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

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)

# 2015 Gas State Program Evaluation -- CY 2015
Gas

**State Agency:** New Hampshire
**Agency Status:**
**Rating:**
**60105(a):** Yes **60106(a):** No **Interstate Agent:** No
**Date of Visit:** 09/20/2016 - 09/22/2016
**Agency Representative:** Randy Knepper
**PHMSA Representative:** Jim Anderson
**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 S. Fruit Street
**City/State/Zip:** Concord, New Hampshire 03301-2429

## 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 then the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual progress report attachments provide the basis for determining the state's pipeline safety grant allocation.

## Field Inspection (PART G):

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

## Scoring Summary

| PARTS | | Possible Points | Points Scored |
|---|---|---|---|
| A | Progress Report and Program Documentation Review | 10 | 10 |
| B | Program Inspection Procedures | 13 | 13 |
| C | Program Performance | 47 | 41 |
| D | Compliance Activities | 15 | 15 |
| E | Incident Investigations | 11 | 11 |
| F | Damage Prevention | 8 | 8 |
| G | Field Inspections | 11 | 11 |
| H | Interstate Agent State (If Applicable) | 0 | 0 |
| I | 60106 Agreement State (If Applicable) | 0 | 0 |
| **TOTALS** | | **115** | **109** |
| **State Rating** | | | **94.8** |

## 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:
Checked and accurate.

Notes were provided for support of inspection unit breakdown.

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

Evaluator Notes:
Checked and accurate.

Notes were provided on operator inspection days.

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

Evaluator Notes:
Checked and accurate.

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

Evaluator Notes:
There were 2 federally reportable incidents. OP IDs NRC IDs Property Damages listed. Summary Reports provided and State Causes supplied.
2 incidents listed on Progress Report and 2 incidents listed in Pipeline Data Mart.
Consistent with NH incident Data on State Website. Noted that State Cause Code was not identical for Operator Cause Code for Feb 2015 incident.
Consistent with information provided to Eastern Region Director.
Notes are provided to support further breakdown and methodology for evaluation.

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

Evaluator Notes:
Incorrect information was given on how to count Probable Violations and Compliance Actions. Correct information was provided during the evaluation.

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

Evaluator Notes:
One central office in which inspectors and program personnel report daily. Files are in both paper and electronic format and kept updated. Inspection Database, Compliance Database and Underground Damage Prevention Database are maintained and accessible for all program personnel. Compliance Database edits are allowed by a single program assistant. 30 types of records are tracked and maintained. 22 additional reports are required of operators that are tracked and maintained.

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| | | | |
|---|---|---|---|
| **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:
Checked and accurate.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
NH PUC has automatic adoption of CFR Parts 191, 192, 193, 198 & 199 in Administrative Rule Puc 506.01 (a) for utilities and CFR Parts 191, 192 for non-utilities in Administrative Rule Puc 512.01 (a). Civil Penalty amounts are listed in RSA 374:7-a Violation and adopt maximums as reference in 49 U.S.C. section 60122(a). Currently $200,000 and $2,000,000. Underground Damage Prevention Civil Maximum Penalties are $5,000 per violation although a single damage can result in multiple violations. These are determined by RSA 374:55 (VIII) and Administrative Rule Puc 807.07 (a).

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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:
No issues.

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**10** General Comments: — Info Only — Info 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 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.<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |

Evaluator Notes:

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections last revised in Dec 2015 found this item is listed located on page 6, under Routine Inspections within Section V. Types of Inspections. All inspections will be performed at least every five years using Federal Form 2. These are supplemented with NH inspection modules covering specific areas and further supplemented by Specific Activity Items Inspections. Collectively these will comprise and cover the components of Standard Inspections.
Instructions pertaining to pre-inspection are located on page 11 under Section VIII Inspection Preparation, page 2, Section III Notice of Inspection; and page 13 under Section IX Miscellaneous/General.

Inspection activities instructions are addressed on page 2, Section III Notice of Inspections; page 11 under Section VII. Documentation; and page 13 under Section IX Miscellaneous/General

Post-Inspection activities is located on page 11, Section VII Documentation and page 13 under Section IX Miscellaneous/ General.

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| | | Points(MAX) | Score |
|---|---|---|---|
| **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.<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |

Evaluator Notes:

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections last revised in Dec 2015 found this item is listed located on page 8, under Integrity Management Inspections within Section V. Types of Inspections. All inspections will be performed at least every five years using Federal Form PHMSA GT IA form for the former Protocols A-N. Form 16 can be used for subsequent assessments in the field (typically ILI). This Integrity Management Inspections is comprised of Distribution IMP and Transmission IMP. Federal Database updates are required.
Instructions pertaining to pre-inspection is located on page 11 under Section VIII Inspection Preparation, page 2, Section III Notice of Inspection; and page 13 under Section IX Miscellaneous/General.
Inspection activities instructions are addressed on page 2, Section III Notice of Inspections; page 11 under Section VII. Documentation; and page 13under Section IX Miscellaneous/General.
Post-Inspection activities is located on page 11, Section VII Documentation and page 13under Section IX Miscellaneous/ General.

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| | | Points(MAX) | Score |
|---|---|---|---|
| **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.<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |

Evaluator Notes:

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections dated Dec 2015 found this item is listed on page 9 under Section V. Operator Qualification Inspections will be performed at least every five years using the Federal Form 14 for Protocols 1-8. Uploading results to the federal database (when possible) is a requirement.

Items pertaining to pre-inspection is located on page 11 under Section VIII Inspection Preparation and page 2, Section III Notice of Inspection.
Inspection activities instructions are addressed on page 2, Section III Notice of Inspections; page 11 under Section VII. Documentation; and page 13 under Section IX Miscellaneous/General.
Post-Inspection activities is located on page 11, under Section VII Documentation and page 13 under Section IX

Miscellaneous/General.

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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:

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections last revised Dec 2015 found this item is listed on page 9 under Section V Damage Prevention Inspections will be performed on a limited basis not to exceed 5 years. Note The Safety Division rarely performs Damage Prevention Inspections except to review the Operator's O&M and OQ plans that pertain to Damage Prevention. Most field inspections are referred to the Underground Damage Prevention Specialist to investigate and enforce. The Safety Division Underground Damage Prevention Guidelines were recently established that discusses the enforcement procedures.

Instructions pertaining to pre-inspection is located on page 11 under Section VIII Inspection Preparation , page 2, Section III Notice of Inspection; and page 13 under Section IX Miscellaneous/General
Inspection activities instructions are addressed on page 2, Section III Notice of Inspections; page 11 under Section VII. Documentation; and page 13 under Section IX Miscellaneous/General
Post-Inspection activities is located on page 11, Section VII Documentation and page 13under Section IX Miscellaneous/ General.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

New Hampshire PUC Guidelines for Pipeline Safety Inspections last revised in Dec 2015 found this item is listed On-Site Operator Inspections under Section V. Types of Inspections will be performed on a limited basis with no associated inspection interval. These are rarely performed and classified as such. New Hampshire restricts the use of On Site Operator Training given by inspectors as an Inspection Type and is listed on page 8.

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**6** Construction Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections last revised in Dec 2015 found this item is listed located on page 6, under Routine Inspections within Section V Types of Inspections. All inspections will be performed on a limited basis with no specific associated inspection cycle and make up the applicable OPS Forms 2 and 5. These are supplemented with NH inspection modules covering specific areas and further supplemented by Specific Activity Items Inspections. Collectively these will comprise and cover the components of Design Testing and Construction. Typically these inspections are reserved for material selections for new systems, valve spacing design criteria (state) and bridge crossings. Most everyday construction activities fall under Standard Inspections since they are connected to existing systems and incorporate written procedures into the O&M manual.
Instructions pertaining to pre-inspection is located on page 11 under Section VIII Inspection Preparation, page 2, Section III Notice of Inspection; and page 13 under Section IX Miscellaneous/General

Inspection activities instructions are addressed on page 2, Section III Notice of Inspections; page 11 under Section VII. Documentation; and page 13 under Section IX Miscellaneous/General

Post-Inspection activities are located on page 11, Section VII Documentation and page 13 under Section IX Miscellaneous/ General.

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

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

| | | | |
|---|---|---|---|
| a. Length of time since last inspection (Within five year interval) | Yes ◉ | No ○ | Needs Improvement ○ |
| b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) | Yes ◉ | No ○ | Needs Improvement ○ |
| c. Type of activity being undertaken by operators (i.e. construction) | Yes ◉ | No ○ | Needs Improvement ○ |
| d. Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc) | Yes ◉ | No ○ | Needs Improvement ○ |
| 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 ◉ | No ○ | Needs Improvement ○ |
| f. Are inspection units broken down appropriately? | Yes ◉ | No ○ | Needs Improvement ○ |

Evaluator Notes:

New Hampshire PUC Guidelines for Pipeline Safety Inspections last revised found these items are listed under Section VI. 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 and is specific to each type of operator.

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**8** General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

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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<br>Yes = 5 No = 0<br>A. Total Inspection Person Days (Attachment 2):<br>181.00<br>B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):<br>220 X 2.00 = 440.00<br>Ratio: A / B<br>181.00 / 440.00 = 0.41<br>If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0<br>Points = 5 | 5 | 5 |

Evaluator Notes:
No issues. Ratioo .41 is greater than the needed ratio of .38.

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

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

Evaluator Notes:
D Burnell completed an IMP inspection without completing all IMP training courses.

D Burnell, J Vercellotti, and R Knepper have completed OQ Training.
J Vercellotti, has completed DIMP and IMP Training.
D Burnell, J Vercellotti, and R Knepper have completed Root Cause Training.
All three have obtained minimum qualifications to lead Standard Inspection as Lead Inspector.

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| | | Points(MAX) | Score |
|---|---|---|---|
| **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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |

Evaluator Notes:
Randy Knepper has nearly 12 years experience as Program Manager and has been past NAPSR Chair and Chairs the NARUC Pipeline Staff Subcommittee as well as participates on various NAPSR Subcommittees.

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| | | Points(MAX) | Score |
|---|---|---|---|
| **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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | NA |

Evaluator Notes:
No noted deficiencies in the July 23, 2015 Chairman's Letter.

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| | | Points(MAX) | Score |
|---|---|---|---|
| **5** | Did State hold PHMSA TQ Seminar in Past 3 Years? Chapter 8.5<br>Yes = 2 No = 0 | 2 | 2 |

Evaluator Notes:
Yes, NH PUC in conjunction with the New England Pipeline Safety Representatives (NEPSR) held the TQ seminar on

October 20-21, 2015 in West Dover, VT. The number of attendees were approximately two hundred. NEPSR holds a TQ Seminar each year in October on a rotating basis for States Hosting (6 states).

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**6** Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1 — 5 — 0

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

Evaluator Notes:

NO, a review of inspection reports and NH PUC written procedures confirmed not all inspections were conducted in accordance to the established time intervals listed under Section IV Intervals of Inspections described on pages 2-5.

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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 — 2 — 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, New Hampshire uses the federal forms or a version of the inspection forms to perform their inspections. Inspection reports found all answers were completed with S, U, NA & NC in the appropriate block along with comments in the inspector remarks section. New Hampshire does not use S+ or Concern on their inspection reports. NH also requires inspectors to fill out comments so that rationale for the inspection result is evident.

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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 — 1 — 1

Yes = 1 No = 0

Evaluator Notes:

This is shown on PHMSA Form 2 and NH PUC inspection Form 4 Comprehensive Corrosion (reviewed Form 4 for verification).

Unitil (Northern Utilities) lists in Section 6.3.3 of their O&M this requirement. Each segment requires replacement or repair.

Liberty lists in Section 8B Examination of a Buried Pipe When Exposed in subsection 6.2 Inspection for Graphitization describes inspection and requires replacement or repair.

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

Yes = 1 No = 0

Evaluator Notes:

Liberty is required to file all leaks, all Cast Iron breaks on a monthly basis to the Safety Division per Puc 508.05 (d) and 509.15. In addition Puc rule 508.04 (d) requires continuous monitoring during the winter months of any system containing cast iron. Lastly Liberty partakes in a Cast Iron Bare Steel accelerated replacement program where all replacements are ranked for priority of replacement. This program is annually docketed and reviewed formally with the Commission.

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

Yes = 1 No = 0

Evaluator Notes:

Federal Form 2 is used by NH to accomplish this.

Liberty contains this in Section 12 C Leakage Surveys subsection 6.7 Leakage Investigation for Leakage Surveys Liberty's Emergency Response plans has numerous references to Leak Investigation (section B, F, H, and Appendices)

Unitil's O&M lists this in Section 2 N Leak Management subsections 1.0 General and 3.2 Sub-Surface Gas Detection Survey (including barhole surveys). Unitil's Emergency Response Plan section IV. EMERGENCY RESPONSE PROCESSES references in subsection C Initial Response & Reporting states "If the emergency involved an indication of a gas leak it shall be graded and investigated in accordance with Unitil's O&M Manual (Section 2-N Leak Management)".

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

Yes = 1 No = 0

Evaluator Notes:

Leak Response is reported monthly by Liberty and Unitil per Commission Orders. Monthly records are tracked and graphed by the Safety Division. Third Party Damages are required to be reported monthly and these are tracked by the Underground Damage Prevention Specialist. Each damage is reviewed to ensure appropriate operator response. Previous Accidents, while few, are also required to be reviewed for Emergency Response Times. Times are specified to be 30 minutes, 45 minutes or 60 minutes depending upon the time of discovery. For small operators it is limited to 30 minutes.

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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? — 2 — 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Operator Annual Reports are reviewed, data analyzed and trending performed for Liberty and Unitil and formerly NH Gas. Historical Tracking is achieved and results posted on Safety Division Websites. Accuracy of data reflects the data integrity issues each company has. EFVs were reviewed in 2014 and Operator contacted to correct problem. NOPV's have been issued for failing to report Mechanical Fittings.

Progress Report reflects the review of Incidents for 2015 that reflects State has determined different causes reported. Reviewed PLS website for varification.

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**13** Did state input all applicable OQ, DIMP/IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1 — 2 — 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

OQ and IMP inspections are updated into federal database or use IA forms. Timeliness is based on PHMSA's changing of security issues, accessibility to the databases, types of forms that can be uploaded. Most of these require multiple phone calls and attempts to upload.

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**14** 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:

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 3/15/2015 confirm this type of information is being provided. There were no changes. NH webpage has map of pipelines on it.

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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 — 2 — 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

NH completes this as part of LNG review each year. Also D&A test was ordered in 2016 not (2015) when an overpressurization occurred during a service tie in from Low Pressure to High Pressure.

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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 — 2 — 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

OQ plans are required to be submitted annually per Puc 506.02 (t) including notifications of changes. Field verification is performed often during field inspections.

**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 — 2 — 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

IMP plans are required to be submitted annually per Puc 506.02 (t) including notifications of changes. The Safety Division just switched from an 84 month review to a 60 month review. The transmission lines are piggable or made of plastic so the IMP inspections are not complex for the 19 miles of transmission pipeline. Latest pipeline run was in Nov 2015 with anomaly dig in 2016.

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

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

The Safety Division staggers them. The plans are required to be submitted annually by Puc 506.02(t). Liberty was a comprehensive review and completed in 2014. Unitil will be reviewed in 2016 again. Operators use ITS's, a New England Consordium, plan.

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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 — 2 — 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

PAPEI Inspections were completed for Liberty and Unitil by December 2013. Smaller LPGs have a simplified verification process.

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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). — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The Safety Division website has information including enforcement for damage prevention activities and pipeline safety violations. The Safety Division is looking to enhance this in 2016 to include all enforcement actions.

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**21** Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 — 1 — NA

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

None were reported in 2015.

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**22** Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns? — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

New Hampshire PUC Order 2570 in 2012 makes this an annual requirement . All Adyl A failures are reported to PPDC and the PUC.

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**23** Did the state participate in/respond to surveys or information requests from NAPSR or PHMSA? — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
New Hampshire responds to surveys from NAPSR or PHMSA.

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

Evaluator Notes:
There has only been one waiver ever by the NHPUC and it was outdated. 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 wavier has been removed from PHMSA website in 2015.

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

Evaluator Notes:
Randy Knepper attended the National Meeting in Tempe, AZ the entire week of August 30 through September 4, 2015. He conducted a Legislative Subcommittee Meeting during the event at the Board Meeting.

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**26** Discussion on State Program Performance Metrics found on Stakeholder Communication site - http://primis.phmsa.dot.gov/comm/states.htm 2 2
No = 0 Needs Improvement = 1 Yes = 2

a. Discussion of Potential Accelerated Actions (AA's) based on any negative trends Yes ◉ No ○ Needs Improvement ○

b. NTSB P-11-20 Meaningful Metrics Yes ◉ No ○ Needs Improvement ○

Evaluator Notes:
Discussion was held and metric website was reviewed during the evaluation.

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

Evaluator Notes:

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Total points scored for this section: 41
Total possible points for this section: 47

## PART D - Compliance Activities

| | | Points(MAX) | Score |
|---|---|---|---|
| **1** | Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1<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 ○ No ◉ Needs Improvement ○

b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns — Yes ○ No ◉ Needs Improvement ○

Evaluator Notes:

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections last revised in Dec 2015 found this item is listed located on pages 14-16, under within Section X. Types of Inspections.
Puc Rules 511.01 through 511.10 requires response with time frames noted for NOPVs and NOVs.

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| | | | |
|---|---|---|---|
| **2** | Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1<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 ◉ No ○ Needs Improvement ○

b. Document probable violations — Yes ◉ No ○ Needs Improvement ○

c. Resolve probable violations — Yes ◉ No ○ Needs Improvement ○

d. Routinely review progress of probable violations — Yes ◉ No ○ Needs Improvement ○

e. Were applicable civil penalties outlined in correspondence with operator(s) — Yes ◉ No ○ Needs Improvement ○

Evaluator Notes:

Compliance actions were sent to Company Officers. For LPG operators, a spreadsheet is kept of names of officers after contact is made in the beginning of year.
All NOPV/NOVs are documented. A separate folder is kept for each one.
NOPV if conditions are issued are followed up and tracked in a database for pipeline safety violations.

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

Evaluator Notes:

Yes, all compliance actions are issued after review of violations is performed by the entire Inspection Staff.

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| | | | |
|---|---|---|---|
| **4** | 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:

Due process is built into the Puc 511.09 rule and can be appealed or adjudicated to the Commission.

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| | | | |
|---|---|---|---|
| **5** | Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |

Evaluator Notes:

Randy Knepper has imposed civil penalties in the amount of $61, 500 and collected an amount of $31,500 in CY2015. The remaining $30,000 has been collected in 2016 after adjudication was completed. The penalty amounts reported above do not include damage prevention violations or penalty amounts under state rules and regulations those total $18,000 and $12,000 of equivalent training for cases involving gas pipelines.

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

Evaluator Notes:

Issued $61,500 in fines in 2015.

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

Evaluator Notes:

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

Evaluator Notes:
NH PUC Guidelines for Pipeline Safety Inspections, Section V,page 5, Types of Inspection, "Failure Investigation Inspections", describes the receiving and responding to operator reports of accidents.

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

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:
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.

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

Evaluator Notes:
In CY 2015 there were 2 incidents. Both incident investigations were responded to the same day as they occurred. Inspector and Program Manager responded to each.

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| | | | |
|---|---|---|---|
| **4** | Were all incidents investigated, thoroughly documented, and with conclusions and recommendations?<br>Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |

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:
Both incidents completed using the PHMSA OPS Form 11 and documented on the Progress Review.

---

| | | | |
|---|---|---|---|
| **5** | Did the state initiate compliance action for violations found during any incident/accident investigation?<br>Yes = 1 No = 0 | 1 | 1 |

Evaluator Notes:
The Safety Division issued $7,500 in violations for not meeting reporting deadlines for February 2015 incident. Part 191.9
The Safety Division is contemplating issuing violations for compliance actions for the Dec 2015 incident although none were contributing factors toward the incident.

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

Evaluator Notes:
Letter sent to Byron Coy from R Knepper December 14, 2015 regarding Locke Rd., Hampton, NH Incident.

**7** Does state share lessons learned from incidents/accidents? (sharing information, such as: at NAPSR Region meetings, state seminars, etc) 1 1

Yes = 1 No = 0

Evaluator Notes:

Lessons learned are shared at the NAPSR Eastern Region Meeting as was done in Portland ME presentation of 2015 by R Knepper. Incidents are posted on Safety Division website for the public. All reports are subject to NH Right to Know Law (similar to federal FOIA).

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**8** General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

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

## PART F - Damage Prevention

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

Evaluator Notes:

NH PUC Rule 805.02(e) covers trench less 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.
Unitil (Northern Utilities) states in section 2G of the O&M "Each natural gas utility shall maintain written procedures for protecting existing underground facilities during directional drilling and other trenchless technology installation techniques. These written procedures shall utilize the guidance material provided by the Gas Piping Technology Committee (GPTC) detailed in Guidance Material Appendix G-192-6, or other recognized industry standard. [ME Puc 420.3D] Refer to Appendix 2-G, GPTC Guide Material G-192-6."

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

NH PUC requires operators to report marking of underground facilities and any mismark 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 Specialist each month.
Positive Response is required by Puc rule PUC 804.02(e) and 806.02 (a)(2).

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

This is accomplished by the local distribution companies being a member of the Hampshire Management Underground Safety Training (MUST) organization which is a recognized regional CGA partner. 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. All nine elements have been adopted by the NHPUC as recognized by the 2014 PHMSA Characterization Tool Results.

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

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 CY2015 it was 1.32 and CY2014 it was 1.26. Past 5 years are found on the Safety Division Website under "Overall NH Damage Prevention Statistics"
Reviewed information on NH PUC website.

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| | | | |
|---|---|---|---|
| **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<br>Info Only = No Points<br>Name of Operator Inspected:<br>(1) Liberty Utilities (2) Unitil (3) Eastern Propane<br>Name of State Inspector(s) Observed:<br>(1) Joe Vercellotti (2) Joe Vercellotti (3) David Brunell<br>Location of Inspection:<br>(1) Keene, NH (2) Dover, NH (3) Loudon, NH<br>Date of Inspection:<br>(1) May 10, 2016 (2) May 11, 2016 (3) September 21, 2016<br>Name of PHMSA Representative:<br>Jim Anderson | Info Only | Info Only |

Evaluator Notes:

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

Evaluator Notes:
1 - yes, no issues
2 - yes, no issues
3 - yes, no issues

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

Evaluator Notes:
1 - yes, no issues
2 - yes, no issues
3 - yes, no issues

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

Evaluator Notes:
1 - yes, but needed more detail on verification on maintenance
2 - yes, no issues
3 - yes, no issues

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| | | | |
|---|---|---|---|
| **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.)<br>Yes = 1 No = 0 | 1 | 1 |

Evaluator Notes:
1 - NA
2 - yes, no issues
3 - yes, no issues

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| | | | |
|---|---|---|---|
| **6** | Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| | a. Procedures | ☒ | |
| | b. Records | ☒ | |
| | c. Field Activities | ☒ | |

d. Other (please comment) ☐

Evaluator Notes:
1 - yes, no issues
2 - yes, no issues
3 - yes, no issues

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

Evaluator Notes:
1 - yes, no issues
2 - yes, no issues
3 - yes, no issues

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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) 1 1
Yes = 1 No = 0

Evaluator Notes:
1 - yes, no issues
2 - yes, no issues
3 - yes, no issues

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

Evaluator Notes:
1 - none found
2 - none found
3 - none found

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

a. Abandonment ☐
b. Abnormal Operations ☐
c. Break-Out Tanks ☐
d. Compressor or Pump Stations ☐
e. Change in Class Location ☐
f. Casings ☐
g. Cathodic Protection ☐
h. Cast-iron Replacement ☐
i. Damage Prevention ☐
j. Deactivation ☐
k. Emergency Procedures ☐
l. Inspection of Right-of-Way ☐
m. Line Markers ☐
n. Liaison with Public Officials ☐
o. Leak Surveys ☐
p. MOP ☐
q. MAOP ☐
r. Moving Pipe ☐
s. New Construction ☒
t. Navigable Waterway Crossings ☐

| | | |
|---|---|---|
| u. | Odorization | ☐ |
| v. | Overpressure Safety Devices | ☐ |
| w. | Plastic Pipe Installation | ☒ |
| x. | Public Education | ☐ |
| y. | Purging | ☐ |
| z. | Prevention of Accidental Ignition | ☐ |
| A. | Repairs | ☐ |
| B. | Signs | ☐ |
| C. | Tapping | ☐ |
| D. | Valve Maintenance | ☐ |
| E. | Vault Maintenance | ☐ |
| F. | Welding | ☐ |
| G. | OQ - Operator Qualification | ☐ |
| H. | Compliance Follow-up | ☐ |
| I. | Atmospheric Corrosion | ☐ |
| J. | Other | ☐ |

Evaluator Notes:
(3) - O&M procedures

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

## PART H - Interstate Agent State (If Applicable)

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

Evaluator Notes:

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| | | | |
|---|---|---|---|
| **2** | 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:

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| | | | |
|---|---|---|---|
| **3** | 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:

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| | | | |
|---|---|---|---|
| **4** | Were probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |

Evaluator Notes:

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| | | | |
|---|---|---|---|
| **5** | 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:

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

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| | | | |
|---|---|---|---|
| **7** | 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:

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

Evaluator Notes:

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

## PART I - 60106 Agreement State (If Applicable)

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

Evaluator Notes:

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| | | | |
|---|---|---|---|
| **2** | 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:

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

Evaluator Notes:

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| | | | |
|---|---|---|---|
| **4** | 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:

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| | | | |
|---|---|---|---|
| **5** | 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:

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

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

Evaluator Notes:

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