



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

1200 New Jersey Avenue SE  
Washington DC 20590

## 2009 Natural Gas State Program Evaluation

for

PENNSYLVANIA PUBLIC UTILITY COMMISSION

### Document Legend

#### PART:

- 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:** Pennsylvania

**Agency Status:**

**Date of Visit:** 09/14/2010 - 09/15/2010

**Agency Representative:** Paul Metro

**PHMSA Representative:** Jim Anderson

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

**Name/Title:** James H. Cawley, Chairman

**Agency:** Pennsylvania Public Utility Commission

**Address:** P.O. Box3265

**City/State/Zip:** Harrisburg, Pennsylvania 17105-3265

**Rating:**

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

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**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 than 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.

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**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**

**PARTS**

**Possible Points    Points Scored**

A	General Program Qualifications	26	24
B	Inspections and Compliance - Procedures/Records/Performance	25	24
C	Interstate Agent States	0	0
D	Incident Investigations	7	7
E	Damage Prevention Initiatives	9	9
F	Field Inspection	12	12
G	PHMSA Initiatives - Strategic Plan	10	9.5
H	Miscellaneous	3	3
I	Program Initiatives	9	9

**TOTALS**

**101                      97.5**

**State Rating .....**

**96.5**

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## PART A - General Program Qualifications

Points(MAX) Score

- |          |  |                                     |   |
|----------|--|-------------------------------------|---|
| <b>1</b> | Did the state submit complete and accurate information on the attachments to its most current 60105(a) Certification/60106 (a) Agreement? (NOTE: PHMSA Representative to verify certification/agreement attachments by reviewing appropriate state documentation. Score a deficiency in any one area as "needs improvement". Attachment numbers appear in parenthesis) Previous Question A.1, Items a-h worth 1 point each<br>Yes = 8 No = 0 Needs Minor Improvement = 3-7 Needs Major Improvement = 2 | 8                                   | 6 |
| a.       | State Jurisdiction and agent status over gas facilities (1)  | <input checked="" type="checkbox"/> |   |
| b.       | Total state inspection activity (2)  | <input checked="" type="checkbox"/> |   |
| c.       | Gas facilities subject to state safety jurisdiction (3)  | <input type="checkbox"/>            |   |
| d.       | Gas pipeline incidents (4)   | <input checked="" type="checkbox"/> |   |
| e.       | State compliance actions (5)   | <input type="checkbox"/>            |   |
| f.       | State record maintenance and reporting (6)   | <input checked="" type="checkbox"/> |   |
| g.       | State employees directly involved in the gas pipeline safety program (7)   | <input checked="" type="checkbox"/> |   |
| h.       | State compliance with Federal requirements (8)   | <input checked="" type="checkbox"/> |   |

### SLR Notes:

Totals on Attachment 1 and Attachment 3 did not match and totals on Attachment 5 were not calculated properly.

- |          |   |   |   |
|----------|---|---|---|
| <b>2</b> | Did the state have an adequate mechanism to receive operator reporting of incidents to ensure state compliance with 60105(a) Certification/60106(a) Agreement requirements (fatality, injury requiring hospitalization, property damage exceeding \$50,000 - Mechanism should include receiving "after hours" reports)? (Chapter 6) Previous Question A.2<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

### SLR Notes:

Operator procedures have all inspectors contact information.

- |          |   |   |   |
|----------|---|---|---|
| <b>3</b> | Has the state held a pipeline safety TQ seminar(s) in the last 3 years? (NOTE: Indicate date of last seminar or if state requested seminar, but T&Q could not provide, indicate date of state request for seminar. Seminars must be held at least once every 3 calendar years.) (Chapter 8.5) Previous Question A.4<br>Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

### SLR Notes:

Last TQ Seminar was in 2009.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Were pipeline safety program files well-organized and accessible?(NOTE: This also includes electronic files) (Chapter 5) Previous Question A.5<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

### SLR Notes:

Yes.

- |          |   |   |   |
|----------|---|---|---|
| <b>5</b> | Did state records and discussions with the state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? (Chapter 4.1, Chapter 8.1) Previous Question A.6<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

### SLR Notes:

Yes. Paul Metro is the current NAPSRS Vice-Chair and works closely with PHMSA.

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Did the state respond in writing within 60 days to the requested items in the Chairman's letter following the Region's last program evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

### SLR Notes:

Yes.

- |          |  |   |   |
|----------|--|---|---|
| <b>7</b> | What actions, if necessary, did the State initiate as a result of issues raised in the Chairperson's letter from the previous year? Did actions correct or address deficiencies from previous year's evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8/A.9<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes.

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## Personnel and Qualifications

- |          |  |   |   |
|----------|--|---|---|
| <b>8</b> | 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<br>Yes = 3 No = 0 | 3 | 3 |
|----------|--|---|---|

SLR Notes:

Yes.

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>9</b> | Brief Description of Non-TQ training Activities:<br>Info Only = No Points<br><br>For State Personnel:<br><br><br>For Operators:<br><br><br>For Non-Operator Entities/Parties, Information Dissemination, Public Meetings: | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

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- |           |   |   |   |
|-----------|---|---|---|
| <b>10</b> | 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<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|---|---|---|

SLR Notes:

Yes.

- 
- |           |  |   |   |
|-----------|--|---|---|
| <b>11</b> | 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<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|

SLR Notes:

Yes.

- 
- |           |  |   |   |
|-----------|--|---|---|
| <b>12</b> | 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<br>Yes = 5 No = 0<br><br>A. Total Inspection Person Days (Attachment 2):<br>1041.00<br><br>B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):<br>220 X 7.60 = 1672.00<br><br>Ratio: A / B<br>1041.00 / 1672.00 = 0.62<br><br>If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0<br>Points = 5 | 5 | 5 |
|-----------|--|---|---|

SLR Notes:

Yes.

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

SLR Notes:

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**14** Part-A General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

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Total points scored for this section: 24  
Total possible points for this section: 26



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

Points(MAX) Score

### Inspection Procedures

- 1** Does the State have a written inspection plan to complete the following? (all types of operators including LNG) 6.5 6.5  
(Chapter 5.1) Previous Question B.1 + Chapter 5 Changes + Incorporate LNG  
Yes = 6.5 No = 0 Needs Improvement = 50% Deduction
- |   |   |                                      |                          |   |
|---|---|--------------------------------------|--------------------------|---|
| a | Standard Inspections (Including LNG) (Max points = 2) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b | IMP Inspections (Including DIMP) (Max points = .5)    | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c | OQ Inspections (Max points = .5)                      | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d | Damage Prevention (Max points = .5)                   | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e | On-Site Operator Training (Max points = .5)           | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f | Construction Inspections (Max points = .5)            | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| g | Incident/Accident Investigations (Max points = 1)     | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| h | Compliance Follow-up (Max points = 1)                 | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

SLR Notes:

Yes.

- 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 2 1  
Yes = 2 No = 0 Needs Improvement = 50% Deduction
- |   |  |                                      |                                     |   |
|---|--|--------------------------------------|-------------------------------------|---|
| a | Length of time since last inspection   | Yes <input checked="" type="radio"/> | No <input type="radio"/>            | Needs Improvement <input type="radio"/> |
| b | History of Operator/unit and/or location (including leakage , incident and compliance history) | Yes <input checked="" type="radio"/> | No <input type="radio"/>            | Needs Improvement <input type="radio"/> |
| c | Type of activity being undertaken by operator (construction etc)                               | Yes <input type="radio"/>            | No <input checked="" type="radio"/> | Needs Improvement <input type="radio"/> |
| d | For large operators, rotation of locations inspected   | Yes <input type="radio"/>            | No <input checked="" type="radio"/> | Needs Improvement <input type="radio"/> |

SLR Notes:

No written plan but are looking at length of time since last inspection and history of operator.

### Inspection 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 2 2  
Yes = 2 No = 0

SLR Notes:

Inspect all type of operators but no written procedures.

- 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 1 1  
Yes = 1 No = 0

SLR Notes:

Yes.

- 5** Did state complete all applicable portions of inspection forms? (Chapter 5.1 (3)) Previous Question B.5 1 1  
Yes = 1 No = 0

SLR Notes:

Yes, through an accumulation of inspections.

- 6** Did the state initiate appropriate follow-up actions to Safety Related Condition Reports? (Chapter 6.3) Previous Question B.6 .5 .5  
Yes = .5 No = 0

SLR Notes:

Yes.

<b>7</b>	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 Yes = .5 No = 0	.5	.5
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SLR Notes:

Yes.

<b>8</b>	Did the state review 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) (NTSB) Previous Question B.8 Yes = .5 No = 0	.5	.5
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SLR Notes:

Yes. Sends data request to operators.

<b>9</b>	Did the state review 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? (NTSB) Previous Question B.9 Yes = .5 No = 0	.5	.5
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SLR Notes:

Yes. Sends data request to operators.

<b>10</b>	Did the state review 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? (NTSB) Previous Question B.10 Yes = 1 No = 0	1	1
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SLR Notes:

Yes. Sends data request to operators.

## Compliance - 60105(a) States

<b>11</b>	Did the state adequately document sufficient information on probable violations? (Chapter 5.2) Previous Question B.14 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

Yes.

<b>12</b>	Does the state have written procedures to identify the steps to be taken from the discovery to the resolution of a probable violation as specified in the "Guidelines for State Participating in the Pipeline Safety Program"? (Chapter 5.1) Previous Question D(1).1 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

Yes. PA PUC has an inspector's handbook.

<b>13</b>	Does the state have written procedures to notify an operator when a noncompliance is identified as specified in the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(4)) Previous Question D(1).2 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

Yes.

<b>14</b>	Does the state have a written procedure for routinely reviewing the progress of compliance actions to prevent delays or breakdowns of the enforcement process, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(5)) Previous Question D(1).3 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

Yes.

<b>15</b>	Has the State issued compliance actions for all probable violations discovered? (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(1).4 Yes = 1 No = 0	1	1
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SLR Notes:

Yes.

<b>16</b>	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	1
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SLR Notes:

Yes.

<b>17</b>	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 No = 0 Yes = 1	1	1
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SLR Notes:

Yes.

<b>18</b>	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	1
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SLR Notes:

Yes.

<b>19</b>	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	.5
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SLR Notes:

Yes.

<b>20</b>	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	1
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SLR Notes:

Yes.

## Compliance - 60106(a) States

<b>21</b>	Did the state use the current federal inspection form(s)? Previous Question D(2).1 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

<b>22</b>	Are results adequately documented demonstrating inspection units were reviewed in accordance with state inspection plan? Previous Question D(2).2 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

<b>23</b>	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(2).3 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:



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24	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(2).4 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

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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	NA
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SLR Notes:

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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	NA
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SLR Notes:

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27	Part B: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only
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SLR Notes:

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Total points scored for this section: 24  
Total possible points for this section: 25



## PART C - Interstate Agent States

Points(MAX) Score

- |   |   |   |    |
|---|---|---|----|
| 1 | Did the state use the current federal inspection form(s)? Previous Question D(3).1<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|---|---|---|----|

SLR Notes:

- |   |  |   |    |
|---|--|---|----|
| 2 | Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? Previous Question D(3).2<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|---|--|---|----|

SLR Notes:

- |   |  |   |    |
|---|--|---|----|
| 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<br>Yes = 1 No = 0 | 1 | NA |
|---|--|---|----|

SLR Notes:

- |   |   |   |    |
|---|---|---|----|
| 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<br>Yes = 1 No = 0 | 1 | NA |
|---|---|---|----|

SLR Notes:

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

SLR Notes:

- |   |  |   |    |
|---|--|---|----|
| 6 | Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(3).6<br>Yes = 1 No = 0 | 1 | NA |
|---|--|---|----|

SLR Notes:

- |   |  |   |    |
|---|--|---|----|
| 7 | Did the state initially submit documentation to support compliance action by PHMSA on probable violations? Previous Question D(3).7<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|---|--|---|----|

SLR Notes:

- |   |   |           |           |
|---|---|-----------|-----------|
| 8 | Part C: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|---|---|-----------|-----------|

SLR Notes:

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

## PART D - Incident Investigations

Points(MAX) Score

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

SLR Notes:

Yes.

- |          |   |    |    |
|----------|---|----|----|
| <b>2</b> | 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<br>Yes = .5 No = 0 | .5 | .5 |
|----------|---|----|----|

SLR Notes:

Yes.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | Did the state keep adequate records of incident notifications received? Previous Question E.3<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | 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<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes.

- |          |   |                                      |  |
|----------|---|--------------------------------------|--|
| <b>5</b> | Were investigations thorough and conclusions and recommendations documented in an acceptable manner? Previous Question E.5, comprehensive question worth 2 points total<br>Yes = 2 No = 0 Needs Improvement = 1 | 2                                    | 2  |
| a.       | Observations and Document Review  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b.       | Contributing Factors  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| c.       | Recommendations to prevent recurrences where appropriate  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

SLR Notes:

Yes.

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Did the state initiate enforcement action for violations found during any incident investigation(s)? Previous Question E.6 Variation<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

Yes. All had formal complaints.

- |          |  |    |     |
|----------|--|----|-----|
| <b>7</b> | 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<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes.

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>8</b> | Part D: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

Total points scored for this section: 7  
Total possible points for this section: 7



## PART E - Damage Prevention Initiatives

Points(MAX) Score

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

### SLR Notes:

Yes. PA One Call Law requires operators and contractors to use Horizontal Directional Drilling Good Practices.

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | 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<br>Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

### SLR Notes:

Yes. PA PUC has a Damage Facility Report Form. Also large LDCs have been fined for not following their procedures.

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

### SLR Notes:

Yes. Program Manager made presentation at TQ seminar about this.

- |          |   |   |   |
|----------|---|---|---|
| <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? New 2008<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

### SLR Notes:

Yes. PUC and Dept. of Labor both collect data and evaluates trends.

- |          |  |   |   |
|----------|--|---|---|
| <b>5</b> | 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?<br>Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

### SLR Notes:

Yes. It's in the Damage Facility Report Form and Damage Prevention Study.

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>6</b> | Part E: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

### SLR Notes:

Total points scored for this section: 9  
Total possible points for this section: 9

## PART F - Field Inspection

Points(MAX) Score

- |          |  |                       |
|----------|--|-----------------------|
| <b>1</b> | Operator, Inspector, Location, Date and PHMSA Representative<br><br>Info Only = No Points<br><br>Name of Operator Inspected:<br>Philadelphia Gas Works<br><br>Name of State Inspector(s) Observed:<br>Mike Nygen, Gas Safety Inspector<br><br>Location of Inspection:<br>Philadelphia, PA 19122<br><br>Date of Inspection:<br>September 1-2, 2010<br><br>Name of PHMSA Representative:<br>Glynn Blanton, US DOT PHMSA State Programs | Info Only   Info Only |
|----------|--|-----------------------|

### SLR Notes:

This inspection was performed on Philadelphia Gas Works (PGW) distribution system located in Philadelphia, PA on September 1-2, 2010. Mike Nguyen, Gas Safety Inspector and Paul Metro, Chief Engineer Gas Safety Division from the PA PUC were present. A pre-inspection meeting was conducted in PGW board room located at their office at 800 West Montgomery Avenue with the following representatives present: Mr. Paul A. Mondimore, Vice President Field Operations, Mr. John Jolly, Manager Distribution Department, Mr. Jeffery L. Meyers- Director, Engineering, Design and Construction and Ms. Colleen C. Murray, Regulatory Compliance Analysis I. An overview of PGW operations, construction and damage prevention programs were presented by Mr. Mondimore. It was decided a construction inspection would be performed on PGW distribution system in the Philadelphia area.

- |          |   |                          |
|----------|---|--------------------------|
| <b>2</b> | Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? New 2008<br>Yes = 1 No = 0 | 1                      1 |
|----------|---|--------------------------|

### SLR Notes:

Mr. Paul A. Mondimore, Vice President Field Operations, Philadelphia Gas Works was notified about the scheduled inspection two weeks prior to the scheduled meeting by Paul Metro, Chief Engineer with the PA PUC.

- |          |  |                          |
|----------|--|--------------------------|
| <b>3</b> | 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<br>Yes = 2 No = 0 | 2                      2 |
|----------|--|--------------------------|

### SLR Notes:

Yes, Michael Nyghen, PA PUC Inspector, used PA PUC Construction Inspection for PE Plastic Pipelines form. The form contained several questions and blocks to be checked as he reviewed the construction work being performed.

- |          |  |                          |
|----------|--|--------------------------|
| <b>4</b> | Did the inspector thoroughly document results of the inspection? Previous Question F.3<br>Yes = 2 No = 0 | 2                      2 |
|----------|--|--------------------------|

### SLR Notes:

Yes, the inspector documented the results of the items observed, reviewed and checked during the two day construction inspection period on the PA PUC form.

- |          |   |                          |
|----------|---|--------------------------|
| <b>5</b> | 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<br>Yes = 1 No = 0 | 1                      1 |
|----------|---|--------------------------|

### SLR Notes:

On September 1, 2010, observed a construction crew completing the tie-in and activation of natural gas on several service lines located along Champlost Avenue and 19th Street in the Northern section of Philadelphia. The inspector found several areas of concern pertaining to the joining of the plastic main and service lines. Two Saddle T's located in front of 1855 Champlost Avenue appeared to have been installed too close to each other to allow an emergency squeeze off process to be performed and the plastic sleeves over the service lines were not installed. Additionally, a large scratch approximately three inches in length was found on the two-inch plastic main at 1832 Champlost Avenue. The PA PUC inspector informed the operator of these areas of concern. On September 2, 2010, observed at the intersection of Camac Street and Ogden Street, PGW crews removing a 6" cast iron main and installing Driscoplex 6" PE pipe. The pipeline was pressure tested and connected with mechanical fittings to the existing cast iron main located along Ogden Street. Observed inspector checking the depth of the pipeline, mechanical couplings, operator qualification documents, tapping equipment and monitoring of pressure testing on the new 6 inch line installed. The operator had all necessary equipment available to perform the required tasks.

- |          |  |                       |
|----------|--|-----------------------|
| <b>6</b> | 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<br>Info Only = No Points | Info Only   Info Only |
|----------|--|-----------------------|

### SLR Notes:

A construction inspection was performed at two different locations over a two day period. At the first location PGW construction crews were completing the

tie-in and activation of natural gas service to service lines located along Champlost Avenue and 19th Street in Philadelphia. At the second location PGW construction crews were removing a 6" cast iron main and installing Driscopex 6" PE pipe at the intersection of Camac Street and Ogden Street. The pipeline was pressure tested and connected with mechanical fittings to the existing cast iron main located along Ogden Street.

- |          |  |                                     |   |
|----------|--|-------------------------------------|---|
| <b>7</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2                                   | 2 |
|          | a. Procedures  | <input checked="" type="checkbox"/> |   |
|          | b. Records   | <input checked="" type="checkbox"/> |   |
|          | c. Field Activities/Facilities   | <input checked="" type="checkbox"/> |   |
|          | d. Other (Please Comment)  | <input type="checkbox"/>            |   |

**SLR Notes:**

Yes, Michael Nguyen, PA PUC Inspector, reviewed the operator's jointing procedures, construction records and equipment requirements to complete the required task during the inspection.

- |          |   |   |   |
|----------|---|---|---|
| <b>8</b> | Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Liaison will document reasons if unacceptable) Previous Question F.8<br>Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

**SLR Notes:**

Yes, Michael Nguyen, PA PUC Inspector, has over twenty-seven years of experience in performing pipeline safety inspections. He has completed all the T&Q courses.

- |          |  |   |   |
|----------|--|---|---|
| <b>9</b> | Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) Previous Question F.10<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

**SLR Notes:**

Yes, an exit interview was conducted on the last day of the inspection at PGW's offices located on Montgomery Avenue. In attendance at the meeting were the following individuals from PGW: Mr. John T. Dunn, Supervisor and Ms. Colleen Murray, Regulatory Compliance Analysis. Mr. Michael Nguyen, PA PUC Inspector, reviewed the items of concern he found and explained in detail his findings. He mentioned that an official inspection report will be issued in thirty days to them after it has been removed by Mr. Paul Metro, Chief Engineer, PA PUC.

- |           |  |   |   |
|-----------|--|---|---|
| <b>10</b> | During the exit interview, did the inspector identify probable violations found during the inspections? Previous Question F.11<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|

**SLR Notes:**

Yes, Michael Nguyen, PA PUC Inspector, identified concerns and probable violations found during the construction inspection and explained in detail to the operator his rationale about the findings.

- |           |   |           |           |
|-----------|---|-----------|-----------|
| <b>11</b> | What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)<br>Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

**SLR Notes:**

On September 1, 2010, observed PGW construction crew completing the tie-in and re-activation of natural gas service to six service lines located along Champlost Avenue and 19th Street in Philadelphia. The inspector found several areas of concerns pertaining to the joining of the plastic main and service lines. Two Saddle T's located in front of 1855 Champlost Avenue appeared to have been installed too close to each other to allow an emergency squeeze off process to be performed and the plastic sleeves over the service lines were not installed. Additionally, a large scratch approximately three inches in length was found on the two-inch plastic main at 1832 Champlost Avenue. The PA PUC inspector informed the operator of these areas of concern. On September 2, 2010, observed at the intersection of Camac Street and Ogden Street, PGW crews removing a 6" cast iron main and installing Driscopex 6" PE pipe. The pipeline was pressure tested and connected with mechanical fittings to the existing cast iron main located along Ogden Street. Observed inspector checking the depth of the pipeline, mechanical couplings, operator qualification documents, tapping equipment and monitoring of pressure testing on the new 6 inch PE pipeline being installed. Observed inspector checking for general or localized graphitization on the old 6 inch cast iron pipeline that was removed.

- |           |  |           |           |
|-----------|--|-----------|-----------|
| <b>12</b> | Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)<br>Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

**SLR Notes:**

There were no best practices identified by the operator or inspector during this field or office observation.

- |           |  |                          |           |
|-----------|--|--------------------------|-----------|
| <b>13</b> | Field Observation Areas Observed (check all that apply)<br>Info Only = No Points | Info Only                | Info Only |
|           | a. Abandonment   | <input type="checkbox"/> |           |
|           | b. Abnormal Operations   | <input type="checkbox"/> |           |

c.	Break-Out Tanks	<input type="checkbox"/>
d.	Compressor or Pump Stations	<input type="checkbox"/>
e.	Change in Class Location	<input type="checkbox"/>
f.	Casings	<input type="checkbox"/>
g.	Cathodic Protection	<input type="checkbox"/>
h.	Cast-iron Replacement	<input checked="" type="checkbox"/>
i.	Damage Prevention	<input type="checkbox"/>
j.	Deactivation	<input type="checkbox"/>
k.	Emergency Procedures	<input type="checkbox"/>
l.	Inspection of Right-of-Way	<input type="checkbox"/>
m.	Line Markers	<input type="checkbox"/>
n.	Liaison with Public Officials	<input type="checkbox"/>
o.	Leak Surveys	<input type="checkbox"/>
p.	MOP	<input type="checkbox"/>
q.	MAOP	<input checked="" type="checkbox"/>
r.	Moving Pipe	<input type="checkbox"/>
s.	New Construction	<input checked="" type="checkbox"/>
t.	Navigable Waterway Crossings	<input type="checkbox"/>
u.	Odorization	<input type="checkbox"/>
v.	Overpressure Safety Devices	<input type="checkbox"/>
w.	Plastic Pipe Installation	<input checked="" type="checkbox"/>
x.	Public Education	<input type="checkbox"/>
y.	Purging	<input checked="" type="checkbox"/>
z.	Prevention of Accidental Ignition	<input type="checkbox"/>
A.	Repairs	<input type="checkbox"/>
B.	Signs	<input type="checkbox"/>
C.	Tapping	<input checked="" type="checkbox"/>
D.	Valve Maintenance	<input type="checkbox"/>
E.	Vault Maintenance	<input type="checkbox"/>
F.	Welding	<input type="checkbox"/>
G.	OQ - Operator Qualification	<input checked="" type="checkbox"/>
H.	Compliance Follow-up	<input type="checkbox"/>
I.	Atmospheric Corrosion	<input type="checkbox"/>
J.	Other	<input type="checkbox"/>

#### SLR Notes:

During the construction inspection at two different locations in the Philadelphia area Michael Nguyen, PA PUC Inspector, observed and checked all records and procedures on the items listed above.

#### 14 Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

#### SLR Notes:

Michael Nguyen performed a thorough construction inspection of operator's installation of PE services and mains and removal of the 6 inch cast iron pipeline in two locations in Philadelphia. The inspection was conducted in a professional manner being respectful of the operator's comments and crew members working conditions. Michael exhibited a good understanding of the natural gas pipeline safety regulations.

Total points scored for this section: 12  
Total possible points for this section: 12



## PART G - PHMSA Initiatives - Strategic Plan

Points(MAX) Score

### Risk base Inspections - Targeting High Risk Areas

1 Does state have process to identify high risk inspection units? 1.5 1.5

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:

Yes.

2 Are inspection units broken down appropriately? (see definitions in Guidelines) .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes.

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

Info Only = No Points

SLR Notes:

4 Does state inspection process target high risk areas? .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes.

### Use of Data to Help Drive Program Priority and Inspections

5 Does state use data to analyze effectiveness of damage prevention efforts in the state? (DIRT or other data, etc) .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes. It collects damage prevention statistics for evaluation.

6 Has state reviewed data on Operator Annual reports for accuracy? .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes. It is in the Gas Safety Division's Annual Report DOT study.

7 Has state analyzed annual report data for trends and operator issues? .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes. In the DOT Annual Report Study.

8 Has state reviewed data on Incident/Accident reports for accuracy? .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes. Operators are contacted at the end of each year to ensure final reports are complete.

<b>9</b>	Does state do evaluation of effectiveness of program based on data? (i.e. performance measures, trends, etc.)	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes. The Gas Division uses several years of data to evaluate performance measures.

<b>10</b>	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	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes.

<b>11</b>	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	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes.

<b>12</b>	Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17	.5	0
	Yes = .5 No = 0		

SLR Notes:

No.

<b>13</b>	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	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes. In cast iron and plastic pipe reports.

<b>14</b>	Has state confirmed transmission operators have submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submission?	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes.

## Accident/Incident Investigation Learning and Sharing Lessons Learned

<b>15</b>	Has state shared lessons learned from incidents/accidents? (i.e. NAPSIR meetings and communications)	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes. Through NAPSIR meetings.

<b>16</b>	Does the State support data gathering efforts concerning accidents? (Frequency/Consequence/etc)	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes.

<b>17</b>	Does state have incident/accident criteria for conducting root cause analysis?	Info Only	Info Only
	Info Only = No Points		

SLR Notes:

<b>18</b>	Does state conduct root cause analysis on incidents/accidents in state?	Info Only	Info Only
	Info Only = No Points		

SLR Notes:

---

<b>19</b>	Has state participated on root cause analysis training? (can also be on wait list)	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Inspectors attended classes in July '09 and '10.

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## Transparency - Communication with Stakeholders

<b>20</b>	Other than pipeline safety seminar does State communicate with stakeholders? (Communicate program data, pub awareness, etc.)	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Speaking engagements with stakeholders.

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<b>21</b>	Does state share enforcement data with public? (Website, newsletters, docket access, etc.)	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

PUC website.

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

SLR Notes:

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Total points scored for this section: 9.5  
Total possible points for this section: 10



## PART H - Miscellaneous

Points(MAX) Score

- |          |   |    |     |
|----------|---|----|-----|
| <b>1</b> | What were the major accomplishments for the year being evaluated? (Describe the accomplishments, NAPSR Activities and Participation, etc.)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Paul Metro is current NAPSR Vice Chair, NAPSR Legislative Committee chair, and Chair of NARUC Pipeline Safety Sub-Committee.

- |          |  |    |     |
|----------|--|----|-----|
| <b>2</b> | 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.)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Removal of customer owned service lines, eliminate cast iron, increase state fines to meet federal level, obtain jurisdiction over natural gas cooperatives and landfill pipelines.

- |          |  |    |     |
|----------|--|----|-----|
| <b>3</b> | Any Risk Reduction Accomplishments/Projects? (i.e. Cast iron replacement projects, bare steel, third-party damage reductions, etc.)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes. DISC - Distribution Improvement Charge

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Did the state participate in/respond to surveys or information requests from NAPSR or PHMSA?<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes.

- |          |   |    |     |
|----------|---|----|-----|
| <b>5</b> | Sharing Best Practices with Other States - (General Program)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Yes. Has discussion with surrounding states on safety issues.

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>6</b> | Part H: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

Total points scored for this section: 3  
Total possible points for this section: 3

## PART I - Program Initiatives

Points(MAX) Score

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

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Has the state verified that operators have drug and alcohol testing programs?<br><small>Yes = 1 No = 0</small> | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes. Have conducted inspections.

- |          |   |    |     |
|----------|---|----|-----|
| <b>2</b> | Is the state verifying that operators are conducting the drug and alcohol tests required by the operators program (random, post-incident, etc.)<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Yes.

- |          |  |    |     |
|----------|--|----|-----|
| <b>3</b> | Is the state verifying that any positive tests are responded to in accordance with the operator's program?<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes.

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

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Has the state verified that operators have a written qualification program?<br><small>Yes = 1 No = 0</small> | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes.

- |          |   |    |     |
|----------|---|----|-----|
| <b>5</b> | Has the state reviewed operator qualification programs for compliance with PHMSA rules and protocols?<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Yes.

- |          |   |    |     |
|----------|---|----|-----|
| <b>6</b> | Is the state verifying that persons who perform covered tasks for the operator are qualified in accordance with the operator's program?<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Yes.

- |          |   |    |     |
|----------|---|----|-----|
| <b>7</b> | Is the state verifying that persons who perform covered task for the operator are requalified at the intervals specified in the operator's program?<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Yes.

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

- |          |   |   |   |
|----------|---|---|---|
| <b>8</b> | 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?<br><small>Yes = 1 No = 0</small> | 1 | 1 |
|----------|---|---|---|

SLR Notes:

Yes.

- |          |   |    |     |
|----------|---|----|-----|
| <b>9</b> | 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?<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Yes.

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<b>10</b>	Has the state reviewed operator IMPs for compliance with Subpart O? (In accordance with State Inspection plan) Yes = .5 No = 0	.5	0.5
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SLR Notes:

Yes.

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<b>11</b>	Is the state monitoring operator progress on the inspections, tests and remedial actions required by the operator's IMP, including that they are being done in the manner and schedule called for in its IMP? Yes = .5 No = 0	.5	0.5
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SLR Notes:

Yes.

---

<b>12</b>	Is the state verifying that operators are periodically examining their transmission line routes for the appearance of new HCAs? Yes = .5 No = 0	.5	0.5
-----------	--	----	-----

SLR Notes:

Yes.

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### Public Awareness (49 CFR Section 192.616)

<b>13</b>	Has the state verified that each operator has developed a continuing public awareness program? (due date was 6/20/06 for most operators, 6/20/07 for certain very small operators, 6/13/08 for master meters) Yes = .5 No = 0	.5	0.5
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SLR Notes:

Yes.

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<b>14</b>	Has the state reviewed the content of these programs for compliance with 192.616 (by participating in the Clearinghouse or by other means)? Yes = .5 No = 0	.5	0.5
-----------	--	----	-----

SLR Notes:

Reviewed in house.

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<b>15</b>	Is the state verifying that operators are conducting the public awareness activities called for in its program? Yes = .5 No = 0	.5	0.5
-----------	--	----	-----

SLR Notes:

Yes.

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<b>16</b>	Is the state verifying that operators have evaluated their Public Awareness programs for effectiveness as described in RP1162? Info Only = No Points	Info Only	Info Only
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SLR Notes:

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<b>17</b>	Part I: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only
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SLR Notes:

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Total points scored for this section: 9  
Total possible points for this section: 9