



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

1200 New Jersey Avenue SE  
Washington DC 20590

## 2014 Gas State Program Evaluation

for

NEW HAMPSHIRE 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)



# 2014 Gas State Program Evaluation -- CY 2014

Gas

**State Agency:** New Hampshire

**Agency Status:**

**Date of Visit:** 06/22/2015 - 06/26/2015

**Agency Representative:** Randy Knepper, Director Safety Division

David Burnell, Safety Specialist

Joseph M. Vercellotti, P.E. Utility Engineer

**PHMSA Representative:** Glynn Blanton, US DOT/PHMSA State Programs

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

**Name/Title:** Martin P. Honigberg, Chairman

**Agency:** New Hampshire Public Utilities Commission

**Address:** 21 South Fruit Street, Suite 10

**City/State/Zip:** Concord, New Hampshire 03301-2429

**Rating:**

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

## INSTRUCTIONS:

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2014 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. A deficiency in any one part of a multiple part question should be scored as needs improvement. Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual progress report attachments provide the basis for determining the state's pipeline safety grant allocation.

## Field Inspection (PART G):

The field inspection form used will allow different areas of emphasis to be considered for each question. Question 13 is provided for scoring field observation areas. In completing PART G, the PHMSA representative should include a written summary which thoroughly documents the inspection.

## Scoring Summary

### PARTS

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

9	9
13	13
43	43
15	15
4	4
8	8
12	12
0	0
0	0
<b>104</b>	<b>104</b>

### TOTALS

**State Rating** ..... **100.0**

# PART A - Progress Report and Program Documentation Review

Points(MAX) Score

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

**Evaluator Notes:**

Reviewed work papers, files and other related documents to confirm the information contained in Attachment 1 was correct. Verified the percentage of inspection units were performed in accordance written procedures and Attachment 1. The number of operators and inspection units match Attachment 3. One master meter operator remains in NH. No areas of concern.

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

**Evaluator Notes:**

Using NH PUC data base, a review of inspection days per inspector found the number of inspection day totals did match the number entered on Attachment 2. No areas of concern.

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

**Evaluator Notes:**

Reviewed and compared the list of operators in Attachment 3 to NH PUC's data base. We found all information was correct. In the note section of attachment 3, information on the addition and deletion of LPG operators were provided. Good information was provided for the reader.

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

**Evaluator Notes:**

No reportable incidents occurred in CY2014. NA

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

**Evaluator Notes:**

Reviewed Attachment 5 data on the number of carryover violations, violations found and corrected during CY2014. Number to be corrected at year end was found correct. Several civil penalties were assessed and collected in CY2014. In this regard, dollars assessed was \$51,500 and dollars collected was \$114,250.

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

**Evaluator Notes:**

Yes, files, data base and inspection reports were well organized and accessible. No issues.

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

**Evaluator Notes:**

A review of SABA transcript and training information posted in NH PUC Progress Report found all employees met the qualification requirements. No areas of concern.

- |   |   |   |   |
|---|---|---|---|
| 8 | 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:

NH PUC has automatically adoption of CFR Parts 191, 192, 193, 198 & 199 and civil penalty amounts. It was suggested in future filing of this information, they only need to mention NH PUC has automatic adoption of federal rules and penalties. No issues.

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

Evaluator Notes:

The program description was very detailed and informative about planned and long term goals of pipeline safety program. Excellent work. No issues.

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

Evaluator Notes:

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

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Total points scored for this section: 9  
Total possible points for this section: 9



## 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:

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections found this item is listed located on page 5, under Routine Inspections. All inspections will be performed at least every five years using Federal Form 2. Items pertaining to pre-inspection is located on page 10 under VIII Inspection Preparation & page 2, III Notice of Inspection; Inspection activities are addressed on page 2, III Notice of Inspections; Post-Inspection activities is located on page 9, VII Documentation. No issues.

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

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections found this item is listed under Section V. Integrity Management Inspections will be performed at least every five years using the Federal form. Items pertaining to pre-inspection is located on page 10 under VIII Inspection Preparation & page 2, III Notice of Inspection; Inspection activities are addressed on page 2, III Notice of Inspections; Post-Inspection activities is located on page 9, VII Documentation. No issues.

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

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections found this item is listed under Section V. Operator Qualification Inspections will be performed at least every five years using the Federal form 14. Items pertaining to pre-inspection is located on page 10 under VIII Inspection Preparation & page 2, III Notice of Inspection; Inspection activities are addressed on page 2, III Notice of Inspections; Post-Inspection activities is located on page 9, VII Documentation. No issues.

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

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections found this item is listed under Section V. Damage Prevention Inspections will be performed on a limited basis not to excess 5 years. Items pertaining to pre-inspection is located on page 10 under VIII Inspection Preparation & page 2, III Notice of Inspection; Inspection activities are addressed on page 2, III Notice of Inspections; Post-Inspection activities is located on page 9, VII Documentation. No issues.

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

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

New Hampshire PUC Guidelines for Pipeline Safety Inspections found this item is listed under Section V. On-Site Operator Inspections will be performed on a limited basis. No issues.

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

Evaluator Notes:

New Hampshire PUC Guidelines for Pipeline Safety Inspections found this item is listed under Section V. page 6, Construction Inspections will be performed on a limited basis using information contained in Federal forms 2 & 5. Items pertaining to pre-inspection is located on page 10 under VIII Inspection Preparation & page 2, III Notice of Inspection; Inspection activities are addressed on page 2, III Notice of Inspections; Post-Inspection activities is located on page 9, VII Documentation. No areas of concerns.

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

New Hampshire PUC Guidelines for Pipeline Safety Inspections found these items are listed under Section 6. Risk Based Inspection Process. Inspection Risk Criteria spreadsheet shows the following items. Item a, is located in Inspection Risk Criteria, number 2. Item b, is located in Inspection Risk Criteria, number 10 thru 14 Item c, is located in Inspection Risk Criteria, number 15 Item d, is located in Inspection Risk Criteria, number 1, 16, 18 Item e, is located in Inspection Risk Criteria, number 17 Item f, this is determined by Program Manager based on each operator. No areas of concerns were noted or found.

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

Evaluator Notes:

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

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):  
173.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
220 X 2.00 = 440.00

Ratio: A / B  
173.00 / 440.00 = 0.39

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

### Evaluator Notes:

A.Total Inspection Person Days (Attachment 2)= 173

B.Total Inspection Person Days Charged to the program(220\*Number of Inspection person years(Attachment 7)=440

Formula:- Ratio = A/B = 173/440 = 0.39

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

Thus Points = 5

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

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

### Evaluator Notes:

Yes, David Burnell and Randy Knepper & Joseph Vercellotti have completed OQ.

David, Randy & Joseph have completed the DIMP/Root Cause training before conducting inspections. Joseph is in the process of completing the other required courses for Integrity Management. Randy & David have completed all IMP training courses and are the lead inspectors.

- 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, Program Manager, Randy Knepper, has over ten years of experience in pipeline safety and has served as NAPSIR Chairman.

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

### Evaluator Notes:

No response was required. NA

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

### Evaluator Notes:

Yes, NH PUC in conjunction with the New England Pipeline Safety Representatives hosted the TQ seminar on October 21-22, 2014 in Portsmouth, NH. The number of attendees were approximately two hundred.

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

Evaluator Notes:

Yes, a review of files and NH PUC written procedures confirm all inspections were scheduled in accordance to the established time intervals listed under "Intervals of Inspections" described in Section 4.

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

Evaluator Notes:

Yes, they use the federal forms or a version of the inspection forms to perform their inspections. A random review of inspection reports found all answers were completed with S, U, NA & NC in the appropriate block along with comments in the inspector remarks section.

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

Evaluator Notes:

Yes, this item is reviewed and checked on NH PUC Form #4 Comprehensive Corrosion and PHMSA Form 2. No issues.

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

Evaluator Notes:

Yes, NH PUC rule, "Admin Rule 508.04 (d)", requires all operators to submit information on cast iron pipeline pertaining to leakage, breaks and condition of pipe. Additionally, the rule requires leakage surveys be performed during winter months to monitor case iron pipelines.

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

Evaluator Notes:

Yes, this is checked during the standard inspection of the operator using the Federal Form 2.

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

Evaluator Notes:

Yes, this is addressed in NH PUC Rule number 504.06 and order number 25370. Operators are required to report all third party damages to PUC per NH PUC Rule 804.06 (a). Contractors are required to report all third party damages to PUC per Rule 805.05 (a).

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- |           |  |   |   |
|-----------|--|---|---|
| <b>12</b> | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues? | 2 | 2 |
|-----------|--|---|---|



Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, NH PUC staff monitor Operator Annual Reports by performing a review of each document when the operator files the report. This information is recorded into the Leak Data Summary spreadsheet for each operator. Additionally a review is performed checking results of leaks, cast iron & other items.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>13</b> | Did state input all applicable OQ, IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1 | 2 | 2 |
|-----------|---|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

A review of PHMSA Operator Qualification data base found three inspection reports for calendar year 2014 that was entered by David Burnell. This information matched the number reflected in attachment 2 of NH PUC 2014 Progress Report.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>14</b> | Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission? | 1 | 1 |
|-----------|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes. Staff members check the submission and updates by operators into the NPMS data base prior to performing inspections. Emails from operators about their updates are sent to the NH PUC office. A review of an email to Randy Knepper from Liberty Utilities on 6/25/2014 confirm this type of information is being provided.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>15</b> | Is the state verifying operators are conducting drug and alcohol tests as required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199 | 2 | 2 |
|-----------|---|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, this was verified by reviewing the inspection performed on Liberty Gas dated 11/20/2014. No issues.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>16</b> | Is state verifying operators OQ programs are up to date? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals determined in the operators plan. 49 CFR 192 Part N | 2 | 2 |
|-----------|---|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. NH PUC Rule 506.2(t) requires all operators to file their OQ programs with their agency. Anytime a change is made in the OQ program by the operator, they are required to file an updated copy of the program.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>17</b> | Is state verifying operator's gas transmission integrity management programs (IMP) are up to date? This should include a previous review of IMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart 0 | 2 | 2 |
|-----------|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. NH PUC Rule 506.2(t) requires all operators to file their IMP program with their organization. Anytime a change is made in the IMP program by the operator, they are required to file an updated copy.

- 
- |           |  |   |   |
|-----------|--|---|---|
| <b>18</b> | Is state verifying operator's gas distribution integrity management Programs (DIMP)? This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart P DIMP ? First round of program inspections should be complete by December 2014 | 2 | 2 |
|-----------|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. All operators have had a DIMP inspection and each plan reviewed is currently being monitored.

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

Evaluator Notes:

Yes, PAPEI inspections were performed on the private natural gas distribution systems before December 31, 2013.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>20</b> | Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public).<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

Yes, NH PUC Website address this item. No concerns.

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

Evaluator Notes:

NA. No safety related condition reports in CY2014.

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

Evaluator Notes:

Yes, NH operators are required to identify any plastic pipe and components that show a record of defects and file the information with NH PUC. This is a requirement listed in NH PUC order 25370 which became effective May 30, 2012.

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

Evaluator Notes:

Yes, NAPSRS survey request have been completed and submitted in a timely manner.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>24</b> | If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate.(New Question for CY2013, no points until CY2015 evaluation conducted in CY2016)<br>Info Only = No Points | 0 | 0 |
|-----------|--|---|---|

Evaluator Notes:

NH PUC requested the removal of the LNG waiver granted on February 11, 1993 be removed from PHMSA website. This request was submitted by Randy Knepper on November 7, 2014 and the waiver has been removed from PHMSA website.

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

Evaluator Notes:

Yes, Randy Knepper attended the 2014 NAPSRS National Meeting in Springfield, IL held Sept 15-Sept 19, 2014.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>26</b> | Discussion on State Program Performance Metrics found on Stakeholder Communication site. (question will be rolled up and included as part of Question C12 on future evaluations) <a href="http://primis.phmsa.dot.gov/comm/states.htm">http://primis.phmsa.dot.gov/comm/states.htm</a> | 0 | 0 |
|-----------|--|---|---|

Info Only = No Points

Evaluator Notes:

A discussion with Randy Knepper about NH PUC performance metric on PHMSA website was reviewed. Mr. Knepper is considering developing a performance metric on NH PUC website with more in-depth data.

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**27** General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

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

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



## PART D - Compliance Activities

Points(MAX) Score

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1<br>Yes = 4 No = 0 Needs Improvement = 1-3 | 4   | 4                                       |
| a.       | Procedures to notify an operator (company officer) when a noncompliance is identified  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b.       | Procedures to routinely review progress of compliance actions to prevent delays or breakdowns  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

- a. Yes, this item is located in Section IX Enforcement Procedures. All notifications are being sent to the company officer.
- b. Yes, this is addressed in NH PUC rule numbers 511.01-511.10 & listed in written procedures Section IX.

- |          |  |   |  |
|----------|--|---|--|
| <b>2</b> | Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1<br>Yes = 4 No = 0 Needs Improvement = 1-3 | 4   | 4  |
| a.       | Were compliance actions sent to company officer or manager/board member if municipal/government system?  | Yes <input type="radio"/> No <input type="radio"/>            | Needs Improvement <input checked="" type="radio"/> |
| b.       | Were probable violations documented?   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/>            |
| c.       | Were probable violations resolved?   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/>            |
| d.       | Was the progress of probable violations routinely reviewed?  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/>            |

Evaluator Notes:

- a. A review of NH PUC compliance file found two of the six LOC (Letter of Concerns) were not sent to the company officers in CY2014. Improvement is needed to insure propane company officers are notified of compliance action.
- b. Yes, this was checked in the compliance file and confirm probable violations were documented correctly.
- c. Yes, violations were resolved by consent agreements.
- d. Yes, Program Manager monitors the violations on a routine schedule.

- |          |  |   |   |
|----------|--|---|---|
| <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, a review of compliance file found six compliance actions: Irving, Suburban, AmeriGas, Liberty, Liberty & Unitil gas companies.

- |          |   |   |   |
|----------|---|---|---|
| <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, this is addressed in NH PUC Rule 511.09 and described in NH PUC written procedures manual Section IX, Enforcement 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, Randy Knepper has imposed civil penalties in the amount of \$51, 500 and collected an amount of \$114,250 in CY2014. The penalty amounts reported above do not include damage prevention violations or penalty amounts under state rules and regulations.

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

Evaluator Notes:

Yes, this is demonstrated by the civil penalty collected in CY2014 in the amount of \$114,250.

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

Evaluator Notes:

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

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



## PART E - Incident Investigations

Points(MAX) Score

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

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, NH PUC Guidelines for Pipeline Safety Inspections, Section V, Types of Inspection, "Failure Investigation Inspections", describes the receiving and responding to operator reports of accidents. This section reference Appendix E located in the Guidelines for States Participating in the Pipeline Safety Program regarding the MOU and Federal/State Cooperation Agreements. No issues of concern.

- 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, a & b are located in NH PUC Guidelines for Pipeline Safety Inspections, Section V, Types of Inspection, "Failure Investigation Inspections", describes the receiving and responding to operator reports of accidents. This section reference the Appendixes for the MOU and Federal/State Cooperation Agreements. NH PUC has a roster list of individuals on call and there names are mentioned on the emergency call in telephone number. No areas of concern.

- 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:

NA No incidents occurred in CY2014.

- 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:

NA No incidents occurred in CY2014.

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

Yes = 1 No = 0

Evaluator Notes:

NA No incidents occurred in CY2014.

- 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:

NA No incidents occurred in CY2014.

- 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:

NA No incidents occurred in CY2014.

---

- 8 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

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

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Total points scored for this section: 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, NH PUC Rule 805.02(e) covers trenchless technology and Rule 806.01, 806.02, 806.03, 806.04, 806.05 identify marking zone tolerance, markers, identification, emergency and marking certain newly installed underground facilities. Additionally, NH PUC form Damage Prevention Module includes this item in section 192.614 (5 & 5a). A review of one operator, Liberty Utilities Procedure Damage Prevention Section 11.C 6.6.7 was reviewed and found correct. No issues with this item.

- |   |   |   |   |
|---|---|---|---|
| 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, NH PUC requires operators to report marking of underground facilities and any mismatch or failed to mark. In addition to the federal inspection form, NH PUC inspectors use the damage prevention module E-26 to review notification, marking, positive response and the use of the one call system. The reporting requirement is reviewed by their Damage Prevention Staff member, Bill Ruoff, routinely. No issues.

- |   |  |   |   |
|---|--|---|---|
| 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, this is accomplished by the local distribution companies being a member of the Hampshire Management Underground Safety Training (MUST) organization. NH PUC has several best practices in locating underground facilities pertaining to using only company personnel in locating their gas lines and NH PUC rule 804.03 Training of Locators. This best practice was implemented thru individual NH PUC Order to each company operator. Additionally, training of December 11, 2014.

- |   |  |   |   |
|---|--|---|---|
| 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, NH PUC collects data on pipeline damages per 1,000 locate request. Operators and excavators are required to submit monthly causes of excavation damage and final determinations are made after due process in accordance with NH PUC Rule 804.01 (a-e) (E-26). Trends are plotted and reviewed by staff. A review of data found the number of damages per 1,000 . In CY2013 it was 1.10 and CY2014 it was 1.26.

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

Evaluator Notes:

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

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



## PART G - Field Inspections

Points(MAX) Score

- |          |   |                    |
|----------|---|--------------------|
| <b>1</b> | Operator, Inspector, Location, Date and PHMSA Representative<br>Info Only = No Points | Info OnlyInfo Only |
|----------|---|--------------------|

Name of Operator Inspected:

Liberty Utilities-Concord & Manchest, NH; Dead River Propane Company-Bristol, NH

Name of State Inspector(s) Observed:

Joe Vercellotti, Safety Engineer; David Burnell, Safety Engineer

Location of Inspection:

Concord, Manchester & Bristol, NH

Date of Inspection:

June 24-25, 2015

Name of PHMSA Representative:

Glynn Blanton, PHMSA State Programs

### Evaluator Notes:

This was a two day field inspection observation of two inspectors on two different days. The first day, June 24th, was a construction inspection of a new 6-inch steel main for a new CNG facility. The inspector checked the pipeline for date of manufactured, type material, and welding procedures being used to joint the sections of pipe. Welder qualifications and X-rays of joints of pipe were reviewed. The next field inspection was performed on Liberty Utilities at 312 Pearl Street in Manchester. Liberty completed a Grade 2 leak on a 6-inch cast iron bell joint by injecting an anaerobic sealant which was consistent with the operator's procedures. The last inspection was at 466 Weston Road. Liberty raised a valve box and found a leak on a 3/8-inch copper service line. The copper service line was replaced with a 3/4-inch Driscopex DR 11 PE 2406 plastic service pipe.

The second day, June 25th, was a office/field inspection of Dead River Propane Company in Bristol. The review of the operator's O&M Plan and maintenance records were observed. Regulator inspections were reviewed and initially the records indicated the set pressure testing on the system was not performed. A follow-up e-mail on Friday, June 26th confirm the system had been tested. A field review of the tanks located at the Old Province Commons Rte 104, Meredith shopping center was conducted. Observed tanks being cathodically protected and individual meter sets correctly located on the backside of the shopping mall.

- |          |  |    |
|----------|--|----|
| <b>2</b> | Was the operator or operator's representative notified and/or given the opportunity to be present during inspection?<br>Yes = 1 No = 0 | 11 |
|----------|--|----|

### Evaluator Notes:

Yes the operators were notified and had the opportunity to be present during the field inspections.

- |          |   |    |
|----------|---|----|
| <b>3</b> | 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)<br>Yes = 2 No = 0 Needs Improvement = 1 | 22 |
|----------|---|----|

### Evaluator Notes:

Yes, both inspectors used the federal/state forms to check the operator for compliance.

- |          |  |    |
|----------|--|----|
| <b>4</b> | Did the inspector thoroughly document results of the inspection?<br>Yes = 2 No = 0 Needs Improvement = 1 | 22 |
|----------|--|----|

### Evaluator Notes:

Yes, both inspectors thoroughly documented the results of their inspections immediately after returning to the office. Field notes were observed being taken during each inspection.

- |          |  |    |
|----------|--|----|
| <b>5</b> | Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps,pyrometer,soap spray,CGI,etc.)<br>Yes = 1 No = 0 | 11 |
|----------|--|----|

### Evaluator Notes:

Yes, each inspector checked the operator's equipment during the field inspection review.

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

Evaluator Notes:

Yes, both inspectors were very thorough in their review of the operator's written procedures, records and construction activities.

<b>7</b>	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, both inspectors have several years of experience and have completed all required TQ courses.

<b>8</b>	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, both inspectors reviewed their findings with the operator representative before leaving their office or field locations.

<b>9</b>	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:

No probable violations were found during the inspections performed by each inspector.

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

a.	Abandonment	<input type="checkbox"/>
b.	Abnormal Operations	<input type="checkbox"/>
c.	Break-Out Tanks	<input type="checkbox"/>
d.	Compressor or Pump Stations	<input type="checkbox"/>
e.	Change in Class Location	<input type="checkbox"/>
f.	Casings	<input type="checkbox"/>
g.	Cathodic Protection	<input checked="" type="checkbox"/>
h.	Cast-iron Replacement	<input checked="" type="checkbox"/>
i.	Damage Prevention	<input 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 checked="" type="checkbox"/>
p.	MOP	<input type="checkbox"/>
q.	MAOP	<input 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 checked="" type="checkbox"/> |
| v. | Overpressure Safety Devices       | <input checked="" type="checkbox"/> |
| w. | Plastic Pipe Installation         | <input type="checkbox"/>            |
| x. | Public Education                  | <input type="checkbox"/>            |
| y. | Purging                           | <input type="checkbox"/>            |
| z. | Prevention of Accidental Ignition | <input type="checkbox"/>            |
| A. | Repairs                           | <input type="checkbox"/>            |
| B. | Signs                             | <input type="checkbox"/>            |
| C. | Tapping                           | <input type="checkbox"/>            |
| D. | Valve Maintenance                 | <input checked="" type="checkbox"/> |
| E. | Vault Maintenance                 | <input type="checkbox"/>            |
| F. | Welding                           | <input checked="" type="checkbox"/> |
| G. | OQ - Operator Qualification       | <input type="checkbox"/>            |
| H. | Compliance Follow-up              | <input type="checkbox"/>            |
| I. | Atmospheric Corrosion             | <input type="checkbox"/>            |
| J. | Other                             | <input type="checkbox"/>            |

Evaluator Notes:

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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:

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

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

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

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

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

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

- |          |  |           |           |
|----------|--|-----------|-----------|
| <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