



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

FLORIDA PUBLIC SERVICE COMMISSION, Bureau of Safety

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: Florida

Agency Status:

Date of Visit: 04/27/2015 - 04/30/2015

Agency Representative: Rick Moses, Safety Bureau Chief

PHMSA Representative: Patrick Gaume, State Liaison

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

Name/Title: Art Graham, Chairman

Agency: Florida Public Service Commission

Address: 2540 Shumard Oak Blvd.

City/State/Zip: Tallahassee, Florida 32399-0850

Rating:

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

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

Possible Points Points Scored

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)

10	7.5
13	13
45	43
15	14
10	10
8	8
12	12
0	0
0	0

TOTALS

113 107.5

State Rating

95.1

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 | 0.5 |
|---|---|---|-----|

Evaluator Notes:

A1. NI. 0.5 of 1. Attachment 1 in disagreement with Attachment 3. Private Unit count should be 32 and Intrastate transmission Units should be 25. Operators with Intrastate transmission should be 18. Operators inspected should be 26 for Municipal and 18 for Intrastate Transmission, (the incorrect numbers submitted were 33, 22, 6, 27 & 3) . A corrected Attachment 1 will be submitted to Fedstar

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

Evaluator Notes:

A2. NO. Attachment 2 was recalculated on 4/29/15 to show days in the field performing inspection duties. We discovered that Section 2.6.2 of the State Guidelines is not clear that the time should show days in the field performing inspection duties. Attachment 2 as submitted was showing total time dedicated to pipeline safety, both field and office, and also captured overtime hours. The total hours were then divided by 8 and entered as approximate days. This is a multiple year error, at least for the last 10 years and likely from the beginning. A corrected Attachment 2 will be submitted to Fedstar. Total days changed from 1227.62 to 890.139. Drug & Alcohol inspections changed from 59 to 63.

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| 3 | Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 0.5 |
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Evaluator Notes:

A3. NI. 0.5 of 1. Attachment 3 in disagreement with Attachment 1. Chesapeake Utilities Corporation should show 4 private and 2 transmission (not 5 & 1). Citrusco North America has the same opid as Chesapeake Utilities Corporation and will be deleted with its transmission unit moved into Chesapeake. FL City Gas should show 3 private and 1 transmission (not 2 & 1). Florida Public Utilities Company should show 9 private (not 6). Peninsula Pipeline Company should show 1 transmission unit, (not 3 private Distr Units). Peoples Gas System TECO should show 14 private and 6 transmission, (not 16 & 6). Unit totals should show 32, 27, 5, 0, 4, 25, 000000, with Total Operators 54. A corrected Attachment 3 will be submitted to Fedstar.

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

A4. YES. The FPSC included two incidents (only one was significant) in Attachment 4. The Pipeline Data Mart had one reportable incident for CY2014. One of the incidents on Attachment 4 was not required to be reported. There were no omissions.

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

Evaluator Notes:

A5. Yes. Information on Attachment 5 was reported correctly

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|---|---|---|---|
| 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. No issues with file organization

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|---|---|---|-----|
| 7 | Was employee listing and completed training accurate and complete? - Progress Report Attachment 7 | 1 | 0.5 |
|---|---|---|-----|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A7. N.I. 0.5 of 1 point. After discussion, it was decided that employee time dedicated to pipeline safety should be changed. Time that was reported at 95% will be changed to show 100%. The number of months charged to the program will also be reviewed. Concerning TQ training; The training information downloaded by PHMSA from the Training and Qualification database had an error such that the OQ WBT for Diana Fehling was not shown. FPSC internal records were able to show that training. A revised Attachment 7 will be submitted. All person-years calculations will be revised; i.e. Inspectors is now 6.58 (was 4.55) & Total is now 8.83 (was 6.29)

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

Evaluator Notes:

A8. Yes. No issues were found with the status of amendment adoptions

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

Evaluator Notes:

A9. Yes. Several accomplishments and agenda items were mentioned in Attachment 10

10	General Comments:	Info Only	Info Only
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Info Only = No Points

Evaluator Notes:

A10. issues were identified with Attachments 1, 2, 3 & 7. Corrections and re-submissions have been promised

Total points scored for this section: 7.5
Total possible points for this section: 10



PART B - Program Inspection Procedures

Points(MAX) Score

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|---|--|---|---|
| 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. Each operator and unit will receive an inspection annually. Standard inspections are included in the FPSC's Standard Operating Procedures (SOP). Excerpt from SOP, Page 28: "C. PROCEDURES: 1. Gas System Annual Compliance Evaluation d. The safety engineer analyzes and evaluates the system's new construction standards, operation and maintenance procedures, emergency plan procedures, operator qualification procedures, public awareness procedures, drug and alcohol procedures, and integrity management procedures, where applicable, to ascertain that such procedures comply with the adopted Federal Regulations and FPSC Rules."

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|---|--|---|---|
| 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. Each operator and unit will receive an inspection annually. IMP inspections are included in the FPSC's Standard Operating Procedures (SOP). Excerpt from SOP, Page 28: "C. PROCEDURES: 1. Gas System Annual Compliance Evaluation d. The safety engineer analyzes and evaluates the system's new construction standards, operation and maintenance procedures, emergency plan procedures, operator qualification procedures, public awareness procedures, drug and alcohol procedures, and integrity management procedures, where applicable, to ascertain that such procedures comply with the adopted Federal Regulations and FPSC Rules."

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|---|--|---|---|
| 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. Each operator and unit will receive an inspection annually. Operator Qualification inspections are included in the FPSC's Standard Operating Procedures (SOP). Excerpt from SOP, Page 28: "C. PROCEDURES: 1. Gas System Annual Compliance Evaluation d. The safety engineer analyzes and evaluates the system's new construction standards, operation and maintenance procedures, emergency plan procedures, operator qualification procedures, public awareness procedures, drug and alcohol procedures, and integrity management procedures, where applicable, to ascertain that such procedures comply with the adopted Federal Regulations and FPSC Rules."

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|---|---|---|---|
| 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. Each operator and unit will receive an inspection annually. Operator Qualification inspections are included in the FPSC's Standard Operating Procedures (SOP). Excerpt from SOP, Page 28: "C. PROCEDURES: 1. Gas System Annual Compliance Evaluation d. The safety engineer analyzes and evaluates the system's new construction standards, operation and maintenance procedures, emergency plan procedures, operator qualification procedures, public awareness procedures, drug and alcohol procedures, and integrity management procedures, where applicable, to ascertain that such procedures comply with the adopted Federal Regulations and FPSC Rules."

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| 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. Inspectors provide on-site training during almost every inspection. During 2015 the PM made a safety presentation at the FL Nat Gas Assn mtg, They distribute the PHMSA small operator handbook. They distribute the FL Pipeline Safety Rules. They fully participate in the FL Pipeline Safety Seminar every 3rd year

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| 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. Each operator and unit will receive an inspection annually. Operator Qualification inspections are included in the FPSC's Standard Operating Procedures (SOP). Excerpt from SOP, Page 28: "C. PROCEDURES: 1. Gas System Annual Compliance Evaluation d. The safety engineer analyzes and evaluates the system's new construction standards, operation and maintenance procedures, emergency plan procedures, operator qualification procedures, public awareness procedures, drug and alcohol procedures, and integrity management procedures, where applicable, to ascertain that such procedures comply with the adopted Federal Regulations and FPSC Rules."

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|----|---|--------------------------------------|--|
| 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. The FPSC inspects each operator and unit annually. The scheduling within the year and the scope is determined as described

below: See excerpt from C.1.c and d, Page 28, of the FPSC's SOP below:

c. Prior to beginning the evaluation, the safety engineer should determine if any construction or repair work is in progress. If so, arrange to visit one or more sites during the evaluation and observe the construction design, materials, joining and installation for compliance with applicable regulations. d. The scope and depth of each safety evaluation will be determined by the engineer and supervisor. Considerations for the scope and depth of evaluations; past compliance in an area of evaluation, known changes that may effect the system, known problem areas, new safety compliance programs, new or changed safety regulations, emergencies, workload, time, job knowledge and staffing. See excerpt The FPSC inspects each operator and unit annually. The scheduling within the year and the scope is determined as described below: See excerpt from C.1.c and d, Page 28, of the FPSC's SOP below: from Page 8 of the FPSC's SOP below: A. TITLE: QUALITY ASSURANCE OF SAFETY EVALUATIONS B. PURPOSE: To provide Engineering managers guidance on the productivity and overall quality assurance of electric and gas safety evaluations. C. PROCEDURES: 1. Assignment of systems ? Once each calendar year, the Bureau Chief and Supervisors of the Safety section will meet with meeting can be either in person or by teleconference. System assignments should strive for an annual evaluation for all systems and consider the field staff experience, travel requirements, past history and trends of system evaluations, and other pertinent items. Such assignments should also rotate assignments in order to avoid the review of a system by the same field personnel for two consecutive years.

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| 8 | General Comments:
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

B8. Yes. The FPSC complied with Part B of this evaluation

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):
890.09
- B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 6.58 = 1448.33
- Ratio: A / B
890.09 / 1448.33 = 0.61
- If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0
Points = 5

Evaluator Notes:

C1. Yes. The revised value A is 890.139 days. The revised value B is 6.58 person-years.
 $890.139 / (6.58 * 220) = .6149$. $.6149 > .38$ okay.

- 2** Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines Appendix C for requirements) Chapter 4.4 5 4
Yes = 5 No = 0 Needs Improvement = 1-4
- a. Completion of Required OQ Training before conducting inspection as lead? Yes ☐ No ☐ Needs Improvement ☒
- b. Completion of Required DIMP*/IMP Training before conducting inspection as lead? *Effective Evaluation CY2013 Yes ☒ No ☐ Needs Improvement ☐
- c. Root Cause Training by at least one inspector/program manager Yes ☒ No ☐ Needs Improvement ☐
- d. Note any outside training completed Yes ☒ No ☐ Needs Improvement ☐
- e. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector. Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

C2. NI. 4 of 5 points. MCROY, JAMES & SIMPSON, ROBERT were found to not have record of completing the PHMSA-PL3OQ Operator Qualification WBT Course. They have all conducted OQ protocol 9 inspections and were confirmed by the Program Manager of having conducted full OQ inspections. The Program Manager sent out an email & James & Robert completed the OQ WBT on 4/29/15.

Karl Chen has taken the Root Cause Analysis course

- 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. Rick Moses has been in the program manager role for approximately four years. Rick has completed the core courses at PHMSA's TQ training facility.

- 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. Yes. Chair letter was dated 6/12/14, and the Chair response was dated 6/25/14. It addressed both items.

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

Evaluator Notes:

C5. Yes. The FPSC held its last pipeline safety seminar in February, 2012. As an FYI, FPSC just completed another pipeline safety seminar on April 7-8, 2015 with about 80 attendees.

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
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Evaluator Notes:

C6. Yes. Most Units are inspected every year, and all Units are inspected to all types of inspections within the 5 yr. max interval.

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
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Evaluator Notes:

C7. Yes. The FLPSC uses inspection forms that were developed by the FLPSC. The forms are as follows: GS-1 New Construction Requirements Checklist GS-3 Inspection and Maintenance Requirements Checklist GS-5 Pressure Regulating Station Data Checklist GS-6 Odorization Checklist GS-13 Annual Natural Gas Pipeline Safety Summary GS-9 Construction Inspection Checklist - Visual GS-10 Gas Incident/Accident Inspection Checklist GS-11 Notification of Commission Rule Violation GS- Drug /Alcohol Programs Public Awareness Plan PHMSA DIMP 192.1005-192.1001 Distribution Operators PHMSA DIMP 192.1015 Master Meters No issues were found where the FPSC forms did not cover a requirement on the federal forms.

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
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Evaluator Notes:

C8. Yes. The FLPSC covers this issue on Page 12 of its GS-03 inspection form.

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
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Evaluator Notes:

C9. Yes. The FLPSC reviews operators' leak repair records and verifies that operators are noting whether cast iron leaks are resulting from circumferential cracking. This issue is covered in the continuing surveillance section on Page 3 of the GS-03 Inspection Form.

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
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Evaluator Notes:

C10. Yes. The FLPSC reviews operators leak repair records as a part of its standard inspections. This issue is covered on Page 4 of the GS-03 Inspection Form.

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
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Evaluator Notes:

C11. Yes. The FLPSC reviews operators' compliance with the requirements of 192.617 when it conducts standard inspections and completes the GS-03 inspection form.

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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 |
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Evaluator Notes:

C12. Yes. Operators are required to submit a copy of its Annual Report to the FLPSC each year. Operators are notified of any inconsistencies found during the FLPSC's review. The FPSC's SOP states that inspectors are to check annual reports for accuracy during the inspection. The annual report has the data trends obtained from annual reports

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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. A review of the OQ & IMP database for FL shows the Inspections have been uploaded & populated with copies of the inspections.

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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 | 0 |
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Evaluator Notes:

C14. NO. 0 of 1 point. This question is absent from the Standard Inspection form and FPSC was not aware that NPMS needed to be checked against Transmission Units regularly. As of 4/29/15 FPSC has created a question to address this and add it to their Form GS-13 Evaluation Summary Form. This form is used during a Standard Inspection.

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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. D&A inspections are part of every Standard inspection, and the long form is part of every headquarters inspection.

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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. OQ program & field inspections are performed yearly for most operators.

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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 | 2 |
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Evaluator Notes:

C17. Yes. TIMP is on a 5 yr cycle. Some operators are inspected each year such that all operators are inspected within the 5 yr cycle.

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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. The FPSC completed the first round of DIMP inspections in CY2013. Most LDCs are inspected for DIMP risk review annually during Standard inspections.

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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 |
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Evaluator Notes:

C19. Yes. The PAPEI initial inspections were finished in 1st half 2014. It is planned that PAPEI forms will be used every year for each operator and in many Units as a continuing monitoring effort.

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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 |
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Evaluator Notes:

C20. YES. The FLPSC has a section in its website that allows the public to view summary enforcement information and communicate with the Bureau of Safety on pipeline safety concerns.

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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 |
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Evaluator Notes:

NA. There were no SRC's reported by intrastate pipeline operators during CY2014.

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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 |
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Evaluator Notes:

C22. Yes. This question is addressed during incidents and standard inspections and also noted on the annual report.

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| 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 |
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Evaluator Notes:

C23. Yes. FPSC responds to all NAPSRS surveys except for liquid issues where they have nothing to contribute.

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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 |
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Evaluator Notes:

C24. NA. There are no waiver/special permits on file with PHMSA where the FPSC granted a waiver of any pipeline safety rules and regulations.

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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 |
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Evaluator Notes:

C25. Yes. The PM attended both the Regional and National Meetings.

26	Discussion on State Program Performance Metrics found on Stakeholder Communication 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	0	0
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Evaluator Notes:

C26. The metrics appear to be accurate. It will be some years before the data proves to be beneficial.

27	General Comments: Info Only = No Points	Info Only	Info Only
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Evaluator Notes:

C27. Two points were lost in this section (C2 & C14).

Total points scored for this section: 43
Total possible points for this section: 45



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. . Review of the FPSC SOP 1130 addresses both the notification of a company officer/City CEO and the Review Progress 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. Upon a review of the FLPSC's 2014 inspection report spreadsheet, the FLPSC documented the responses to its written notifications. Based upon the information in the spreadsheet, Operators responded to the FLPSC's notifications within the timeframe specified in the written notification from the FLPSC. Upon a review of randomly selected inspection reports, compliance letters were sent to the appropriate operator official and probable violations were sufficiently documented.

- | | | | |
|----------|--|---|---|
| 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. Upon a review of randomly selected 2014 inspection report files, written notification was sent to operators documenting the probable violations found during the inspection. All probable violations noted on inspection forms were addressed.

- | | | | |
|----------|---|---|---|
| 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. The FPSC's enforcement letters provide operators with the opportunity to provide evidence that it was in compliance Operators are given the option to request hearings with the FLPSC Commissioners to present their arguments.

- | | | | |
|----------|---|---|---|
| 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. Rick Moses explained the FPSC's process for issuing civil penalties. The FPSC has determined criteria that is used in assessing the amount of the civil penalty to be sought.

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

Evaluator Notes:

D6. NO. 0 of 1 point. The FPSC could not show that they have issued a fine in the last 10 years nor ordered safety related repairs in lieu of a fine.

7 General Comments:
Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

D7. 1 point was lost in this section, (D6). FPSC understands that there is pressure to issue civil penalties for certain violations.

Total points scored for this section: 14
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. On Page 24 of the FPSC's SOP, procedures for conducting accident investigations are described. See excerpt from SOP below:

1. Accident/Interruption of Service Investigation a. Contact the utility management explaining the purpose of your investigation and update details obtained relative to the incident since the initial report. b. Ascertain the sequence of events leading up to the incident including times of occurrence. c. Review the necessary records. Have records pulled and copy those that provide information that assists in the investigation. d. Visit the scene. View the area in light of the knowledge gained to find information which supports or contradicts reports received. e. Interview available personnel of police and fire departments, insurance companies and others who have knowledge of the incident. f. Perform tests on the equipment involved or in the soil adjacent to the scene, if needed. g. Take pictures of pertinent information at the scene and/or obtain prints of pictures taken by the utility, police, fire department or others where possible. h. Review additional records obtained from the utility, if any, and discuss the findings with the utility management prior to leaving, including any possible violations of Commission Rules and/or Federal Regulations. i. Obtain and complete a Florida Public Service Commission Accident & Incident Report (GS-10). Make sure to include all supporting documents. This form may be obtained from the Chief of the Bureau of Safety.

- 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. The FLPSC requires operators to telephonically notify it when an incident occurs. Operators are provided with a telephone number to contact during and after normal work hours. The FLPSC program manager is also very active in the emergency management process for the state. Two incidents were reported on Attachment 4 of the 2014 Progress Report.

- 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. All incidents were investigated at the incident site.

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

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. Yes. The two incidents were investigated thoroughly. No probable violation of the pipeline safety regulations was found in either investigation.

- 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 probable violations were found.

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

Evaluator Notes:

E6. Yes. The Southern Region Office did not have any issues with the FPSC's performance on this issue.

- | | | | |
|---|---|---|---|
| 7 | Does state share lessons learned from incidents/accidents? (sharing information, such as: at NAPS Region meetings, state seminars, etc)
Yes = 1 No = 0 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

E7. Yes. These incidents were shared with NAPS Region members during Region meetings.

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

Evaluator Notes:

E8. FPSC fully responds to significant pipeline incidents.

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



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. This question was added to the FPSC's GS-3 inspection form.

- | | | | |
|---|---|---|---|
| 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. Part 192.614 provides the regulatory requirements for an operator's damage prevention program. The FLPSC covers 192.614 requirements during its standard inspections. The FLPSC's inspection form is documented with the results of the inspection.

- | | | | |
|---|--|---|---|
| 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 FLPSC is prohibited from introducing legislation, but the FPSC has worked with Florida's One Call Center (FOCC) to develop legislative proposals to revise Florida damage prevention laws such that they now have the 9 elements contained in the PIPES Act. The FPSC has discussed CGA Best Practices with the FOCC and operators in various forums such as Pipeline Safety Seminars.

- | | | | |
|---|--|---|---|
| 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. The FLPSC includes a trend chart of this data in its Annual Pipeline Safety Report provided to the Commissioners each year.

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

Evaluator Notes:

F5. Yes. FPSC works with FL One Call to accomplish the requirements of Damage Prevention.

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 Info Only
Info Only = No Points

Name of Operator Inspected:

Peoples Gas System TECO, opid 15348

Name of State Inspector(s) Observed:

Blesson Mathew, Engineer Specialist

Location of Inspection:

316 SW 33rd Ave, Ocala, FL 34471

Date of Inspection:

4/29/15

Name of PHMSA Representative:

Patrick Gaume

Evaluator Notes:

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

Evaluator Notes:

G2. Yes. The TECO manager and 2 techs, (Mike, Brian, & Mark), participated throughout 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) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

G3. Yes. 3 copies of FL form GS-05 were used which are specialty forms for pressure regulators and also a 'Valve Maintenance Survey' form which was for inspecting 6 critical valves.

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

Evaluator Notes:

G4. Yes. The forms are detailed, user friendly and were convenient to use.

- 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.) 1 1
Yes = 1 No = 0

Evaluator Notes:

G5. Yes. Two instrument techs participated in the field inspection and had fully equipped trucks; which included, pressure gauges, valve keys, lock keys, stickers, hand tools, valve cover lifters, measuring wheels, pressure hoses, pressure relief controllers, PPE, valve locate maps, & valve handles.

- 6 Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) 2 2
Yes = 2 No = 0 Needs Improvement = 1

a. Procedures ☐

b. Records ☒

c. Field Activities ☒

d. Other (please comment) ☐

Evaluator Notes:

G6. Yes. The day's inspection was dedicated to inspecting regulator stations and critical valves. Regulator settings and valve locations were compared against company records.

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
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Evaluator Notes:

G7. Yes. Blesson demonstrated a professional level knowledge of the pipeline safety program and its regulations.

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
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Evaluator Notes:

G8. Yes. Blesson noted a discrepancy on one of the critical valve locate maps and noted a 'stiff & difficult to operate' critical valve.

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

G9. Yes. Blesson noted a discrepancy on one of the critical valve locate maps and noted a 'stiff & difficult to operate, critical valve

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
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- | | | | |
|----|-----------------------------------|-------------------------------------|--|
| a. | Abandonment | <input type="checkbox"/> | |
| b. | Abnormal Operations | <input checked="" 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 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 checked="" 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 type="checkbox"/> | |
| t. | Navigable Waterway Crossings | <input type="checkbox"/> | |
| u. | Odorization | <input type="checkbox"/> | |
| v. | Overpressure Safety Devices | <input checked="" 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 type="checkbox"/> | |
| A. | Repairs | <input type="checkbox"/> | |
| B. | Signs | <input checked="" 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 type="checkbox"/> |
| H. | Compliance Follow-up | <input type="checkbox"/> |
| I. | Atmospheric Corrosion | <input checked="" type="checkbox"/> |
| J. | Other | <input type="checkbox"/> |

Evaluator Notes:

G10. Additional items checked included, emergency number, locks, fencing, signs, pipe markers, vehicle barriers, regulator lockups, valve actuation, relief device discharge safety, ROW, debris and vegetation check.

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 | NA |
|----------|--|---|----|

Evaluator Notes:

H1-8. NA. The FPSC is not an interstate agent.

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

Evaluator Notes:

H1-8. NA. The FPSC is not an interstate agent.

- | | | | |
|----------|--|---|----|
| 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 | NA |
|----------|--|---|----|

Evaluator Notes:

H1-8. NA. The FPSC is not an interstate agent.

- | | | | |
|----------|---|---|----|
| 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 | NA |
|----------|---|---|----|

Evaluator Notes:

H1-8. NA. The FPSC is not an interstate agent.

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

H1-8. NA. The FPSC is not an interstate agent.

- | | | | |
|----------|--|---|----|
| 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 | NA |
|----------|--|---|----|

Evaluator Notes:

H1-8. NA. The FPSC is not an interstate agent.

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

Evaluator Notes:

H1-8. NA. The FPSC is not an interstate agent.

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

Evaluator Notes:

H1-8. NA. The FPSC is not an interstate agent.

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

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. The FPSC does not have a 60106(a) agreement with PHMSA.

- | | | | |
|----------|--|---|----|
| 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. The FPSC does not have a 60106(a) agreement with PHMSA.

- | | | | |
|----------|---|---|----|
| 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. The FPSC does not have a 60106(a) agreement with PHMSA.

- | | | | |
|----------|---|---|----|
| 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. The FPSC does not have a 60106(a) agreement with PHMSA.

- | | | | |
|----------|--|---|----|
| 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. The FPSC does not have a 60106(a) agreement with PHMSA.

- | | | | |
|----------|--|---|----|
| 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. The FPSC does not have a 60106(a) agreement with PHMSA.

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

Evaluator Notes:

I1-7. NA. The FPSC does not have a 60106(a) agreement with PHMSA.

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