



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

MAINE PUBLIC UTILITIES COMMISSION

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: Maine

Agency Status:

Date of Visit: 07/12/2016 - 07/14/2016

Agency Representative: Gary Kenney, P.E., Gas Safety Manager

PHMSA Representative: Don Martin

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

Name/Title: Mark Vannoy, Chairman

Agency: Maine Public Utilities Commission

Address: 18 State House Station

City/State/Zip: Augusta, Maine 04333

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
4	4
8	8
11	11
0	0
0	0

TOTALS

111 111

State Rating

100.0

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

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

Evaluator Notes:

The operator information in the Pipeline Data Mart was reviewed and compared to the summary information in Attachment 1. No differences were found.

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

Evaluator Notes:

The documentation on inspection person days was reviewed. The MPUC's spreadsheet on inspection activities provided the information to verify the entries on Attachment 2.

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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 | 1 |
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Evaluator Notes:

The inspection units totaled on Attachment 1 matched the totals on Attachment 3. The unit information by operator was supported by MPUC documentation.

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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 |
|----------|--|---|---|

Evaluator Notes:

There were no incidents listed in Attachment 4. A search in the Pipeline Data Mart did not show any incidents for Maine in CY2015.

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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:

No accuracy issues were found. Compliance information was supported by MPUC documents.

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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:

No improvement issues identified from a review of the MPUC hard copy files. The MPUC maintains most files list in Attachment 6 in electronic files. No issues with electronic files.

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

No issues were identified with listing of employees. Training records were downloaded from PHMSA Training and Qualifications SABA database.

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

Evaluator Notes:

The entries in Attachment 8 were supported by state statutes or commission rules.

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:

There was adequate detail of the MPUC's program in Attachment 10. No improvements were noted.

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

Evaluator Notes:

The MPUC generally complied with the requirements of Part A of this evaluation. No points were deducted.

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:

Appendix C, Section C, of the MPUC Gas Safety Program Procedures includes the general Pre-Inspection, Inspection, and Post Inspection Activities which are incorporated for all inspection types. Appendix C also contains a listing of the inspection types, including Standard Inspections, and the frequency for conducting the inspections.

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

Appendix C, Section C, of the MPUC Gas Safety Program Procedures includes the general Pre-Inspection, Inspection, and Post Inspection Activities which are incorporated for all inspection types. Appendix C also contains a listing of the inspection types, including IMP and DIMP Inspections, and the frequency for conducting the inspections.

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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:

Appendix C, Section C, of the MPUC Gas Safety Program Procedures includes the general Pre-Inspection, Inspection, and Post Inspection Activities which are incorporated for all inspection types. Appendix C also contains a listing of the inspection types, including OQ Inspections, and the frequency for conducting the inspections.

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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:

Appendix C, Section C, of the MPUC Gas Safety Program Procedures includes the general Pre-Inspection, Inspection, and Post Inspection Activities which are incorporated for all inspection types. Appendix C also contains a listing of the inspection types, including Damage Prevention Inspections, and the frequency for conducting the inspections. Damage Prevention inspections are also conducted by the MPUC Damage Prevention Staff per the Chapter 895 Rule.

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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:

MPUC Gas Safety Staff participated in the New England Pipeline Safety Seminar held at Mt. Snow, VT on October 20 & 21, 2015. These seminars are conducted annually in conjunction with TQ and are reference in Section 9 of the MPUC Gas Safety Program Procedures, as well as included on the annual inspection plan (see Attachment 1 to Appendix C of the Procedures). The MAINE PUC will be hosting the 2016 seminar.

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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:

Appendix C, Section C, of the MPUC Gas Safety Program Procedures includes the general Pre-Inspection, Inspection, and Post Inspection Activities which are incorporated for all inspection types. Appendix C also contains a listing of the inspection types, including Construction Inspections, and the frequency for conducting the inspections. The MPUC has a rule whereby operators must notify the MPUC of construction activity on a weekly basis.

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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:

The process for developing the inspection plan is located in Appendix C of the MPUC Gas Safety Program Procedures. Section A of Appendix C provides the background and foundation of the inspection program. Section B of the Appendix discusses both planned and risk-based inspections, including the elements considered when planning inspections annually. Appendix A of the Procedures includes a breakdown of inspection units.

8 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues were found with the MPUC's procedures. The MPUC has generally complied with the requirements of Part B of this evaluation. No points were deducted.

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):
253.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 2.50 = 550.00

Ratio: A / B
253.00 / 550.00 = 0.46

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

Evaluator Notes:

The MPUC exceeded the minimum inspection day requirement with a ratio of 0.462.

- 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

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

Training requirement for the required classes have been accomplished by Gary and Nathan. Shawn is on track to complete classes within required time frame.

- 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. Gary Kenny has completed training and has a good understanding of PHMSA's requirements for State Pipeline Safety Programs.

- 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:

The August 10, 2015 letter from Zach Barrett, to MPUC Chairman Mark Vannoy did not require a response.

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

Evaluator Notes:

The MAINE PUC will be hosting the 2016 seminar. The last seminar was held in 2015 in conjunction with the New England Pipeline Safety Seminar held at Mt. Snow, VT on October 20 & 21, 2015. These seminars are conducted annually in conjunction with TQ and are reference in Section 9 of the MPUC Gas Safety Program Procedures, as well as included on the annual inspection plan (see Attachment 1 to Appendix C of the Procedures).

- 6 Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1 5 5

Yes = 5 No = 0 Needs Improvement = 1-4

Evaluator Notes:

The MPUC's progress to date is on track to complete all inspections within the timeframe established in its procedures. The procedures were revised two years ago to comply with the five year interval established in the Guidelines for States Participating in the Pipeline Safety Program two years ago.

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|---|--|---|---|
| 7 | Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? | 2 | 2 |
|---|--|---|---|

Chapter 5.1

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

The MPUC Gas Safety staff uses PHMSA forms for all inspection types for which forms are available. All portions of the forms applicable to the type of inspection being conducted are completed. Beginning in 2016, with few or no exceptions, PHMSA's IA is being utilized to build applicable inspection forms and completes the requirement to upload the results into certain PHMSA databases.

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|---|--|---|---|
| 8 | Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? | 1 | 1 |
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(NTSB) Chapter 5.1

Yes = 1 No = 0

Evaluator Notes:

Only one operator in Maine ? Unitil (Northern Utilities) ? has cast iron pipe in their system. Section I.2.4 of their O&M Procedure states the following:

(c) Cast Iron Piping

Check cast iron pipe for graphitic corrosion. Look for soft black spots underneath the scale and tightly bonded soil or corrosion product. This type of corrosion is attributed to the iron being selectively dissolved, leaving a porous mass consisting largely of graphite. The material remaining may appear intact but is relatively soft, and may be scraped or indented easily with a sharp instrument.

Each segment of cast iron or ductile iron pipe on which general graphitization is found to a degree where a fracture or leakage might result must be replaced.

Each segment of cast iron or ductile pipe on which localized graphitization is found to a degree where leakage might result, must be replaced, repaired, or sealed by internal sealing methods adequate to prevent or arrest any leakage.

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|---|--|---|---|
| 9 | Did the state review operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance) (NTSB) Chapter 5.1 | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0

Evaluator Notes:

Unitil (Northern Utilities) has a cast iron and bare steel model used for the ranking of pipe and the priority of its replacement. Unitil has not experienced failures involving circumferential cracking.

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| 10 | Did the state review operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21? (NTSB) Chapter 5.1 | 1 | 1 |
|----|---|---|---|

Yes = 1 No = 0

Evaluator Notes:

The MPUC covers this item as part of its O&M inspections.

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|----|--|---|---|
| 11 | Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 192.617? Chapter 5.1 | 1 | 1 |
|----|--|---|---|

Yes = 1 No = 0

Evaluator Notes:

A review of randomly selected inspection reports completed in 2015 revealed that this requirement has been accomplished.

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

Evaluator Notes:

The annual reports are reviewed for trends regarding cast iron and unprotected steel pipe (only one operator has them), mains and services, leaks, damages, and unaccounted for gas. Please see attached annual report summary and unaccounted for gas history.

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|-----------|---|---|---|
| 13 | 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.
Chapter 5.1
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

The results of eight OQ inspections were added to the database in 2015. Beginning in 2016, with few or no exceptions, PHMSA's IA is being utilized for all OQ, DIMP, and IMP 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 | 1 |
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Evaluator Notes:

The NPMS Public Viewer has been verified for Bangor Gas, Maine Natural Gas, Summit Natural Gas, Woodland Pulp.

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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:

In 2014 the Program Manager performed inspections to verify that Summit's, MNG's, and Unitil's Contractors were included in the Drug and Alcohol plan and inspected the Drug and Alcohol program for Woodland Pulp, LLC. All natural gas operators were last inspected for Drug & Alcohol compliance in 2013 utilizing PHMSA Form 13.

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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 |
|-----------|---|---|---|

Evaluator Notes:

MPUC Rule Chapter 420 ? 7.D.1.d requires that natural gas operators submit their OQ plans to the MPUC annually. The qualification of the operator's and contractor's personnel is verified each time tasks are observed during inspections. If the records are not available at the time of the inspection, they are either requested from the operator or obtained from the appropriate database.

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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:

The MPUC inspected Bangor Gas' IMP plan in 2014. The IMP plans of Summit Natural Gas and Woodland Pulp were inspected in 2015. Maine Natural Gas' transmission pipeline has no HCAs.

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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 have been complete by December 2014 | 2 | 2 |
|-----------|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

The DIMP plans of all LP operators were reviewed in 2014. Summit Natural Gas' distribution system went in service in 2014 and their DIMP plan was inspected in 2015. The DIMP plans of Bangor Gas, Maine Natural Gas, and Unitil were respectively inspected in 2014, 2013, and 2012.

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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 be conducted every four years per RP1162
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|
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Evaluator Notes:

The following are the years of the most recent Public Awareness inspections:

Bangor Gas: 2013 & scheduled for 2016

Maine Natural Gas: 2013

Summit Natural Gas: 2015

Unitil: 2012 & 2016

Woodland Pulp: 2015

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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:

The following methods of communication are utilized:

? Dissemination of Federal Register notices and other pertinent information to operators via e-mail. The program maintains operator distribution lists (LPG and Natural Gas) for dissemination of these notices.

? Information concerning gas safety regulations and contact information is available on the Commission website.

Enforcement cases are available to the public through the Commission's Case Management System.

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- | | | | |
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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 | 1 |
|-----------|---|---|---|
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Evaluator Notes:

There were no SRCs in 2015, nor were there any SRCs in previous years warranting follow-up in 2015.

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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:

MPUC Rule Chapter 420 ? 7.C. states "Each natural gas utility shall participate in the Plastic Pipe Data Collection and Sharing Initiative and report each discovered incident of plastic pipe failure as prescribed in the Initiative to the Maine Public Utilities Commission Gas Safety Manager, and The American Gas Association Plastic Pipe Ad Hoc Committee."

In addition, defective workmanship has been shown to be an issue with the installation of SNGME plastic distribution system. The MPUC has engaged in ongoing compliance activity ordering the investigation and remediation of these workmanship issues.

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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:

Upon numerous occasions through e-mail with NAPSRS and PHMSA. All such correspondence is archived in the Program Managers e-mail folders for NAPSRS and PHMSA.

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

Evaluator Notes:

On April 15, 2014, PHMSA provided a letter of no objection to the MPUC's special permit/waiver to granted to Unitil. However, the letter of no objection was qualified with several conditions which will require considerable follow-up by the MPUC. There was some follow-up activity by the MPUC since April 15, 2014 but it is not complete. The MPUC should place a high priority on this special permit to ensure the operator has completed all requirements of the conditions.

- 25 Did the state attend the National NAPS Board of Directors Meeting in CY being evaluated? 1 1
No = 0 Needs Improvement = .5 Yes = 1

Evaluator Notes:

The Program Manager hosted the 2015 NAPS Eastern Region meeting and attended the 2015 National meeting in Tempe, AZ. An Inspector, Sean Watson, also attended the 2016 NAPS Eastern Region meeting with the Program Manager. If the budget and staff availability permit, it is planned that an Inspector or Staff Attorney will also attend subsequent Eastern Region meetings.

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

Evaluator Notes:

Mr. Kenny was aware of the performance metrics. He reviews the information on PRIMIS but primarily relies on data on the metrics that his office maintains.

It was noticed during this discussion that Maine's damage prevention metrics are trending in a positive direction indicating an effective damage prevention program. Except for "Number of Leaks Repaired" all other metrics are trending in a positive direction. Mr. Kenny is aware of the leaks repaired metric and has analyzed possible causes of what appears to be an underperforming metric. An operator has changed the methodology in its count of leaks repaired when mains are replaced. This change has resulted in many additional leaks reported than in the past. Mr. Kenny expects the trend to improve in the future once the operator's change in methodology has minimal effects as time passes.

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

Evaluator Notes:

Question C.24 - On April 15, 2014, PHMSA provided a letter of no objection to the MPUC's special permit/waiver to granted to Unitil. However, the letter of no objection was qualified with several conditions which will require considerable follow-up by the MPUC. There was some follow-up activity by the MPUC since April 15, 2014 but it is not complete. The MPUC should place a high priority on this special permit to ensure the operator has completed all requirements of the conditions.

The MPUC has generally complied with the requirements of Part C of this evaluation.

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

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:

Appendix D of the MPUC Gas Safety Program Procedures addresses compliance action procedures, including notification of company officers and compliance tracking and follow-up.

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|----------|--|--------------------------------------|--|
| 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. | 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:

Compliance actions are tracked by MPUC Gas Safety Program Staff on a spreadsheet. Upon review of a random sample of inspection reports completed during 2015 no instances were identified where the MPUC did not comply with the requirements of Question D.2 of this evaluation. Numerous examples of compliance actions from 2015, including those with civil penalties were available.

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

Evaluator Notes:

Compliance actions may include both informal and formal action when conducted in accordance with MPUC Gas Safety Program Procedures, Appendix D. As noted in the Question D.2, numerous examples of compliance actions from 2015 are available.

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

Operators are afforded multiple opportunities to respond to compliance actions through mechanisms listed in the MPUC Gas Safety Program Procedures as well as the MPUC Rule Chapters 420 and 421. No show cause hearings were necessary in 2015.

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

Yes, the program manager provided examples of violation considerations that would warrant seeking civil penalties. Although not occurring in 2015, the NOPV referenced above in Question 2 is an example of a civil penalty commensurate with a repeat violation, considering severity. In addition to the penalty, the operator was required to investigate their system for additional damages.

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:

The following dockets and penalty amounts verifies that the MPUC is using its enforcement authority.

2015-00343 - \$1,000

2015-00344 - \$5,000

2015-00349 - \$7,500

2015-00364 - \$8,000

Total of \$24,750

7 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

The MPUC has generally complied with the requirements of Part D of this evaluation.

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:

The MPUC provides Incident Investigation Procedures in Appendix E of its Gas Safety Program Procedures. A review of Appendix E indicates that the procedures are adequate.

- 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:

The MPUC is aware of the information contained in Appendix D and E of the Guidelines for States Participating in the Pipeline Safety Program. The MPUC's procedures contain language about participation with NTSB and PHMSA in Appendix E of the procedures.

Operators are required to notify Commission Staff in some cases, including incident reporting, per MPUC Chapter 130 requirements. No incidents were reported to MPUC in 2015 that warranted investigation.

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

Evaluator Notes:

There were no reportable incidents during CY2015; therefore, this question is not applicable.

- 4 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? 3 NA
Yes = 3 No = 0 Needs Improvement = 1-2

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

Evaluator Notes:

There were no reportable incidents during CY2015; therefore, this question is not applicable.

- 5 Did the state initiate compliance action for violations found during any incident/accident investigation? 1 NA
Yes = 1 No = 0

Evaluator Notes:

There were no reportable incidents during CY2015; therefore, this question is not applicable.

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

Evaluator Notes:

There were no reportable incidents during CY2015; therefore, this question is not applicable.

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

Evaluator Notes:

There were no reportable incidents during CY2015; therefore, this question is not applicable.

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

Evaluator Notes:

There were no reportable incidents during CY2015; therefore, some questions are not applicable. For the two questions that were applicable, the MPUC generally complied with PHMSA's requirements.

Total points scored for this section: 4
Total possible points for this section: 4



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:

This is a requirement of MPUC Rule Chapter 420 and its incorporation in Operators' O&M Procedures is verified during inspections. Likewise, Ch. 420 includes the requirement to have procedures to prevent cross bores.

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

The Dig Safe ticket number (indicating notification) is verified during construction inspections for work by the operator and their contractors. Random, unannounced construction site visits, by the Damage Prevention Investigators, verify marking and positive response.

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

The CGA Best Practices are promoted through training by the MPUC's Damage Prevention Investigators and the annual training by Maine's Managing Underground Safety Training (MUST) Committee, in which the MPUC actively participates. The CGA Best Practices are also referenced in ?3.B.a. of MPUC Rule Chapter 420, SAFETY STANDARDS FOR NATURAL GAS AND LIQUEFIED NATURAL GAS FACILITY OPERATORS, regarding the qualification of pipeline locating personnel.

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

The Damage Prevention Investigators maintain a spreadsheet of all underground facility incidents; including those resulting in no damage. For gas pipelines, the damages per 1,000 tickets are tracked from the annual distribution reports to PHMSA. The damages per 1,000 tickets have respectively been 2.04, 1.77, 1.67, 1.54, and 1.86 for 2011 through 2015.

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

Evaluator Notes:

The MPUC has generally complied with the requirements of Part F of this evaluation.

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:
Summit Natural Gas of Maine and Unitil

Name of State Inspector(s) Observed:
Nathan Dore

Location of Inspection:
Yarmouth, ME and Portland, ME

Date of Inspection:
07/14/2016

Name of PHMSA Representative:
Don martin

Evaluator Notes:

Design, Testing and Construction Inspection was conducted at two locations on two different operators. Summit Natural Gas was installing new distribution main near Yarmouth, ME and Unitil was replacing cast iron main with PE in Portland, ME.

- 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:

The MPUC is provided with construction notifications on a weekly basis as required in its rules. Operators are well aware that the MPUC will conduct construction inspections without prior notice. The MPUC provides notice on all types of inspections.

- 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. Pipeline construction checklists, developed by the MPUC, were utilized for the two construction projects. The checklist is an application located on the inspector's Apple Ipad. The inspector enters results into the checklist as he progressed through the inspections.

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

Evaluator Notes:

Yes. As noted in the previous question these results were entered on the job-site. There was no need to keep notes and then transfer once back in the office. It was done real time in the field.

- 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, all installation equipment or equipment used for testing was reviewed and checked for its appropriateness and for calibration records if they were required.

- 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 | <input checked="" type="checkbox"/> |
| b. Records | <input checked="" type="checkbox"/> |
| c. Field Activities | <input checked="" type="checkbox"/> |
| d. Other (please comment) | <input type="checkbox"/> |

Evaluator Notes:

The inspections were construction inspections. The operators were requested to provide copies of all written procedures and other material that is required to be on a construction jobsite. Records of individuals OQ certifications were reviewed.

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

Evaluator Notes:

The inspector has completed all of the required courses at PHMSA's Training and Qualifications Division. The inspector was well versed in pipeline safety regulations pertaining to design, testing and construction of pipelines. No issues identified.

- | | | | |
|---|---|---|---|
| 8 | Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation)
Yes = 1 No = 0 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

Yes, stated no issues were identified during the visit.

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

Evaluator Notes:

No probable violations were identified.

- | | | | |
|----|---|-----------|-----------|
| 10 | General Comments: 1) What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) 2) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) 3) Other.
Info Only = No Points | Info Only | Info Only |
|----|---|-----------|-----------|

- | | | |
|----|-----------------------------------|-------------------------------------|
| a. | Abandonment | <input type="checkbox"/> |
| b. | Abnormal Operations | <input 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 checked="" 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 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 checked="" type="checkbox"/> |
| t. | Navigable Waterway Crossings | <input type="checkbox"/> |
| u. | Odorization | <input type="checkbox"/> |
| v. | Overpressure Safety Devices | <input type="checkbox"/> |
| w. | Plastic Pipe Installation | <input checked="" type="checkbox"/> |
| x. | Public Education | <input type="checkbox"/> |
| y. | Purging | <input 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 type="checkbox"/> |
| E. | Vault Maintenance | <input type="checkbox"/> |
| F. | Welding | <input type="checkbox"/> |
| G. | OQ - Operator Qualification | <input checked="" type="checkbox"/> |
| H. | Compliance Follow-up | <input type="checkbox"/> |
| I. | Atmospheric Corrosion | <input type="checkbox"/> |
| J. | Other | <input type="checkbox"/> |

Evaluator Notes:

The inspections involved the review of design, testing and construction of PE plastic mains and service lines. Operator qualification records of individuals were reviewed in case operation and maintenance tasks were performed during the construction.

The inspections were conducted in a thorough manner and results were well documented.

There no issues identified in regards to the requirements of Part G of this evaluation.

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



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:

The MPUC 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:

The MPUC 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:

The MPUC 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:

The MPUC 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:

The MPUC 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:

The MPUC 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:

The MPUC is not an interstate agent.

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

Evaluator Notes:

The MPUC 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:

The MPUC does not have a Section 60106 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:

The MPUC does not have a Section 60106 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:

The MPUC does not have a Section 60106 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:

The MPUC does not have a Section 60106 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:

The MPUC does not have a Section 60106 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:

The MPUC does not have a Section 60106 agreement with PHMSA.

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

Evaluator Notes:

The MPUC does not have a Section 60106 agreement with PHMSA.

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