



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

1200 New Jersey Avenue SE  
Washington DC 20590

## 2015 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)



# 2015 Gas State Program Evaluation -- CY 2015

## Gas

**State Agency:** Florida

**Agency Status:**

**Date of Visit:** 05/31/2016 - 06/17/2016

**Agency Representative:** Rick Moses, Safety Bureau Chief  
Wendi Denison, Staff Assistant  
Tom Ballinger, Director of Engineering  
Peter Queirolo, Budget Analyst  
Farhan Alnajar, Engineering Specialist  
Hassan Badran, Engineering Specialist

**PHMSA Representative:** Glynn Blanton, USDOT/PHMSA State Programs

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

**Name/Title:** Julie I. Brown, 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 2015 (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 10  
13 13  
50 50  
15 15  
11 11  
8 8  
12 12  
0 0  
0 0

#### TOTALS

119 119

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

Evaluator Notes:

A review of attachment 1 found no issues of concerns. All information was correct. A review of Florida State Statute gives jurisdictional authority over Master Meter operators that sub-meter to customers only. All other master meter operators are under federal jurisdiction.

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

Evaluator Notes:

Reviewed progress report attachment 2. No issues of concerns were found. Noted the number of drug and alcohol inspections performed. Program Manager mentioned they have moved from recording the inspections by number of hours spend to days inspected.

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

Evaluator Notes:

Reviewed attachment 3 and found information to be correct. No areas of concerns.

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

Evaluator Notes:

Yes, two reportable incidents occurred in CY2015. FL PSC investigated each incident or made a decision to not go to the site. The first incident occurred on February 24, 2015, at 1449 West Palmetto Park in Boca, FL. The decision to not go was based on no ignition occurred. The second incident occurred on May 10, 2015 at 340 SW S. Maceda Blvd in Port Lucie, FL. A driver loss control of the vehicle and damaged the district regulator station. No injures occurred but a loss of service did results in a loss of service to 6,436 customers. A report of the incident information was located in their files.

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

Evaluator Notes:

Reviewed attachment 5 and found the number of compliance actions taken were correct.

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

Evaluator Notes:

Yes, reviewed spreadsheets, files and data bases and found documentation well-organized. No areas of concerns.

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

Evaluator Notes:

Reviewed attachment 7 and TQ records. Three new inspectors are on scheduled to complete required training within three years.

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|---|--|---|---|
| 8 | Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8 | 1 | 1 |
|---|--|---|---|



Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, reviewed information and found correct. A review of " Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Edits" are scheduled to be adopted during State of Florida legislature hearings in CY2016.

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**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:

Yes, detailed information on accomplishments and planned or future activities were provided. Noted a detailed description on meeting the nine elements of an effective damage prevention program was provided.

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**10** General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section of the review.

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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:**

Yes. Florida Public Service Commission's Standard Operating Procedures, Section 1111 contains pre-inspection, inspection and post inspection procedures. This information is listed on pages 27-28.

- |   |  |   |   |
|---|--|---|---|
| 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:**

Yes. Florida Public Service Commission's Standard Operating Procedures, Section 1111 page 27, address this item. No concerns.

- |   |  |   |   |
|---|--|---|---|
| 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:**

Yes. Florida Public Service Commission's Standard Operating Procedures, Section 1111, C. Procedures, Inspection Activities, (a) address OQ procedures. This information is located on pages 27-28.

- |   |   |   |   |
|---|---|---|---|
| 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:**

Yes. Florida Public Service Commission's Standard Operating Procedures, Section 1111, C. Procedures, Inspection Activities, (a) address Public Awareness/Damage Prevention procedures. This information is located on pages 27.

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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:**

Yes. FL PSC seminar was conducted April 7, 2015 in Tallahassee, FL. Rick Moses also attended the Florida Natural Gas Association Meeting in July, 2015 and provided an up date on regulation changes or proposed rules to the operators in attendance.

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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:**

Yes. Florida Public Service Commission's Standard Operating Procedures, Section 1111, C. Procedures, Inspection Activities, (a) address Construction Inspection on page 28.

7 Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? 6 6

Yes = 6 No = 0 Needs Improvement = 1-5

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

FL PSC inspects all operators once a year not to exceed 15 months. A standard inspection is performed on each operator by reviewing their procedures and maintenance records. Operating history of operator and length of time since the last inspection is reviewed by the inspector prior to conducting an inspection. Inspectors are assigned a regional location in the state to perform inspections. If a violation was cited in previous year, the inspector will schedule a follow-up inspection in the current year before conducting another inspection. All inspection units are broken down correctly. Information on the inspection priorities are listed in Florida Public Service Commission's Standard Operating Procedures, Section 1111, A, page 27.

8 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section of the review.

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):  
904.40

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
220 X 6.75 = 1485.00

Ratio: A / B  
904.40 / 1485.00 = 0.61

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

### Evaluator Notes:

A.Total Inspection Person Days (Attachment 2)= 904.4

B.Total Inspection Person Days Charged to the program(220\*Number of Inspection person years(Attachment 7)=1484.99934

Formula:- Ratio = A/B = 904.4/1484.99934 = 0.61

Rule:- (If Ratio  $\geq$ .38 then points = 5 else Points = 0.)

Thus Points = 5

- 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:

a. All FL PSC inspectors have completed OQ training courses before conducting an OQ inspection.

b. Marcelina Alvarez, Karl Chen, James McRoy, Robert Simpson have completed the DIMP courses and are lead inspectors on each DIMP inspection. Karl Chen is the only IMP lead inspector.

c.Karl Chen has taken the Root Cause Analysis course.

d. No additional outside training has been completed by FL PSC staff members in CY2015.

e. The following inspectors have completed the required courses to perform gas standard inspections: Marcelina Alvarez, Karl Chen, James McRoy, Rick Moses, Robert Simpson, Tony Velazquez & Norman Witman.

- 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:

Yes, Rick Moses has been the program manager for five years. He has completed all required courses at TQ within three years and qualified to conduct gas inspections.

- 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:

Yes, Chairman Art Graham's response letter to Zach Barrett was received on November 3, 2015 and within the required 60 day time period. No issues.

- 5 Did State hold PHMSA TQ Seminar in Past 3 Years? Chapter 8.5 2 2

Yes = 2 No = 0

Evaluator Notes:

Yes, FL PSC held a pipeline safety seminar in Tallahassee, FL on April 7-8, 2015. Approximately eighty operators were in attendance.

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|----------|--|---|---|
| <b>6</b> | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1<br>Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|----------|--|---|---|

Evaluator Notes:

Yes, all operators are inspected once a year not to exceed 15 months. A review of inspection records and spreadsheets confirm all inspection units were inspected in CY2015. No areas of concerns.

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- |          |  |   |   |
|----------|--|---|---|
| <b>7</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

FL PSC has developed and uses their own inspection forms. The forms contain all federal regulations and State of Florida or FL PSC regulations that are enforceable by the agency. The following federal forms are used: PHMSA Form 13 Drug and Alcohol, PHMSA OQ Inspection form 14, Field Inspection form 15, Public Awareness Plan Form 21, and PHMSA Gas Integrity Management Inspection Protocols. FL PSC forms are as follows: GS-1 New Construction Requirements Checklist, GS-3 Operation 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-12 Special Drug /Alcohol Programs and GS 14 Valve Survey.

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- |          |   |   |   |
|----------|---|---|---|
| <b>8</b> | Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Chapter 5.1<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Yes, a review of FL PSC forms found this item is listed in GS-3 Inspection and Maintenance Requirements Checklist pages 11-12.

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- |          |  |   |   |
|----------|--|---|---|
| <b>9</b> | Did the state review operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance) (NTSB) Chapter 5.1<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Yes, a review of FL PSC forms found this item is listed in GS-3 Inspection and Maintenance Requirements Checklist on pages 3. No areas of concerns.

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|-----------|---|---|---|
| <b>10</b> | Did the state review operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21? (NTSB) Chapter 5.1<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes, a review of FL PSC forms found this item is listed in GS-3 Inspection and Maintenance Requirements Checklist pages 3-4, under Emergency Plans.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>11</b> | Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 192.617? Chapter 5.1<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:



Yes, a review of FL PSC forms found this item is listed in GS-3 Inspection and Maintenance Requirements Checklist page 5, under Failure Investigation Procedures.

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|-----------|--|---|---|
| <b>12</b> | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues?<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|

Evaluator Notes:

Yes, all operators are required to submit their annual report to the FL PSC. After a review of the reports has been completed by inspectors, if inconsistencies are found the operator is notified. Additionally, the reports are checked for accuracy during all gas safety inspections.

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

Evaluator Notes:

Yes, a review of OQ/IMP database found inspection results have been uploaded into the database program.

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

Yes, a review of OQ/IMP database found ninety-nine OQ inspections have been uploaded and four IMP inspections for CY2015 submitted. No issues of concerns.

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| <b>15</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

Yes, this is checked and reviewed by inspectors on GS-13 form during the inspection of the operator.

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| <b>16</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

Yes, FL PSC inspectors use the federal form in verifying the operators OQ programs are up to date. Reviewed files and found this information is being checked on each form. No issues.

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|-----------|--|---|---|
| <b>17</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|

Evaluator Notes:

Yes, FL PSC inspectors use the federal gas transmission integrity form to check this item and verify the operator's plan is up to date.

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|-----------|--|---|---|
| <b>18</b> | Is state verifying operator's gas distribution integrity management Programs (DIMP)?<br>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 have been complete by December 2014<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|

Evaluator Notes:

Yes, FL PSC is using the federal DIMP form to check this item. A review of inspection files confirm all operators had a DIMP inspection in CY2013. In CY2015, twenty-seven DIMP inspections were performed and resulted entered in the database program.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>19</b> | 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 be conducted every four years per RP1162<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|
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Evaluator Notes:

Yes, FL PSC uses the federal form 21, PAPEI, to verify this information. All operators were inspection by the end of CY2014. A review of files show thirty inspections were performed in CY2015.

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|-----------|--|---|---|
| <b>20</b> | 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).<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|
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Evaluator Notes:

Yes, this is accomplished via the FL PSC website. The website allows the public to view all documented enforcement actions taken against operators. The public can communicate with the agency via email regarding questions about the operator or reports available. No issues of concerns were found.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>21</b> | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|
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Evaluator Notes:

Yes, one safety related condition was reported in CY2015 on April 9, 2015. The operator was Florida City Gas and issue was four anomalies were located on a 12 inch pipeline. Operating pressure on the pipeline was lowered and operator is scheduling to replace the pipeline in CY2016. FL PSC will be observing the replacement of the pipeline when notified.

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- |           |   |   |   |
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| <b>22</b> | Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns?<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|
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Evaluator Notes:

Yes, this item is checked on the standard inspection and reviewed on the annual report submitted by the operators. No areas of concerns.

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

Yes, FL PSC responses to all NAPSRS and PHMSA survey as confirmed by Robert Clarillos, NAPSRS Administrative Manager.

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|-----------|--|---|---|
| <b>24</b> | 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.<br>No = 0 Needs Improvement = .5 Yes = 1 | 1 | 1 |
|-----------|--|---|---|
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Evaluator Notes:

No waivers or special permits are on file with PHMSA pertaining to this item.

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|-----------|---|---|---|
| <b>25</b> | Did the state attend the National NAPSRS Board of Directors Meeting in CY being evaluated?<br>No = 0 Needs Improvement = .5 Yes = 1 | 1 | 1 |
|-----------|---|---|---|
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Evaluator Notes:

Yes, Rick Moses attended the NAPS National Meeting in Tempe, AZ on Sept 1-4, 2015.

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- |           |   |                                      |  |
|-----------|---|--------------------------------------|--|
| <b>26</b> | Discussion on State Program Performance Metrics found on Stakeholder Communication site - <a href="http://primis.phmsa.dot.gov/comm/states.htm">http://primis.phmsa.dot.gov/comm/states.htm</a><br>No = 0 Needs Improvement = 1 Yes = 2 | 2                                    | 2  |
| a.        | Discussion of Potential Accelerated Actions (AA's) based on any negative trends   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b.        | NTSB P-11-20 Meaningful Metrics   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

- a. Reviewed with Rick Moses, Program Manager, PHMSA's website as it pertains to the State of Florida pipeline safety program performance metrics. Discussed downward trend in damages per 1,000 locate tickets and suggested he attend future FL Sunshine One call meetings to monitor this trend. Reviewed gas distribution system leaks chart and noted an upward trend in the number of leaks repaired per 1,000 miles. This item will be discussed with staff members and may be included in future inspection visits with operators. Mr. Moses established a site link from FL PSC to PHMSA State Program Metrics website after this discussion.
- b. Reviewed the importance of the meaningful metrics and how this relates to NTSP P-11-20 document. Again stressed the importance of trends and monitoring data in making changes in existing pipeline safety program when trends change.

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- |           |                       |           |
|-----------|-----------------------|-----------|
| <b>27</b> | General Comments:     | Info Only |
|           | Info Only = No Points | Info Only |

Evaluator Notes:

No loss of points occurred in this section of the review.

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



## PART D - Compliance Activities

Points(MAX) Score

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1<br>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:

- a. Reviewed FL PSC Standard Operating Procedures and noted description of this requirement is listed in SOP 1123, D. OPERATOR VIOLATION NOTICE PROCEDURES: 3. A cover letter identifying the violation and title of the violation rule is attached to the inspection files from the field inspector and sent to an officer or CEO of a private company (Mayor or City Manager for municipalities).
- b. This procedure is listed in section 7. Monthly reports are generated from support staff to monitor responses. and 8. Once a response is received from the operator, the field inspector will re-inspect to ensure appropriate corrective action is taken.

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | 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<br>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.       | Document probable violations   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c.       | Resolve probable violations  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d.       | Routinely review progress of probable violations   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e.       | Were applicable civil penalties outlined in correspondence with operator(s)  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

### Evaluator Notes:

- a. Yes, randomly reviewed compliance letters sent to operators in CY2015 and confirmed they were mailed to company officer or manager. No issues.
- b. Randomly selected and reviewed inspection reports and found probable violations were documented correctly.
- c. Inspection reports and database confirm probable violations were resolved within a reason time by the operator and reviewed by the inspector.
- d. Yes, probable violations are reviewed monthly by program manager and inspector.
- e. Yes, a review of compliance letters to company officers found in the last paragraph of the letter the following wording, "Failure to not take corrective action may result in a penalty of \$25,000 per day for each day that the violation exists, up to \$500,000 for related violations as provided in 368.061 F.S."

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

### Evaluator Notes:

- Yes, reviewed CY2015 inspection reports and found fifty-two written compliance letters were sent to operators pertaining to non-compliance with the pipeline safety regulations. Letters and attached inspection reports listed the violations found.

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

### Evaluator Notes:

- Yes, operators are given the option to request a hearing with the FL PSC via legal counsel if the violation(s) can not be corrected within a reasonable time schedule with the program manager.

- |          |   |   |   |
|----------|---|---|---|
| <b>5</b> | 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)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

Yes, a good example of this requirement is in TECO Docket number 150259-GU. In this docket, a civil penalty of \$3 million was assessed and collected for violations of the pipeline safety regulations.

---

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

Evaluator Notes:

Yes, TECO docket number 150259-GU demonstrates FL PSC is using their enforcement fining authority.

---

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

Evaluator Notes:

No loss of points occurred in this section of the review.

---

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:

Yes, this item is address in FL PSC Standard Operating Procedures 1122.

- 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:

a. Yes, FL PSC requires all operators to telephonically notify Program Manager or Region Pipeline Safety Inspector when an incident occurs. A change in staff or annually, operators are provided with contact personnel and telephone numbers to use during and after normal work hours when an incident occurs.

b. Yes, reviewed with Program Manager the information contained in Appendix D & E located in the Guidelines for States Participating in the Pipeline Safety Program. He is familiar with the requirements of the document.

- 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:

Yes, if a decision was made to not go to perform the investigation, information is required to be reported in Standard Operating Procedures 1122 and on GS-10 form located on page 3.

- 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:

One incident was thoroughly investigated and contributing factors were mentioned. The second incident was not investigated but a decision to not go to the site was reported. Both incident reports were filed with the FL PSC by the operators.

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

Yes = 1 No = 0

Evaluator Notes:

No compliance action or violations were found during the incident investigations or review of the incident reports filed by the operators.

- 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:

Yes, FL PSC staff found the incident report submitted by Florida City Gas on May 10, 2015 had an incorrect damage amount. Working with PHMSA Southern Region and the operator, an amendment filing was submitted by the operator.

---

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

Evaluator Notes:

During the NAPS Southern Region meeting, Rick Moses shared information on the incident that occurred on Florida City Gas facilities. No areas of concerns.

---

8 General Comments:  
Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

No loss of points occurred in this section of the review.

---

Total points scored for this section: 11  
Total possible points for this section: 11



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

Evaluator Notes:

Yes, FL PSC inspectors review this information during the standard evaluation of the operator. This item is listed on page 4 under 192.614, item number 6 of form GS-3.

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

Evaluator Notes:

Yes, this item is reviewed with the operator during the inspection performed by the pipeline safety inspector on GS-3 form, page 4 section 192.614.

- |   |  |   |   |
|---|--|---|---|
| 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.)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, Program Manager has participated in discussions about changes in FL State Damage Prevention law and damages that occur on underground facilities. FL PSC is a member of CGA and actively promotes the CGA Best Practices.

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

Evaluator Notes:

Yes, FL PSC reviews trends on the number of damages per 1,000 locate request and maintains the data for review by inspectors. In the past, trends on damages have been provided in the agency's Annual Pipeline Safety Report to the Commissioners.

- |   |  |           |           |
|---|--|-----------|-----------|
| 5 | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

No loss of points occurred in this section of the review.

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



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

Name of Operator Inspected:

TECO Peoples Gas

Name of State Inspector(s) Observed:

Farhan Alnajjar, Engineering Specialist & Hassan Badran

Location of Inspection:

Tampa, Florida

Date of Inspection:

June 13-16, 2016

Name of PHMSA Representative:

Glynn Blanton, PHMSA State Programs

Evaluator Notes:

The evaluation was conducted on Farhan Alnajjar and Hassan Badran. Mr. Farhan was the lead inspector and Mr. Badran was the previous inspector who conducted the inspection last year. The following TECO individuals were contacted and participated in the four day inspections:

Michelle Eastley Division Manager

Jessica Pijuan Compliance Work Coordinator

Cyndi Grimard Supervisor Services

Chris Furlow Senior Utility Tech

Ron Wood Senior Utility Tech

Eddie Walsh Supervisor Distribution

Kenny Bryant Senior Utility Tech

Justin Smith Utility Tech

Javi Vazquez Sr. Utility Tech

David Williams Gas Operations Tech

Dustin Donahoo Utility Tech

Mike Thompson Corrosion Coordinator

Kenny Matthews Supervisor Construction Services

- 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:

Yes, Michelle Eastley, TECO Division Manager, was contacted by Farhan Alnajjar, FL PSC Engineer, in April, 2016 about the proposed standard inspection that would be performed.

- 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:

Yes, Farhan Alnajjar used FL PSC GS-14 form during the inspection. Field notes and cathodic protection and odorant readings taken during the field inspections were transferred to FL PSC standard inspection form.

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

Evaluator Notes:

Yes, Mr. Alnajjar was thoroughly documenting all items observed and checked the work performed by TECO employees at the regulator stations pertaining to lock up, over pressure protection and set points. During the emergency valve inspection, he recorded access to valves and ability of company personnel to turn the valves correctly. It was observed during the cathodic protection and odorant inspections, Mr. Alnajjar recording CP and odorant readings into the FL PSC forms. Consultation about items observed and noted was shared with Hassan Badran.

- 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:

Yes, verification of the operator's equipment was a check list item Mr. Alnajar used before each task being performed by the operator. He reviewed the pipe-to soil potential and odorant equipment to insure it was calibrated prior to the equipment being used. Additionally, Mr. Alnajar reviewed TECO's written procedures to insure the employees performed the covered tasks were following the operator's procedures and were operator qualified.

- 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:

Yes, Mr. Alnajar verified TECO's written procedures and records prior to the field portion of the inspection. During the field portion of the inspections. Mr. Alnajar asked questions to the technician pertaining to odorant sampling and cathodic protection readings and results. If a question about a reading was of concern, he consulted with Hassan Badran, FL Engineering Specialist.

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

Evaluator Notes:

Yes, Mr. Farhan Alnajar has completed the seven basic courses at TQ and qualified to inspect natural gas systems for compliance with the MFSS. He attended the boot camp courses in 2016. He is a civil engineer and has many years of experience in engineering design and operations.

- 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) 1 1  
Yes = 1 No = 0

Evaluator Notes:

Yes, Mr. Alnajar consulted an tentative exit interview with TECO employees during the field inspections. The final exit interview was scheduled to occur the following week of this field inspection. Several potential areas of concerns or violations were found and will be discussed with the operator prior to the draft report being sent to FL PSC Program Manager Rick Moses.

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

Evaluator Notes:

Yes, a tentative exit interview was conducted at the end of each day. However, an official final exit interview with company representatives was scheduled to occur on or after June 24, 2016.

- 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 Info Only  
Info Only = No Points

- a. Abandonment ☐  
b. Abnormal Operations ☐  
c. Break-Out Tanks ☐  
d. Compressor or Pump Stations ☐  
e. Change in Class Location ☒

f.	Casings	<input checked="" type="checkbox"/>
g.	Cathodic Protection	<input checked="" type="checkbox"/>
h.	Cast-iron Replacement	<input checked="" type="checkbox"/>
i.	Damage Prevention	<input checked="" type="checkbox"/>
j.	Deactivation	<input type="checkbox"/>
k.	Emergency Procedures	<input checked="" 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 checked="" type="checkbox"/>
o.	Leak Surveys	<input checked="" type="checkbox"/>
p.	MOP	<input checked="" 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 checked="" 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 checked="" type="checkbox"/>
H.	Compliance Follow-up	<input type="checkbox"/>
I.	Atmospheric Corrosion	<input checked="" type="checkbox"/>
J.	Other	<input type="checkbox"/>

Evaluator Notes:

Aboveground pipe survey areas reviewed: SAS River & Coquimba, Hopewell Road, Anderson Road, Bullard Parkway, North Nebraska Avenue, Thatcher & Kirby, Fowler & Fletcher and Maydell Drive.

Gate Station Inspections performed were at the following locations: East Gate, Brandon Gate, County Line Road, Brooksville Gate Station & Tampa Northwest.

Cathodic protection and rectifier readings inspections were performed as follow: Brandon Rectifier, Temple Terrace, County Line Road, N. Central Avenue and Taliaferro Avenue.

Odorant levels and readings were taken at the following locations;

8701 W Hillsborough, US 54 @ Ivy Lakes Estates, Connorton @ Publix, 19850 Southern Hills Blvd, N Main Street, 14556 Ponce de Leon Blvd, 13100 Fort King Road, State Route 56 & Meadow Point Blvd, and Grand Oaks Pressure Point.

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

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

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

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

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

Evaluator Notes:  
NA

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

Evaluator Notes:  
NA

- |          |   |   |    |
|----------|---|---|----|
| <b>3</b> | Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:  
NA

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

Evaluator Notes:  
NA

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

Evaluator Notes:  
NA

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

Evaluator Notes:  
NA

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>7</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:  
NA

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