



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

1200 New Jersey Avenue SE
Washington DC 20590

2014 Gas State Program Evaluation

for

CT Dept of Energy and Env Protection

Document Legend

PART:

- O -- Representative Date and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- Program Performance
- D -- Compliance Activities
- E -- Incident Investigations
- F -- Damage Prevention
- G -- Field Inspections
- H -- Interstate Agent State (If Applicable)
- I -- 60106 Agreement State (If Applicable)



2014 Gas State Program Evaluation -- CY 2014

Gas

State Agency: Connecticut

Agency Status:

Date of Visit: 10/26/2015 - 10/30/2015

Agency Representative: Karl Baker, Program Manager, Pipeline Safety Unit

Rating:

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

PHMSA Representative: Patrick Gaume

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

Name/Title: Arthur House, Chairman

Agency: Public Utilities Regulatory Authority

Address: Ten Franklin Square

City/State/Zip: New Britain, Connecticut 06051

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 2014 (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 progress report attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART G):

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 G, the PHMSA representative should include a written summary which thoroughly documents the inspection.

Scoring Summary

PARTS

A	Progress Report and Program Documentation Review
B	Program Inspection Procedures
C	Program Performance
D	Compliance Activities
E	Incident Investigations
F	Damage Prevention
G	Field Inspections
H	Interstate Agent State (If Applicable)
I	60106 Agreement State (If Applicable)

Possible Points Points Scored

10	10
13	13
42	42
15	15
7	7
8	8
12	12
6	6
0	0

TOTALS

113 113

State Rating

100.0

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- | | | | |
|---|---|---|---|
| 1 | Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

A1. Yes. All data reviewed was accurate and consistent with Attachments 3 & 8.

- | | | | |
|---|--|---|---|
| 2 | Review of Inspection Days for accuracy - Progress Report Attachment 2
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

A2. Yes, Inspection days were reported accurately and were in agreement with the Inspection Tracking spreadsheet & the Inspection Records database. 462 field days.

- | | | | |
|---|--|---|---|
| 3 | Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

A3. Yes, is consistent with Attachment 1 and the Inspection Records database.

- | | | | |
|---|--|---|---|
| 4 | Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

A4. Yes, 0 incidents were reported and 0 incidents are in Pipeline Data Mart for 2014.

- | | | | |
|---|--|---|---|
| 5 | Accuracy verification of Compliance Activities - Progress Report Attachment 5
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

A5. Yes. Information listed was accurate.

- | | | | |
|---|---|---|---|
| 6 | Were pipeline program files well-organized and accessible? - Progress Report Attachment 6
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

A6. Yes. Files kept in pipeline safety section. Some kept electronically and some kept in hard copy. Official files are now electronic with the paper files being kept in the office.

- | | | | |
|---|--|---|---|
| 7 | Was employee listing and completed training accurate and complete? - Progress Report Attachment 7
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

A7. Yes, the TQ imported records are in agreement with the CT Training database. 4.35 inspector years.

- | | | | |
|---|---|---|---|
| 8 | Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

A8. Yes, CT pipeline safety rules automatically adopt federal regulations.

- 9 List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A9. Yes. Further accelerate cast-iron and bare steel replacement across all operators. Achieve 100% score on PHMSA evaluation of our state program. Reduce excavation damages.

Working with last operator to further accelerate cast-iron and bare steel replacement. Received 100% score for 2013 PHMSA program audit and believe that we have performed successfully again in 2014 to receive another 100% score. Continued with new streamlined civil penalty process for excavation damages. Passed new excavation damage legislation and are currently working on new regulations. Successfully added a new incremental inspector in March 2014.

Staff served on Grant Allocation/Strategic Planning Committee, NAPSR Website Development task group (Webmaster), CGA Data Committee, EFV task group, APGA committee to develop LP Small Operators Manual.

Program initiatives:

1. Aggressively pursuing accelerated cast iron/bare steel pipe replacement
2. Minimizing backlog of Class 2 leaks
3. Converting inspection forms and reference material to electronic format to decrease time spent on administrative overhead and to enhance the availability of information in the field through the use of laptops for all inspections
4. Damage prevention ? push to reduce numbers of damages through targeted advertising and educational sessions and streamlined enforcement process
5. Damage prevention ? Initiative to reduce the number of markout error damages
6. Engaged in locating jurisdictional LP Gas operators and facilities

10 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

A10. The Commission's continuing support for Pipeline Safety & the Pipeline Safety Unit is noted. The Unit is fully staffed to 7 FTE, with the 7th FTE being added in March, 2014.

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



PART B - Program Inspection Procedures

Points(MAX) Score

- | | | | |
|---|--|---|---|
| 1 | Standard Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 2 | 2 |
|---|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

B1. Yes. The Administrative Procedures define what a Standard Inspection consists of in Section 7, the inspection interval times and ranking criteria are listed in Section 10, and Conducting of Inspections in Section 11.

- | | | | |
|---|--|---|---|
| 2 | IMP and DIMP Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

B2. Yes. The Administrative Procedures define what a Standard Inspection consists of in Section 7, the inspection interval times and ranking criteria are listed in Section 10, and Conducting of Inspections in Section 11.

- | | | | |
|---|--|---|---|
| 3 | OQ Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

B3. Yes. The Administrative Procedures define what a Standard Inspection consists of in Section 7, the inspection interval times and ranking criteria are listed in Section 10, and Conducting of Inspections in Section 11.

- | | | | |
|---|---|---|---|
| 4 | Damage Prevention Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|---|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

B4. Yes. The Administrative Procedures define what a Standard Inspection consists of in Section 7, the inspection interval times and ranking criteria are listed in Section 10, and Conducting of Inspections in Section 11. Normally a Damage Prevention inspection is included in a Standard Inspection.

- | | | | |
|---|--|---|---|
| 5 | Any operator training conducted should be outlined and appropriately documented as needed. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

B5. Yes. The Administrative Procedures define what a Standard Inspection consists of in Section 7, the inspection interval times and ranking criteria are listed in Section 10, and Conducting of Inspections in Section 11.

- | | | | |
|---|--|---|---|
| 6 | Construction Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

B6. Yes. The Administrative Procedures define what a Standard Inspection consists of in Section 7, the inspection interval times and ranking criteria are listed in Section 10, and Conducting of Inspections in Section 11.

- | | | | |
|----|---|--------------------------------------|--|
| 7 | Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements?
Yes = 6 No = 0 Needs Improvement = 1-5 | 6 | 6 |
| a. | Length of time since last inspection (Within five year interval) | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. | Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| c. | Type of activity being undertaken by operators (i.e. construction) | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| d. | Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc) | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| 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) | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| f. | Are inspection units broken down appropriately? | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

B7. Yes. It is well discussed in The Administrative Procedures in Section 10.

8 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

B8. The procedures were changed in early 2015 to address pre & post inspection activities as required by the IG directives to PHMSA. Propane DIMP was complete by Dec, 2014. It is CT PURA practice to inspect every Unit every year for some type of inspection. A major goal that started in 2010 was to identify jurisdictional LPG operators, and this effort will continue for many years.

Total points scored for this section: 13
Total possible points for this section: 13



PART C - Program Performance

Points(MAX) Score

- 1 Was ratio of Total Inspection person-days to total person days acceptable? (Director of State Programs may modify with just cause) Chapter 4.3 5 5
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):
462.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 4.35 = 957.73

Ratio: A / B
462.00 / 957.73 = 0.48

If Ratio \geq 0.38 Then Points = 5, If Ratio $<$ 0.38 Then Points = 0
Points = 5

Evaluator Notes:

C1. Yes. A=462, B=220X4.35=957, Ratio=462/957=0.48

- 2 Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines Appendix C for requirements) Chapter 4.4 5 5
Yes = 5 No = 0 Needs Improvement = 1-4

- | | | | | |
|----|--|--------------------------------------|--------------------------|---|
| a. | Completion of Required OQ Training before conducting inspection as lead? | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Completion of Required DIMP*/IMP Training before conducting inspection as lead? *Effective Evaluation CY2013 | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Root Cause Training by at least one inspector/program manager | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. | Note any outside training completed | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e. | Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector. | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

C2. Yes. Each senior staff inspector has completed all required core TQ training within the required timeframe. In addition Karl Baker, Bruce Benson and Daniel Nivison have received OQ, DIMP/IMP and Root Cause training. John DePaolo has been in our program since June 2010, has completed all required core courses, and OQ and Root Cause, and is currently scheduled for additional courses as they become available. Daniel Tomasino and Kevin Dowling fairly new hires, but have taken and are scheduled or waitlisted for TQ classes.

- 3 Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

C3. Yes. Karl Baker has been with the program for about 20 years and is very knowledgeable.

- 4 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 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

C4. NA. No response required, 100 score.

- 5 Did State hold PHMSA TQ Seminar in Past 3 Years? Chapter 8.5 2 2
Yes = 2 No = 0

Evaluator Notes:

C5. Yes, Oct 21-22, 2014 in Portsmouth, NH, Oct 23-24, 2013 in Manchester, VT. Oct 10-11, 2012, Mystic, CT; Also Oct, 2011 & May, 2011(propane Seminar).

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|----------|--|---|---|
| 6 | 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 |
|----------|--|---|---|

Evaluator Notes:

C6. Yes. The records are in the Inspection Database.

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|----------|--|---|---|
| 7 | 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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

C7. Yes, CT uses their Forms that include the Current Fed Forms and are supplemented as needed to include NTSB requirements and State Regulations. The Revised Federal Forms are reviewed annually by the Program Manager & his staff and the inspections are updated as needed. Inspections reviewed were 20140925DIMP, 20140617OQ, 20140617COMP, & 20141015SL; DIMP, OQ, Standard & Service Line Constr; 3 had PV.

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|----------|---|---|---|
| 8 | 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) Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

C8. Yes. Question is on federal form, reviewed inspection reports and saw the question answered.

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|----------|--|---|---|
| 9 | 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) Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

C9. Yes. Question is on federal form, reviewed inspection reports and saw the question answered.

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|-----------|---|---|---|
| 10 | 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) Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

C10. Yes. Question is on federal form, reviewed inspection reports and saw the question answered.

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|-----------|--|---|---|
| 11 | 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? Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

C11. Yes. Yes. Performed review during O&M audits. Last audits performed on 3 LDCs and Norwich Public Utilities in 2009, 2011, 2013 and 2015. This is also accomplished during normal review of One-Call damages that are mandatorily reported to the GPSU.

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|-----------|--|---|---|
| 12 | 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:

C12. Yes, CT reviews and analyzes Operator Annual Reports (see PIPEDATA.XLS located in S:\GasPipelineSafetyUnit\GASPIPE\Undergnd Facilities). As part of the investigation of incidents/accidents, PURC reviews incident/accident data for accuracy and ensure that operators correctly file appropriate PHMSA incident forms. PURC evaluates their program

effectiveness and check for operator issues and trends by using leak response time data, class 2 leak backlog data, third-party damage data and cast iron/bare steel replacement program data.

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|-----------|---|---|---|
| 13 | Did state input all applicable OQ, IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|
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Evaluator Notes:

C13. Yes, CT have uploaded all applicable OQ inspection results into the federal database in a timely manner, or used IA, and responded to IMDB notifications.

There are no intrastate transmission lines in Connecticut. All of the interstate IMP inspections that CT was responsible for were performed in IA and therefore do not need to be uploaded to the IMDB.

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|-----------|---|---|----|
| 14 | Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|-----------|---|---|----|
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Evaluator Notes:

C14. NA. There are no intrastate transmission lines in Connecticut.

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| 15 | Is the state verifying operators are conducting drug and alcohol tests as required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|
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Evaluator Notes:

C15. Yes, annual field inspections are performed on all intrastate operators that are required to have the program (see inspection database for dates of inspections). In addition, an annual review of the Drug and Alcohol Testing MIS Data Collection forms is performed. Verification is made that any positive tests are responded to in accordance with the operator's program.

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- | | | | |
|-----------|---|---|---|
| 16 | Is state verifying operators OQ programs are up to date? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals determined in the operators plan. 49 CFR 192 Part N
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|
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Evaluator Notes:

C16. Yes. Both headquarters, protocols 1 through 8, and field, protocol 9, inspections have been performed on all intrastate operators. In addition, on new construction, welding and joining OQ qualifications are being reviewed.

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|-----------|--|---|----|
| 17 | Is state verifying operator's gas transmission integrity management programs (IMP) are up to date? This should include a previous review of IMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart 0
Yes = 2 No = 0 Needs Improvement = 1 | 2 | NA |
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Evaluator Notes:

C17. NA. There are no intrastate transmission lines in Connecticut. CTA has taken part in IMP inspections of interstate operators as part of our interstate annual inspection plan.

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|-----------|--|---|---|
| 18 | Is state verifying operator's gas distribution integrity management Programs (DIMP)? This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart P DIMP ? First round of program inspections should be complete by December 2014
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|
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Evaluator Notes:

C18. Yes. All DIMP audits completed by 12/31/2014 per our Administrative Procedures. New operators are DIMP inspected within 2 years.

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|----|---|---|---|
| 19 | Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. 49 CFR 192.616 (I13-16) PAPEI Effectiveness Inspections should have been completed by December 2013
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----|---|---|---|

Evaluator Notes:

C19. Yes. Performed review during O&M audits. PAPEI audits have been performed on all LDCs and Norwich Public Utilities in 2012. Follow-up PAPEI inspections are scheduled for 2017.

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|----|--|---|---|
| 20 | 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 |
|----|--|---|---|

Evaluator Notes:

C20. Yes. Communications occur with all operators on a regular basis. We attend and communicate information at Call Before You Dig Board of Directors meetings and Public Awareness meetings. We attend and provide training at operator training sessions with local officials including fire departments. We participate in the Northeast Gas Association CT Advisory Group meetings as well. PURA maintains a website that has access to all docketed matters which include all pipeline safety and One-Call enforcement proceedings.

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|----|---|---|----|
| 21 | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----|---|---|----|

Evaluator Notes:

C21. NA. there were no SRCR's in 2014. Practice is to follow up quickly when they happen.

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|----|---|---|---|
| 22 | 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?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----|---|---|---|

Evaluator Notes:

C22. Yes, all data on class 1 and 2 leaks are required to be submitted to the GPSU on a monthly basis. This data is reviewed to determine trends including any plastic pipe issues. Also, during O&M audits, this is reviewed under 192.617 and during DIMP audits.

- | | | | |
|----|--|---|---|
| 23 | Did the state participate in/respond to surveys or information requests from NAPSRS or PHMSA?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----|--|---|---|

Evaluator Notes:

C23. Yes. See PDF versions of emails located in S:\GasPipelineSafetyUnit\GASPIPE\PHMSA\MONITOR\CY2014.

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|----|--|---|---|
| 24 | 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.(New Question for CY2013, no points until CY2015 evaluation conducted in CY2016)
Info Only = No Points | 0 | 0 |
|----|--|---|---|

Evaluator Notes:

C24. There were no waivers or special permits issued.

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|----|---|---|---|
| 25 | Did the state attend the National NAPSRS Board of Directors Meeting in CY being evaluated? (New Question for CY2014, no points first year)
Info Only = No Points | 0 | 0 |
|----|---|---|---|

Evaluator Notes:

C25. Yes. Karl attended the 2014 NAPSRS Mtg, and Karl & Bruce attended the 2015 NAPSRS Mtg.

26 Discussion on State Program Performance Metrics found on Stakeholder Communication 0 0
site. (question will be rolled up and included as part of Question C12 on future
evaluations) <http://primis.phmsa.dot.gov/comm/states.htm>
Info Only = No Points

Evaluator Notes:

C26. Yes. CT has reviewed the data, it is accurate, At this point it is a backup source for the posted information.

27 General Comments: Info OnlyInfo Only
Info Only = No Points

Evaluator Notes:

C27. CT has been successful in hiring and holding engineers in its pipeline safety program. Credit goes to competitive salaries, a beautiful State, and a supportive Commission.

Total points scored for this section: 42
Total possible points for this section: 42



PART D - Compliance Activities

Points(MAX) Score

- | | | | |
|----------|--|--------------------------------------|--|
| 1 | 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 = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| a. | Procedures to notify an operator (company officer) when a noncompliance is identified | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. | Procedures to routinely review progress of compliance actions to prevent delays or breakdowns | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

D1. Yes, Yes. They are in Sections 12-15 of CT PURA GPSU's Administrative Procedures

- | | | | |
|----------|--|--------------------------------------|--|
| 2 | 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 = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| a. | Were compliance actions sent to company officer or manager/board member if municipal/government system? | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. | Were probable violations documented? | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| c. | Were probable violations resolved? | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| d. | Was the progress of probable violations routinely reviewed? | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

D2. Yes, yes, yes, yes, Inspections reviewed were 20140925DIMP, 20140617OQ, 20140617COMP, & 20141015SL; DIMP, OQ, Standard & Service Line Constr; 3 had PV. All were internally consistent, All followed procedures

- | | | | |
|----------|--|---|---|
| 3 | Did the state issue compliance actions for all probable violations discovered?
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

D3. Yes, 58 letters that addressed the 172 PV. See Attachment 5

- | | | | |
|----------|---|---|---|
| 4 | Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary.
Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

D4. Yes, Due Process is explained in Admin Procedures Sections 12-15, and this information is included in noncompliance letters

- | | | | |
|----------|---|---|---|
| 5 | Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

D5. Yes, Karl is staying within the penalty guidelines, but is using civil penalties more frequently than the previous Program Manager

- | | | | |
|----------|---|---|---|
| 6 | Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

D6. Yes, 58 letters that addressed the 172 PV, \$62K in penalties assessed, & \$39K in penalties collected. See Attachment 5

- | | | | |
|----------|--|-----------|-----------|
| 7 | General Comments:
Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

D7. 2014 was the third year for more frequent civil penalties. An area of emphasis is Excavation Damages

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



PART E - Incident Investigations

Points(MAX) Score

- 1 Does the state have written procedures to address state actions in the event of an incident/accident? 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

E1. Yes. The Administrative Procedures define what a Standard Inspection consists of in Section 7, the inspection interval times and ranking criteria are listed in Section 10, and Conducting of Inspections in Section 11

- 2 Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? And did state keep adequate records of Incident/Accident notifications received? Chapter 6 2 2

Yes = 2 No = 0 Needs Improvement = 1

- a. Acknowledgement of MOU between NTSB and PHMSA (Appendix D) Yes ☒ No ☐ Needs Improvement ☐
- b. Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E) Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

E2. Yes. CT has 2-3 inspectors on call each week. Operators call Karl Baker's cell phone and he contacts on-call inspectors
Yes. CT has 2-3 inspectors on call each week. Operators call Karl Baker's cell phone and he contacts on-call inspectors. See 'Procedures' in Section 20

- 3 If onsite investigation was not made, did state obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

E3. YES, In 21 years, EVERY reportable incident has been investigated on-site. In addition many leaks are investigated on-site

- 4 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? 3 NA

Yes = 3 No = 0 Needs Improvement = 1-2

- a. Observations and document review Yes ☒ No ☐ Needs Improvement ☐
- b. Contributing Factors Yes ☒ No ☐ Needs Improvement ☐
- c. Recommendations to prevent recurrences when appropriate Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

E4. NA. No Federally reportable incidents in 2014

- 5 Did the state initiate compliance action for violations found during any incident/accident investigation? 1 NA

Yes = 1 No = 0

Evaluator Notes:

E5. NA. No Federally reportable incidents in 2014

- 6 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 report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

E6. Yes. CT responds and investigates ALL reportable incidents

- 7 Does state share lessons learned from incidents/accidents? (sharing information, such as: at NAPS Region meetings, state seminars, etc) 1 1

Yes = 1 No = 0

Evaluator Notes:

E7. Yes, CT incidents/accidents have been presented at NAPSIR meetings and pipeline safety seminars. In addition, all incident/accident reports are sent to all applicable operators in the state for their review and response to any applicable recommendations included in the report

8 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

E8. Two reportable incidents in 2013 was an abnormal high count for CT. Safety is an area of emphasis, and, as expected, the incident count of 0 reflected the more normal 0 or 1 reportable incident per year

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



PART F - Damage Prevention

Points(MAX) Score

- | | | | |
|---|--|---|---|
| 1 | 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? NTSB
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

F1. Yes, Is reviewed during O&M audits. Last audits performed on 3 LDCs and Norwich in 2009, 2011, 2013 and 2015. Also state regulation, 16-345-4(a)(5), states "If the excavator is utilizing trenchless excavation, the excavator shall, if such excavation is expected to cross or encroach within the approximate location of underground facilities either horizontally or vertically, prior to the crossing or encroaching, determine the precise location of such underground facilities expected to be so crossed or encroached."

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

Evaluator Notes:

F2. Yes. Is reviewed during O&M audits. Last audits performed on 3 LDCs and Norwich in 2009, 2011, 2013 and 2015. This is also accomplished during normal review of One-Call damages that are reported to the GPSU

- | | | | |
|---|--|---|---|
| 3 | Did the state encourage and promote practices for reducing damages to all underground facilities to its regulated companies? (i.e. such as promoting/adopting the CGA Best Practices encouraging adoption of the 9 Elements, etc.)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

F3. Yes. The GPSU has performed a review of the CGA Best Practices document and determined that all pertinent best practices are included in the state regulations. We are currently working on revising our underground damage prevention laws and we are reviewing the CGA Best Practices to see if we can strengthen our program. Our state program has adopted the 9 elements

- | | | | |
|---|--|---|---|
| 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? (This can include DIRT and other data shared and reviewed by the pipeline safety program)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

F4. Yes, GPSU collects and evaluates this data.

2010, 3.5 total; 2.0 gas

2011, 2.8 total; 1.8 gas

2012, 3.0 total; 1.9 gas

2013, 3.1 total; 2.2 gas

2014, 2.9 total; 1.6 gas

Third party damages (all utilities) increased from 3.0 in 2012 to 3.1 in 2013. Third party damages (gas utilities only) increased from 1.9 in 2012 to 2.2 in 2013. This disturbing trend was recognized and measures such as increased scrutiny and a streamlined civil penalty process were employed to reduce damages. These additional measures continued in 2014

- | | | | |
|---|--|-----------|-----------|
| 5 | General Comments:
Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

F5. Damages per 1000 is a metric that is closely followed. Focus areas include increased civil penalties, Board participation in 'Call before you Dig', and approximately twice per year the damage prevention data is reviewed to determine trends. These trends are reviewed to determine where emphasis is to be placed. These trends are also reviewed with the Call Before You Dig Public Awareness Committee and where appropriate, the public awareness campaigns are modified

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

PART G - Field Inspections

Points(MAX) Score

- | | | |
|----------|---|--------------------|
| 1 | Operator, Inspector, Location, Date and PHMSA Representative
Info Only = No Points | Info OnlyInfo Only |
|----------|---|--------------------|

Name of Operator Inspected:
Algonquin Gas Transmission, opid 00288
Name of State Inspector(s) Observed:
John Depaolo, Inspector
Location of Inspection:
252 Shunpike RD, Cromwell, CT 06416
Date of Inspection:
10/27/15
Name of PHMSA Representative:
Patrick Gaume, State Liaison

Evaluator Notes:

G1. Algonquin Gas Transmission, opid 00288
John Depaolo, Inspector
252 Shunpike RD, Cromwell, CT 06416
10/27/15
Patrick Gaume, State Liaison

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

Evaluator Notes:

G2. Yes. 6 employees participated in the inspection

- | | | |
|----------|---|----------------|
| 3 | 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)
Yes = 2 No = 0 Needs Improvement = 1 | 2 2 |
|----------|---|----------------|

Evaluator Notes:

G3. Yes. Interstate operator IA inspection, part of an O&M system inspection

- | | | |
|----------|--|----------------|
| 4 | Did the inspector thoroughly document results of the inspection?
Yes = 2 No = 0 Needs Improvement = 1 | 2 2 |
|----------|--|----------------|

Evaluator Notes:

G4. Yes. The IA form is being filled out completely

- | | | |
|----------|--|----------------|
| 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.)
Yes = 1 No = 0 | 1 1 |
|----------|--|----------------|

Evaluator Notes:

G5. Yes. Computer, keys, hand tools, grease gun, half-cell, multi-meter

- | | | |
|----------|--|-------------------------------------|
| 6 | Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list)
Yes = 2 No = 0 Needs Improvement = 1 | 2 2 |
| | a. Procedures | <input checked="" type="checkbox"/> |
| | b. Records | <input checked="" type="checkbox"/> |
| | c. Field Activities | <input checked="" type="checkbox"/> |
| | d. Other (please comment) | <input type="checkbox"/> |

Evaluator Notes:

G6. Yes. Procedures, Records, Field activities, O&M Field inspection.

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

Evaluator Notes:

G7. Yes. John showed professional knowledge of his inspection duties

8	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) Yes = 1 No = 0	1	1
---	---	---	---

Evaluator Notes:

G8. Yes. No violations, missing nut and loose nuts on the pipe supports. Recommended frequent checks of half-cells and multi-meters to confirm they are still good.

9	During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable) Yes = 1 No = 0	1	1
---	---	---	---

Evaluator Notes:

G9. Yes. No violations, missing nut and loose nuts on the pipe supports. Recommended frequent checks of half-cells and multi-meters to confirm they are still good.

10	General Comments: 1) What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) 2) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) 3) Other. 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 checked="" type="checkbox"/> | |
| h. | Cast-iron Replacement | <input type="checkbox"/> | |
| i. | Damage Prevention | <input checked="" type="checkbox"/> | |
| j. | Deactivation | <input type="checkbox"/> | |
| k. | Emergency Procedures | <input type="checkbox"/> | |
| l. | Inspection of Right-of-Way | <input checked="" 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 type="checkbox"/> | |
| r. | Moving Pipe | <input type="checkbox"/> | |
| s. | New Construction | <input 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 type="checkbox"/> | |
| x. | Public Education | <input type="checkbox"/> | |
| y. | Purging | <input type="checkbox"/> | |
| z. | Prevention of Accidental Ignition | <input checked="" type="checkbox"/> | |

- | | | |
|----|-----------------------------|-------------------------------------|
| A. | Repairs | <input type="checkbox"/> |
| B. | Signs | <input type="checkbox"/> |
| C. | Tapping | <input type="checkbox"/> |
| D. | Valve Maintenance | <input checked="" 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 checked="" type="checkbox"/> |
| J. | Other | <input type="checkbox"/> |

Evaluator Notes:

G10. Yes

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



PART H - Interstate Agent State (If Applicable)**Points(MAX) Score**

- | | | | |
|----------|--|---|---|
| 1 | Did the state use the current federal inspection form(s)?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

H1. Yes. IA is used

- | | | | |
|----------|---|---|---|
| 2 | Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

H2. Yes. Reviewed the PHMSA-ER State Tracking spreadsheet which shows CT to be in compliance with its IA obligations

- | | | | |
|----------|--|---|---|
| 3 | Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

H3. Yes. Spreadsheet dates are within timeframe

- | | | | |
|----------|---|---|---|
| 4 | Were 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.)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

H4. Yes. 3 PV were identified and reported to the Eastern Region

- | | | | |
|----------|---|---|----|
| 5 | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

H5. NA, none of the 3 PV were an imminent safety hazard. Regardless, they were promptly reported

- | | | | |
|----------|--|---|---|
| 6 | Did the state give written notice to PHMSA within 60 days of all probable violations found?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

H6. Yes. 3 PV were identified and reported to the Eastern Region within four days

- | | | | |
|----------|---|---|---|
| 7 | Did the state initially submit documentation to support compliance action by PHMSA on probable violations?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

H7. Yes. The documentation was included in the notification to PHMSA

- | | | | |
|----------|--|-----------|-----------|
| 8 | General Comments:
Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

H8. CT sees value in being an IA. The interstate Operators in CT were found to be generally in compliance with the regulations

Total points scored for this section: 6
Total possible points for this section: 6

PART I - 60106 Agreement State (If Applicable)**Points(MAX) Score**

- | | | | |
|----------|--|---|----|
| 1 | Did the state use the current federal inspection form(s)?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

I1-7. NA. Not a 60106 Program.

- | | | | |
|----------|--|---|----|
| 2 | Are results documented demonstrating inspection units were reviewed in accordance with state inspection plan?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

I1-7. NA. Not a 60106 Program.

- | | | | |
|----------|---|---|----|
| 3 | 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.)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

I1-7. NA. Not a 60106 Program.

- | | | | |
|----------|---|---|----|
| 4 | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

I1-7. NA. Not a 60106 Program.

- | | | | |
|----------|--|---|----|
| 5 | Did the state give written notice to PHMSA within 60 days of all probable violations found?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

I1-7. NA. Not a 60106 Program.

- | | | | |
|----------|--|---|----|
| 6 | Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

I1-7. NA. Not a 60106 Program.

- | | | | |
|----------|--|-----------|-----------|
| 7 | General Comments:
Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

I1-7. NA. Not a 60106 Program.

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