



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

MA DEPT. OF PUBLIC UTILITIES

### 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:** Massachusetts

**Agency Status:**

**Date of Visit:** 06/27/2016 - 06/29/2016

**Agency Representative:** Richard Wallace, Director, Pipeline Engineering and Safety Division  
Phillip Denton, Assistant Director, Pipeline Engineering and Safety Division

**PHMSA Representative:** David Lykken, Transportation Specialist

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

**Name/Title:** Angela M. O'Connor, Chairman

**Agency:** Massachusetts Department of Public Utilities

**Address:** One South Street

**City/State/Zip:** Boston, MA 02110

**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

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

### Possible Points Points Scored

10	9
13	12
49	45.5
15	14
10	10
8	8
12	12
0	0
0	0

### TOTALS

117 110.5

### State Rating

94.4

## PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- |          |   |   |     |
|----------|---|---|-----|
| <b>1</b> | Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 0.5 |
|----------|---|---|-----|

Evaluator Notes:

Improvement from last year. Repeat error for entry under "State Agency Jurisdiction/Agent Status" - Operator Type "Distribution-Other". Coded 'F' for "State is not an Interstate agent". Should be coded as X/60105. Will submit correction.

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

Evaluator Notes:

Days appear to be accurate. Increase of 159 days devoted to Standard Comprehensive inspections in CY2015 from CY2014. Compliance Follow-up activities typically done as part of next standard inspection. Some difficulty tracking Follow-up Days back to original inspection/enforcement action. Noted as area needing improvement under Part D - Compliance Activities, Question 2d.

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|----------|--|---|---|
| <b>3</b> | 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:

Appears to be accurate. No issues noted.

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|----------|--|---|---|
| <b>4</b> | 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. Incident report information mirrors PDM content. One minor entry error. NRC ID #1113473 - Date of Incident should be 2/19/2015 not 1/19/2015. Submitted for correction in Progress Report.

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

Evaluator Notes:

Count appears to be accurate. No issues noted.

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

Evaluator Notes:

Transition year in CY2015 to new "Pipeline Data Management System. Shift to new database occurred at the end of June 2015. Significant improvements. Overall no issues.

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| <b>7</b> | Was employee listing and completed training accurate and complete? - Progress Report Attachment 7<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 0.5 |
|----------|--|---|-----|

Evaluator Notes:

Minor corrections required under "% of Time" and "Months in Program" for persons who spent time as a Supervisor and Inspector/Investigator. Should be apportioned accordingly. Submitted for correction in Progress Report. No impacts to Total Inspection person-days/Total person day ratio. Training records appear to be complete.

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

Evaluator Notes:

Up to date. Automatic adoption of federal rules per state statute.

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

Evaluator Notes:

A change in program directors occurred in CY2015. An "Assistant Director" position was approved and the position filled.

A number of programmatic improvements have been completed and implemented. Others are currently under development. The program's written procedures have undergone a complete review with many revisions made to provide the inspector and administrative personnel with more comprehensive and detailed processes for conducting inspections, training, enforcement, and administration of the pipeline program. Correspondence templates were created to ensure consistency of enforcement actions taken.

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|-----------|--|-----------|-----------|
| <b>10</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

Evaluator Notes:

Improvements from last evaluation period. As part of exit interview noted to PM and senior administration present to be sure conduct a accuracy check of Progress Report entries prior to submittal.

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Total points scored for this section: 9  
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:**

MA-DPU General Inspection, Enforcement and Incident Investigation Procedures Manual. Revision 3.0. Section 9.4.2 "Comprehensive Inspections". Program has incorporated portions of written procedures example found in Appendix S of the PHMSA State Program Guidelines. Have added pre-inspection, inspection, and post-inspections elements that had not been previously addressed.

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

MA-DPU General Inspection, Enforcement and Incident Investigation Procedures Manual. Revision 3.0. Section 9.4.7 "Integrity Management Program Inspections" and Section 9.4.8 "DIMP Inspections". Have added pre-inspection, inspection, and post-inspections elements that had not been previously addressed.

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

MA-DPU General Inspection, Enforcement and Incident Investigation Procedures Manual. Revision 3.0. Section 9.4.4 "Training and Operator Qualification". Pre-inspection, inspection, and post-inspections elements have been incorporated.

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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:**

MA-DPU General Inspection, Enforcement and Incident Investigation Procedures Manual. Revision 3.0. Section 9.4.6 "Inspection of Damage Prevention Activities". Program has incorporated portions of written procedures example found in Appendix S of the PHMSA State Program Guidelines. Have added pre-inspection, inspection, and post-inspections elements that had not been previously addressed.

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

Yes = 1 No = 0 Needs Improvement = .5

**Evaluator Notes:**

MA-DPU General Inspection, Enforcement and Incident Investigation Procedures Manual. Revision 3.0. Section 9.4.5 "On-Site Operator Training". Incorporated established frequencies for scheduling on-site training.

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

MA-DPU General Inspection, Enforcement and Incident Investigation Procedures Manual. Revision 3.0. Section 9.4.3

"Design, Testing and Construction". Program has incorporated portions of written procedures example found in Appendix S of the PHMSA State Program Guidelines. Have added pre-inspection, inspection, and post-inspections elements that had not been previously addressed.

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	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 type="radio"/>	No <input type="radio"/> Needs Improvement <input checked="" 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:

Repeat issue from last year. MA-DPU General Inspection, Enforcement and Incident Investigation Procedures Manual. Revision 3.0. Section 8.0 "Annual Inspection Work Plan (IWP)". Program did incorporate such factors as data collected from operator annual reports, compliance history, and incident reports. Process is still missing a comprehensive list of risk factors, how they are weighed, and how the results will determine inspection priority.

The program is in the process of hiring a Data Analyst who's job function in part will be to review all data collected and develop a risk based inspection model for determining inspection priorities.

8 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Significant improvements made to the safety program's written procedures, in addition to incorporating a number of appendices to guide inspection and administrative staff and provide consistency within the program.

Total points scored for this section: 12  
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):  
822.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
220 X 7.98 = 1755.60

Ratio: A / B  
822.00 / 1755.60 = 0.47

If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0  
Points = 5

### Evaluator Notes:

No issues noted. Identified a couple IM field days where credit was taken for day's in field where the extent of the inspection activity was described as a "meet and greet" between operator compliance personnel and new MA-DPU inspection staff. Isolated event. Does not change ratio. Program Manager will address.

- 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:

Inspectors had required training to lead standard or specialized program inspections. No issues noted. Root Cause training: One inspector has attended and successfully passed. Three others including one supervisor scheduled to attend the August 2016 class.

- 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:

Only in director position for approximately 1 1/2 years but demonstrates adequate knowledge. Has made a number of changes to bring program into compliance with state program guidelines.

- 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. Evaluation letter sent 10/27/2015. Chairman's response received on 12/2/2015. Chairman did address all concerns. CY2015 program evaluation has identified a couple of repeats as still needing improvement but processes are in place to correct those deficiencies.

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

### Evaluator Notes:

Yes. 2015 seminar held in Stowe, VT in association with the NEPSR.

- |   |  |   |   |
|---|--|---|---|
| 6 | 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:

Appears to be in compliance. The transition in CY2015 to the new pipeline database will allow the program Director and Assistant Director to better track inspection activity going forward.

In addition, the MA-DPU has developed an Inspection Work Plan (IWP) as part of 5 year inspection work plan commencing in July of CY2016. The IWP was developed utilizing a risk-based priority scale to accommodate changes to the IWP during any given calendar year. Inspection planning will be administered in accordance with the divisions General Inspection Procedures currently ongoing revision.

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- |   |  |   |   |
|---|--|---|---|
| 7 | Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 1 |
|---|--|---|---|

Evaluator Notes:

Inspection forms incorporated into new pipeline safety database utilizing the PHMSA IA equivalent form format.

With the exception of a couple of stand out individuals, inspection forms filled out by inspection staff generally lack detail. They provided little to no content with respect to observations made in the field or other substantive comments essential to supporting the inspector's rational for determining compliance.

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

Evaluator Notes:

Yes. Pipeline Inspection form Type: Maintenance - Sub-Type: Corrosion

Reviewed completed inspection form used for inspection of Columbia Gas of Massachusetts dated 10/22/2015.

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

Evaluator Notes:

Yes. Also as noted previously, Operators required to conduct "Winter Surveys, provide regular operator updates and submit quarterly leak and status reports to the MA-DPU. Part of new Data Analyst position will be to review and monitor reports, identify trends and incorporate results into new risk model.

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

Evaluator Notes:

Yes. Inspection Form Type: Standard Comprehensive Sub-Type: Operation and Maintenance

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

Evaluator Notes:

Yes. Operators are to submit Incident analysis of accidents which are reviewed. Operators are also required to submit damage reports which are also reviewed and acted on when necessary. All gas operators are required to submit various leak reports detailing their activities.



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

Evaluator Notes:

Yes. In addition, operators must file annually a "MA-DPU Addendum to Form PHMSA F7100.1-1". Tracker used to confirm "DPU Filings" for the reporting year. Operators must provide copies of DOT Annual Reports, "Gate Box" (Valve inspections), CI Replacement, Inactive/Abandoned Facilities, Mechanical Fitting Failures, LNG Annual Fire Prevention, Emergency Response Plans, NMPS information. The new Data Analyst position, once filled, will be responsible for reviewing submitted information and providing analysis.

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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.<br>Chapter 5.1<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 1 |
|----|---|---|---|

Evaluator Notes:

Repeat issue from last year. One inspector did a good job inputting inspections into OQDB. For Gas TIMP inspections all forms not uploaded in a timely manner. Corrected during this program evaluation.

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|----|---|---|-----|
| 14 | 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 | 0.5 |
|----|---|---|-----|

Evaluator Notes:

Repeat from last year. Question not included in inspection checklists. No confirmation. MA-DPU sends a letter annually to operators reminding them of their responsibility to submit required reports. In 2015 they included submittal of NPMS data but did not make it clear in the correspondence that this information needed to go directly to the NPMS.

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

Evaluator Notes:

No issues. MA-DPU conducted 12 D&A inspections in 2015.

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

Evaluator Notes:

No issues. Field verification being completed but inspectors need to do a better job uploading PHMSA Form 15 (Protocol 9) inspection forms into the OQDB. Noted as needing improvement under question C-13.

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

Evaluator Notes:

Written plans reviewed not to exceed five years. There was an increase in days in CY2015 devoted to field validation. Reemphasized the need to conduct regular field verification of operator remediation activities.

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- |    |  |   |   |
|----|--|---|---|
| 18 | 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. Written plans reviewed not to exceed five years. Reemphasized the need to conduct regular field verification of operator remediation activities. A lot of this conducted under construction inspections with an emphasis on Cast Iron and Bare Steel replacement programs.

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

Evaluator Notes:

Yes. Last round of effectiveness inspections completed in 2013.

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

Evaluator Notes:

Pipeline safety information posted on MA-DPU web site. Information regarding Gas Safety, Jurisdictional Authority, Pipeline Safety regulations, Incident Reports, Enforcement Data, Dig Safe information, and "Enhancement Plans/Orders" detailing approved Cast Iron/Bare Steel Replacement plans. Division Director also conducts regular meetings with pipeline operators to discuss issues and concerns.

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|----|---|---|----|
| 21 | 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 | NA |
|----|---|---|----|

Evaluator Notes:

No SRC's reported in 2015. None outstanding prior to 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?<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----|---|---|---|

Evaluator Notes:

Inquired during monthly/Quarterly meeting with operators and as part of meetings with the MA Gas Advisory Council which include operator regulatory compliance officials.

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

Evaluator Notes:

Yes. Reviewed email response to NAPS and PHMSA requested surveys.

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| 24 | If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate.<br>No = 0 Needs Improvement = .5 Yes = 1 | 1 | 0 |
|----|--|---|---|

Evaluator Notes:

No follow-up performed. Several active waivers primarily related with PE inserted into steel casings on bridge crossings. None new issued in 2015. Waiver process detailed under Section 5.2 of the division's General Inspection Procedures manual.

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

Evaluator Notes:

Yes. The Division Director attended the national meeting held in Tempe, AZ.

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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:

Discussed performance metrics. The MA-DPU metrics appeared to be at reasonable performance levels. The high number of leaks repaired and #of Hazardous leaks repaired per 1000 miles are indicative of the ongoing CI and Bare Steel replacement programs. The resulting payoff is in the average number of outstanding leaks trending downward since CY2012.

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

Evaluator Notes:

The program is moving in the right direction having implemented a number of improvements. Providing administrative and inspector personnel with a revised and uniform set of guidelines and procedures for conducting thorough and effective inspections, hiring additional staff to assimilate collected data, and developing mechanisms for accurately tracking inspections. All to ensure consistency within the program and provide the public with a greater level of safety.

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Total points scored for this section: 45.5  
Total possible points for this section: 49



## 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:

Yes. Procedure for Enforcement & Compliance found under Section 10.0 of the Division's General Inspection Procedure manual.

- |          |  |                                      |   |
|----------|--|--------------------------------------|---|
| <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                                    | 3   |
| 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 type="radio"/>            | No <input checked="" 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:

Program does a good job documenting probable violations. As noted before inspectors make good use of photographic evidence as part of their final reports.

Discussed the need to further developed procedures and processes for conducting and documenting follow-up inspections including a formal process for closing out and communicating with the operator once the company has complied with any Consent Orders, Compliance Agreements, or Remedial Orders or other mechanism where Probable Violations have been identified. Subject to inspection staff's validation of remedial actions taken by the operator.

- |          |  |   |   |
|----------|--|---|---|
| <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. Four compliance actions taken in CY2015.

- |          |   |   |   |
|----------|---|---|---|
| <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. Covered under Section 10.0 - Enforcement. A review of past enforcement actions are consistent with the programs written procedures.

- |          |   |   |   |
|----------|---|---|---|
| <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. The PM is well versed in the process for issuing civil penalties. Civil penalties are considered anytime a probable violation of federal or state pipeline safety regulations has been identified.

- 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. Civil penalties assessed in CY2015 totaled \$1.5 million. Penalties collected in CY2015 totaled \$135,000.00.

- 7 General Comments:  
Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

Total points scored for this section: 14  
Total possible points for this section: 15



## PART E - Incident Investigations

Points(MAX) Score

- 1 Does the state have written procedures to address state actions in the event of an incident/accident? 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. Section 12.0 (Investigation of Incidents) of the General Inspection, Enforcement, and Incident Investigation Procedures.

- 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:

Yes. Section 12.3 of GIP manual. 24Hr Telephonic Incident Notification number for receiving and responding to reports. Records of all notifications appear complete. Also Section 12.10 which notes the MOU between the NTSB and PHMSA. A copy of the MOU is included under Appendix N of the GIP manual.

- 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. DPU-PL-15 Form-001 Telephonic Incident Notification (TIN) Form used to document incident reports. Operators required to file a follow-up report to the Division within 7 days of the initial TIN report in order to close out the notification/incident. The inspector reviews each written report and investigate as required ensuring that the operator has responded properly and met all reporting requirements. Further action may be taken by the inspector if the situation requires further investigation or action by the operator.

- 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:

Incidents investigations are well documented. Inspection staff make excellent use of photographs as part of the incident investigation reports. Reports are thorough and complete.

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

Evaluator Notes:

No probable violations identified. No enforcement actions taken.

- 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, as necessary. Per Section 12.8 of GIP "The DPU will review 30 day

incident reports filed by local distribution companies with PHMSA. The DPU will also subsequently review to see if local distribution companies filed supplemental reports to PHMSA to reflect changes and updated information."

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

Evaluator Notes:

Yes as part of the NAPS SR Eastern Region - State of the State presentation and during the annual NAPS SR National meeting.

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

Evaluator Notes:

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



## PART F - Damage Prevention

Points(MAX) Score

- |   |  |   |   |
|---|--|---|---|
| 1 | Has the state reviewed directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies? NTSB<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, reviewed as part of a overall review of the operator's written O&M plan.

- |   |   |   |   |
|---|---|---|---|
| 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. Covered during standard inspections. Also, Dig Safe violation reports submitted to the agency are reviewed to identify probable violations and possible enforcement action as needed.

- |   |  |   |   |
|---|--|---|---|
| 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. Dig Safe training provided annually by the agency for excavator community. Information also posted on the MA-DPU web site.

- |   |  |   |   |
|---|--|---|---|
| 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. Monthly data tracker reviewed. Dig Safe Activity Reports required to be submitted by pipeline operators on a quarterly bases. State averaged 2.4 damages per 1000 miles of pipe for CY2015.

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

Evaluator Notes:

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:

National Grid (6/07), Liberty Utilities (6/08), Eversource (6/09)

Name of State Inspector(s) Observed:

Angela Motley (6/07), Danielle (Lloyd) Hayes (6/07 & 6/08), Paul Grieco (6/08), Glenn Lachance & Lauren Govoni (6/09)

Location of Inspection:

West Dennis, Westport, Somerset, Shewsbury, Marlborough

Date of Inspection:

June 7-9, 2016

Name of PHMSA Representative:

David Lykken

Evaluator Notes:

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

Evaluator Notes:

Yes. All three operators notified prior to site visits.

- 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:

MA-DPU Inspection forms utilized during evaluations: Service Line Inspection Form-Codes, Plastic Main Inspection Form, Dig Safe Mark Out Form. and PHMSA Form 15 (OQ Protocol 9). Forms up to date.

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

Evaluator Notes:

Yes. Inspector observations were well documented. Recorded findings noted under Question G9.

- 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. Inspectors observed fusion, mechanical compression type fitting, and pressure testing equipment. Fire extinguishers checked. Inspectors took photos of material specifications on fittings being used. On two occasions contractor had difficulty providing copies of written procedures for fusion of PE pipe and installation of mechanical PE service tee.

- 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:

Yes. Construction activity only observed during field visit. As noted earlier the contractors ability to access and in most

instances did not follow company written procedures was identified as an issue. Inspectors persisted and did not leave site until company of procedures were produced. Inspectors inquired both during and followed-up after field visits seeking additional records to complete their inspections.

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

Yes. Inspectors demonstrated adequate knowledge. Both new inspection staff have successfully completed the core T&Q causes and demonstrated a willingness to learn.

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

Yes. As noted prior exit interviews expressed both verbally on site and via correspondence to operators.

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

June 7: Operator: National Grid - Contractor: NEUCO. Main replacement project. Swan River Rd. 2" PE shallow depth (22") and replacement svc shallow (14") per company procedures. Contractor had difficulty accessing company fusion procedures via laptop. Procedure eventually produced was out of date (2012). National Grid inspector called to site was not aware that a newer revised edition (2016) was in effect. Contractor stripped out main until proper depth found. Will lower shallow section and redo service stub installation.

Spoonhill Road - Two replacement services. Location 1: Inserted service riser located within 11 inches of crawl space vent. No pipe supports installed. Location 2: Service regulator vent located five inches from final grade. Meter bottom in contact with ground.

Exit letter sent to operator on June 28 detailing inspection findings and notifying company it may be in violation of stated federal and state pipeline safety rules and may be subject to a compliance action.

June 8: Drift Road, Westport - Operator: Liberty Utilities - New construction service/open trench. Extension installed only. Proper bedding and backfill provided for PE pipe. Information provided concerning ongoing issue with history of leakage involving 1/2 inch Permaset curb valves. MA-DPU to follow up with operator.

Fourth Street, Somerset - Liberty Utilities - Main replacement project. Misalignment of 2-inch weld elbow at tie-in point identified. Butt weld cap pass shows indications of concavity (Out of spec). Generally poor welding practices per visual. New tie-in already gassed up. Welder did not have welding qualification card available for review. Fitting and questionable weld cut-out the next day and radiographed.

Issues identified. Company adopted NGA welding procedure specifications state "Insert Operator Name" rather than inserting company name. Welding out side of procedure specs. No record proving the qualification welding procedure. No detailed record of welder qualification test results. Company annual welder requalification procedure do not meet parameters required under 49 CFR Part 192.229.

Exit letter sent to operator on June 22 detailing inspection findings and notifying company it may be in violation of stated federal and state pipeline safety rules and may be subject to a compliance action.

Thursday, June 9: Point Road, Shrewsbury: New construction service. No Crew at site. Identified 2 other questionable meter sets in same development. One with meter bottom in contact with ground, the other installed in such a manner as putting undue stress on gas piping. Letter of Concern to be sent to operator.

Gordon St, Shrewsbury. Operator (Eversource) - Contractor (Devereaux). 2# replacement main and service test and tie-over. Questioned why not replacing existing Aldyl-A main found at tie-in points. Contractor asked company but decision made not to replace at this time. No other issues noted.

Hosmer Street, MAuborough - Operator (Eversource) - Contractor (Devereaux). Replacement main and service test and tie-overs. Contractor (Devereaux) tie-over existing 1/2" CTS Aldyl-A service to 6" IPS PE main. Added approx 20' of new PE stub. Questioned contractor why not replace Aldyl-A. Instruction given by operator to leave existing in ground.

On June 22, 2016 MA-DPU sent the operator an "Information Request" asking for additional information regarding manufacturing dates for Aldyl-A pipe installed at the above two locations and within the operator's entire service territory, and leak history records involving Aldyl-A pipe.

**10** General Comments: 1) What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) 2) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) 3) Other.

Info Only = No Points

- |                                      | Info Only                           | Info Only |
|--------------------------------------|-------------------------------------|-----------|
| a. Abandonment                       | <input type="checkbox"/>            |           |
| b. Abnormal Operations               | <input type="checkbox"/>            |           |
| c. Break-Out Tanks                   | <input type="checkbox"/>            |           |
| d. Compressor or Pump Stations       | <input type="checkbox"/>            |           |
| e. Change in Class Location          | <input type="checkbox"/>            |           |
| f. Casings                           | <input type="checkbox"/>            |           |
| g. Cathodic Protection               | <input 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 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 checked="" 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 checked="" 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 checked="" 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"/>            |           |

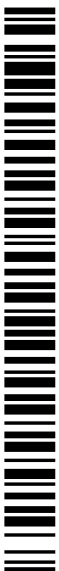
Evaluator Notes:

Inspectors did good job of noting observations during site visits and observed a number of questionable construction

installation practices that did not conform to company standards and procedures. Staff checked condition of crew equipment such as fusion gear, pressure testing devices, trench safety. Recorded pipe materials and fittings used at various sites. Checked accuracy of underground utility marks and requested dig tickets from contractor on site. Made good use of photographs as part of inspection documentation. Inspector did not pick up on the questionable weld found on Fourth Street in Somerset and instead was identified by the agency Director. The weld was cut out, radiographed. Issue primarily about the visual quality of the weld.

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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:

Not a interstate agent

- |          |   |   |    |
|----------|---|---|----|
| <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:

Not a interstate agent

- |          |  |   |    |
|----------|--|---|----|
| <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:

Not a interstate agent

- |          |   |   |    |
|----------|---|---|----|
| <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:

Not a interstate agent

- |          |   |   |    |
|----------|---|---|----|
| <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:

Not a interstate agent

- |          |  |   |    |
|----------|--|---|----|
| <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:

Not a interstate agent

- |          |   |   |    |
|----------|---|---|----|
| <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:

Not a interstate agent

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

Evaluator Notes:

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:

- |          |  |   |    |
|----------|--|---|----|
| <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:

- |          |  |   |    |
|----------|--|---|----|
| <b>3</b> | Were any probable violations identified by state referred to PHMSA for compliance?<br>(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:

- |          |   |   |    |
|----------|---|---|----|
| <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:

- |          |  |   |    |
|----------|--|---|----|
| <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:

- |          |  |   |    |
|----------|--|---|----|
| <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:

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

Evaluator Notes:

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