C Interstate Agent States D Incident Investigations E Damage Prevention Ini F Field Inspection	tiatives	0 6
D Incident Investigations E Damage Prevention Ini F Field Inspection	tiatives	6
<ul><li>E Damage Prevention Ini</li><li>F Field Inspection</li></ul>	tiatives	0
F Field Inspection		7
		11
G PHMSA Initiatives - St	rategic Plan	10
H Miscellaneous	-	3
I Program Initiatives		9
TOTALS		97.5
State Rating		



1	Certifica attachme	state submit complete and accurate information on the attachments to its most current 60105(a) tition/60106 (a) Agreement? (NOTE: PHMSA Representative to verify certification/agreement ents by reviewing appropriate state documentation. Score a deficiency in any one area as "needs ment". Attachment numbers appear in parenthesis) Previous Question A.1, Items a-h worth 1 point	8
		o = 0 Needs Minor Improvement = 3-7 Needs Major Improvement = 2	
	a.	State Jurisdiction and agent status over gas facilities (1)	
	b.	Total state inspection activity (2)	
	c.	Gas facilities subject to state safety jurisdiction (3)	
	d.	Gas pipeline incidents (4)	
	e.	State compliance actions (5)	
	f.	State record maintenance and reporting (6)	
		State employees directly involved in the gas pipeline safety program (7)	
	g.		
SLR No	h. tes:	State compliance with Federal requirements (8)	
2	with 601 property	state have an adequate mechanism to receive operator reporting of incidents to ensure state compliance 105(a) Certification/60106(a) Agreement requirements (fatality, injury requiring hospitalization, damage exceeding \$50,000 - Mechanism should include receiving "after hours" reports)? (Chapter 6) to 20 cm = 0	1
SLR No			
3 SLR No	state req be held a Yes = 2 No	state held a pipeline safety TQ seminar(s) in the last 3 years? (NOTE: Indicate date of last seminar or if uested seminar, but T&Q could not provide, indicate date of state request for seminar. Seminars must at least once every 3 calendar years.) (Chapter 8.5) Previous Question A.4  Dec = 0	2
4		peline safety program files well-organized and accessible?(NOTE: This also includes electronic files) r 5) Previous Question A.5	1
SLR No	tes:		
5	of PHM	e records and discussions with the state pipeline safety program manager indicate adequate knowledge SA program and regulations? (Chapter 4.1, Chapter 8.1) Previous Question A.6  o = 0 Needs Improvement = 1	2
SLR No	tes:		
6	Region's	state respond in writing within 60 days to the requested items in the Chairman's letter following the slast program evaluation? (No response is necessary if no items are requested in letter and mark "Yes") results (8.1) Previous Question A.8	1
SLR No	tes:		
7		tions, if necessary, did the State initiate as a result of issues raised in the Chairperson's letter from the year? Did actions correct or address deficiencies from previous year's evaluation? (No response is	1

necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8/A.9



Yes = 1 No = 0

### Personnel and Qualifications

Has each inspector fulfilled the 3 year TQ training requirement? If No, has the state been granted a waiver regarding TQ courses by the Associate Administrator for Pipeline Safety? (NOTE: If the State has new inspectors who have not attended all TQ courses, but are in a program which will achieve the completion of all applicable courses within 3 years of taking first course (5 years to successfully complete), or if a waiver has been granted by the applicable Region Director for the state, please answer yes.) (Chapter 4.4) Previous Question A.10

Yes = 3 No = 0

3

SLR Notes:

**9** Brief Description of Non-TQ training Activities:

Info Only

Info Only = No Points

For State Personnel:

For Operators:

For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:

SLR Notes:

Did the lead inspectors complete all required T&Q OQ courses and Computer Based Training (CBT) before conducting OQ Inspections? (Chapter 4.4.1) Previous Question A.12
Yes = 1 No = 0

1

SLR Notes:

Did the lead inspectors complete all required TQ Integrity Management (IMP) Courses/Seminars and CBT before conducting IMP Inspections? (Chapter 4.4.1) Previous Question A.13

Yes = 1 No = 0

SLR Notes:

Was the ratio acceptable of Total inspection Person-days to Total Person-days charged to the program by state inspectors? (Region Director may modify points for just cause) (Chapter 4.3) Previous Question B.12

Yes = 5 No = 0

5

A. Total Inspection Person Days (Attachment 2):

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):

Ratio: A / B

If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0

SLR Notes:

Have there been modifications or proposed changes to inspector-staffing levels? (If yes, describe) Previous Info Only Question B.13
Info Only = No Points

14 Part-A General Comments/Regional Observations
Info Only = No Points

Info Only

SLR Notes:



# PART B - Inspections and Compliance - Procedures/Records/ Performance

Points(MAX) Score

1	Does the State have a written inspection plan to complete the following? (all types of operators including LNG) (Chapter 5.1) Previous Question B.1 + Chapter 5 Changes + Incorporate LNG Yes = 6.5 No = 0 Needs Improvement = 50% Deduction	6.5		
	a Standard Inspections (Including LNG) (Max points = 2)	Yes 🔘	No 🔾	Needs Improvement
	b IMP Inspections (Including DIMP) (Max points = .5)	Yes 🔘	No 🔾	Needs Improvement
	c OQ Inspections (Max points = .5)	Yes 🔘	No 🔾	Needs Improvement
	d Damage Prevention (Max points = .5)	Yes 🔘	No 🔾	Needs Improvement
	e On-Site Operator Training (Max points = .5)	Yes 🔘	No 🔾	Needs Improvement
	f Construction Inspections (Max points = .5)	Yes 🔘	No 🔘	Needs Improvement
	g Incident/Accident Investigations (Max points = 1)	Yes 🔘	No 🔾	Needs Improvement
	h Compliance Follow-up (Max points = 1)	Yes 🔘	No 🔾	Needs Improvement
SLR No	otes:			
2	Did the written Procedures for selecting operators adequately address key concerns? (Chapter 5.1) Previous Question B.2, items a-d are worth .5 point each Yes = 2 No = 0 Needs Improvement = 50% Deduction	2		
	a Length of time since last inspection	Yes 🔾	No 🔾	Needs Improvement
	b History of Operator/unit and/or location (including leakage , incident and compliance history)	Yes 🔾	No 🔾	Needs Improvement
	c Type of activity being undertaken by operator (construction etc)	Yes 🔾	No 🔾	Needs Improvement
a	d For large operators, rotation of locations inspected	Yes 🔾	No 🔾	Needs Improvement
SLR No	otes:			
Ins	spection Performance			
3	Did the state inspect all types of operators and inspection units in accordance with time intervals established in its written procedures? (Chapter 5.1) Previous Question B.3 $Y_{es} = 2 N_0 = 0$	2		
SLR No	otes:			
4	Did the state inspection form cover all applicable code requirements addressed on the Federal Inspection forms? (Chapter 5.1 (3)) Previous Question B.4 $Yes = 1 No = 0$	1		
SLR No	otes:			
5 SLD No	Did state complete all applicable portions of inspection forms? (Chapter 5.1 (3)) Previous Question B.5 $Yes = 1 No = 0$	1		
SLR No	nes.			

Did the state initiate appropriate follow-up actions to Safety Related Condition Reports? (Chapter 6.3)

SLR Notes:

Previous Question B.6 Yes = .5 No = 0

Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence

of graphitization and if necessary remedial action was taken? (NTSB) Previous Question B.7



.5

SLR No	has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation) Previous Question $D(1).4$ Yes = 1 No = 0  SLR Notes:					
16	Did the state follow its written procedures for reviewing compliance actions and follow-up to determine that prompt corrective actions were taken by operators, within the time frames established by the procedures and compliance correspondence, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? Previous Question D(1).5  Yes = 1 No = 0 Needs Improvement = .5	1				
SLR No						
17	If compliance could not be established by other means, did state pipeline safety program staff request formal action, such as a "Show Cause Hearing" to correct pipeline safety violations? (check each states enforcement procedures) Previous Question $D(1).6$ $N_0 = 0$ Yes = 1	1				
SLR No	tes:					
18	Did the state adequately document the resolution of probable violations? (Chapter 5.1 (6)) Previous Question D(1).7  Yes = 1 No = 0 Needs Improvement = .5	1				
SLR No						
19	Were compliance actions sent to a company officer? (manager or board member if municipal/government system) (Chapter $5.1(4)$ ) Previous Question D(1).8 $_{Yes=.5\ No=0}$	.5				
SLR No	tes:					
20	Did the compliance proceedings give reasonable due process to all parties? (check each states enforcement procedures) Previous Question $D(1).9$ Yes = 1 No = 0 Needs Improvement = .5	1				
SLR No	tes:					
Co	mpliance - 60106(a) States					
SLR No	Did the state use the current federal inspection form(s)? Previous Question D(2).1  Yes = 1 No = 0 Needs Improvement = .5  tes:	1				
22	Are results adequately documented demonstrating inspection units were reviewed in accordance with state inspection plan? Previous Question $D(2).2$ Yes = $1 \text{ No} = 0 \text{ Needs Improvement} = .5$	1				
SLR No	tes:					
23	Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable	1				

violations; any change requires written explanation.) Previous Question D(2).3

Yes = 1 No = 0 Needs Improvement = .5

Has the State issued compliance actions for all probable violations discovered? (Note: PHMSA representative

SLR Notes:

24	Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the publi or to the environment? Previous Question $D(2).4$ Yes = $1 \text{ No} = 0 \text{ Needs Improvement} = .5$	c 1
SLR No	tes:	
25	Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(2).5  Yes = 1 No = 0 Needs Improvement = .5	1
SLR No	tes:	
26	Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? Previous Question D(2).6  Yes = 1 No = 0 Needs Improvement = .5	1
SLR No	tes:	
27	Part B: General Comments/Regional Observations Info Only = No Points	Info Only
SLR No	·	
	Total pos	sible points for this section: 23.5



1	Did the state use the current federal inspection form(s)? Previous Question D(3).1  Yes = 1 No = 0 Needs Improvement = .5	1
SLR Not		
2	Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? Previous Question D(3).2  Yes = 1 No = 0 Needs Improvement = .5	1
SLR Not		
3	Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? Previous Question $D(3).3$ Yes = $1 \text{ No} = 0$	1
SLR Not	tes:	
4	Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) Previous Question D(3).4 $_{Yes=1\ No=0}$	1
SLR Not	tes:	
5	Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question $D(3).5$ Yes = $1 \text{ No} = 0 \text{ Needs Improvement} = .5$	1
SLR Not	tes:	
6	Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(3).6 Yes = 1 No = 0	1
SLR Not	tes:	
7	Did the state initially submit documentation to support compliance action by PHMSA on probable violations? Previous Question D(3).7  Yes = 1 No = 0 Needs Improvement = .5	1
SLR Not	•	



Total possible points for this section: 0

Info Only

8

SLR Notes:

Info Only = No Points

Part C: General Comments/Regional Observations

<b>1</b> SLR No	Are state personnel following the procedures for Federal/State cooperation in case of an incident? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6.1) Previous Question E.1  Yes = 1 No = 0 Needs Improvement = .5	1		
SLK NO	ites.			
2	Are state personnel familiar with the jurisdictional authority and Memorandum of Understanding between NTSB and PHMSA? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6 ? Appendix D) Previous Question E.2  Yes = .5 No = 0	.5		
SLR No	ites:			
3	Did the state keep adequate records of incident notifications received? Previous Question E.3  Yes = 1 No = 0 Needs Improvement = .5	1		
SLR No	tes:			
4	If an onsite investigation of an incident was not made, did the state obtain sufficient information by other means to determine the facts and support the decision not to go on-site? Previous Question E.4  Yes = 1 No = 0 Needs Improvement = .5	1		
SLR No				
5	Were investigations thorough and conclusions and recommendations documented in an acceptable manner? Previous Question E.5, comprehensive question worth 2 points total  Yes = 2 No = 0 Needs Improvement = 1	2		
	a. Observations and Document Review	Yes 🔾	No 🔾	Needs Improvement
	b. Contributing Factors	Yes 🔘	No 🔾	Needs Improvement
SLR No	c. Recommendations to prevent recurrences where appropriate	Yes 🔘	No 🔾	Needs Improvement
SLK NO	nes.			
6	Did the state initiate enforcement action for violations found during any incident investigation(s)? Previous Question E.6 Variation  Yes = 1 No = 0 Needs Improvement = .5	1		
SLR No	tes:			
7	Did the state assist region office by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate annual report data from operators concerning incidents/accidents and investigate discrepancies) (Chapter 6) Previous Question E.7/E.8  Yes = .5 No = 0	.5		
SLR No	ites:			
8	Part D: General Comments/Regional Observations Info Only = No Points	Info Only		





1 SLR Not	Has the state reviewed 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? Previous Question B.11 Yes = 2 No = 0 Needs Improvement = 1 es:	2
2	Did the state inspector check to assure the pipeline operator is following its written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? New $2008$ $Y_{es} = 2 N_0 = 0$	2
SLR Not	es:	
3 SLR Not	Did the state encourage and promote the adoption of the Common Ground Alliance Best Practices document to its regulated companies as a means of reducing damages to all underground facilities? Previous Question A.7 Yes = 2 No = 0 Needs Improvement = 1	2
4 SLR Not	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? New 2008 $_{\text{Yes}=1 \text{ No}=0}$ ees:	1
5	Did the state review operators' records of accidents and failures due to excavation damage to ensure causes of failure are addressed to minimize the possibility of recurrence as required by 192.617? $Y_{es} = 2 N_0 = 0$	2
SLR Not		
6 SLR Not	Part E: General Comments/Regional Observations Info Only = No Points es:	Info Only

1	Operator, Inspector, Location, Date and PHMSA Representative  Info Only = No Points	Info Only
	Name of Operator Inspected:	
	Name of State Inspector(s) Observed:	
	Location of Inspection:	
	Date of Inspection:	
	Name of PHMSA Representative:	
SLR Not	es:	
2	Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? New 2008 $ \text{Yes} = 1 \text{ No} = 0 $	I
SLR Not	es:	
3	Did the inspector use an acceptable inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) Previous Question F.2 $_{\text{Yes}=2 \text{ No}=0}$	2
SLR Not	es:	
4	Did the inspector thoroughly document results of the inspection? Previous Question F.3 $Yes = 2 No = 0$	2
SLR Not	es:	
5	Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps, pyrometer, soap spray, CGI, etc.) New 2008  Yes = 1 No = 0	1
SLR Not	es:	
6	What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc) New 2008  Info Only = No Points	Info Only
SLR Not	es:	
7	Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) New 2008, comprehensive question worth 2 points total  Yes = 2 No = 0 Needs Improvement = 1	2
	a. Procedures	
	b. Records	
	c. Field Activities/Facilities	
	d Other (Please Comment)	

SLR Notes:



Navigable Waterway Crossings

			Total possible points for this section: 11
SLR Not	es:		
	Info Only	= No Points	·
14	Part F: (	General Comments/Regional Observations	Info Only
SLR Not	es:		_
	J.	Other	
	I.	Atmospheric Corrosion	
	Н.	Compliance Follow-up	
	G.	OQ - Operator Qualification	
	F.	Welding	
	D. E.	Vault Maintenance	
	C.	Tapping Valve Maintenance	
	B.	Signs	
	Α.	Repairs	
	Z.	Prevention of Accidental Ignition	
	y.	Purging	
	Χ.	Public Education	
	W.	Plastic Pipe Installation	
	v.	Overpressure Safety Devices	
	u.	Odorization	



1.5

## Risk base Inspections - Targeting High Risk Areas

1 Does state have process to identify high risk inspection units?

Yes = 1.5 No = 0

Risk Factors (criteria) to consider may include:

Miles of HCA's, Geographic area, Population Density

Length of time since last inspection

History of Individual Operator units (leakage, incident and compliance history, etc.)

Threats - (Excavation Damage, Corrosion, Natural Forces, Other Outside Forces, Material or Welds,

Equipment, Operations, Other)

SLR Notes:

2 Are inspection units broken down appropriately? (see definitions in Guidelines)

.5

Yes = .5 No = 0

SLR Notes:

3 Consideration of operators DIMP Plan? (if available and pending rulemaking)

Info Only

Info Only = No Points

SLR Notes:

4 Does state inspection process target high risk areas?

.5

Yes = .5 No = 0

SLR Notes:

# Use of Data to Help Drive Program Priority and Inspections

Does state use data to analyze effectiveness of damage prevention efforts in the state? (DIRT or other data, etc)

Yes = .5 No = 0

SLR Notes:

6 Has state reviewed data on Operator Annual reports for accuracy?

.5

Yes = .5 No = 0

SLR Notes:

7 Has state analyzed annual report data for trends and operator issues?

.5

.5

Yes = .5 No = 0 SLR Notes:

8 Has state reviewed data on Incident/Accident reports for accuracy?

Yes = .5 No = 0



,	Does state do evaluation of effectiveness of program based on data? (i.e. performance measures, trends, etc.)	
SLR Not	Yes = .5 No = 0 es:	
10 SLR Not	Did the State input all operator qualification inspection results into web based database provided by PHMSA in a timely manner upon completion of OQ inspections? Previous Question B.15  Yes = .5 No = 0  es:	.5
11	Did the State submit their replies into the Integrity Management Database (IMDB) in response to the Operators notifications for their integrity management program? Previous Question B.16 $_{\text{Yes}=.5 \text{ No}=0}$	.5
SLR Not	es:	
12	Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17 $Yes = .5\ No = 0$	.5
SLR Not	es:	
13	Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns? Previous Question B.18  Yes = .5 No = 0	s .5
SLR Not	es:	
14	Has state confirmed transmission operators have submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submission?  Yes = .5 No = 0	5
SLR Not		
Acc	cident/Incident Investigation Learning and Sharing Lessons Learn	ned
15	Has state shared lessons learned from incidents/accidents? (i.e. NAPSR meetings and communications)  Yes = .5 No = 0	.5
SLR Not	es:	
16	Does the State support data gathering efforts concerning accidents? (Frequency/Consequence/etc)	.5
SLR Not	Yes = $.5 \text{ No} = 0$	
17	Does state have incident/accident criteria for conducting root cause analysis?	Info Only
SLR Not	Info Only = No Points  es:	

Has state participated on root cause analysis training? (can also be on wait list) Yes = .5 No = 0

.5

Transparency - Communication with Stakeholders

Other than pipeline safety seminar does State communicate with stakeholders? (Communicate program data, pub awareness, etc.) Yes = .5 No = 0

Does state share enforcement data with public? (Website, newsletters, docket access, etc.)

.5

22 Part G: General Comments/Regional Observations Info Only = No Points

Info Only

SLR Notes:



1	What were the major accomplishments for the year being evaluated? (Describe the accomplishments, NAPSR Activities and Participation, etc.)  Yes = .5 No = 0	.5
SLR No		
2	What legislative or program initiatives are taking place/planned in the state, past, present, and future? (Describe initiatives (i.e. damage prevention, jurisdiction/authority, compliance/administrative, etc.)  Yes = .5 No = 0	.5
SLR No	tes:	
3 SLR No	Any Risk Reduction Accomplishments/Projects? (i.e. Cast iron replacement projects,bare steel,third-party damage reductions, etc.)  Yes = .5 No = 0  tes:	.5
4	Did the state participate in/respond to surveys or information requests from NAPSR or PHMSA? $Y_{es} = 1 N_0 = 0$	1
SLR No	tes:	
5	Sharing Best Practices with Other States - (General Program) Yes = .5 No = 0	.5
SLR No	tes:	
6	Part H: General Comments/Regional Observations  Info Only = No Points	Info Only
SLR No		



Yes = 1 No = 0

## Drug and Alcohol Testing (49 CFR Part 199)

Has the state verified that operators have drug and alcohol testing programs?

SLR Notes:

Is the state verifying that operators are conducting the drug and alcohol tests required by the operators program (random, post-incident, etc.) Yes = .5 No = 0

.5

SLR Notes:

3 Is the state verifying that any positive tests are responded to in accordance with the operator's program? .5

SLR Notes:

## Qualification of Pipeline Personnel (49 CFR Part 192 Subpart N)

Has the state verified that operators have a written qualification program?

1

Yes = 1 No = 0

SLR Notes:

5 Has the state reviewed operator qualification programs for compliance with PHMSA rules and protocols? Yes = .5 No = 0

.5

SLR Notes:

Is the state verifying that persons who perform covered tasks for the operator are qualified in accordance with the operator's program? Yes = .5 No = 0

.5

SLR Notes:

Is the state verifying that persons who perform covered task for the operator are requalified at the intervals 7 specified in the operator's program?

Yes = .5 No = 0SLR Notes:

# Gas Transmission Pipeline Integrity Management (49 CFR Part 192 Subpart O)

Has the state verified that all operators with transmission pipelines have either adopted an integrity management program (IMP), or have properly determined that one is not required?

SLR Notes:

9 Has the state verified that in determining whether a plan is required, the operator correctly calculated the potential impact radii and properly applied the definition of a high consequence area? Yes = .5 No = 0





.5