



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

Tennessee Regulatory Authority

## 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:** Tennessee

**Agency Status:**

**Date of Visit:** 08/08/2016 - 08/12/2016

**Agency Representative:** Annette Ponds, Chief, Gas Pipeline Safety

Earl Taylor, Executive Director

James Travis Aslinger, Engineer

Pete Hut, Engineer

Tim Thompson, Engineer

Shinisha Freeman, Engineer

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

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

**Name/Title:** David F. Jones, Chairman

**Agency:** Tennessee Regulatory Authority

**Address:** 502 Deadrick Street, 4th Floor

**City/State/Zip:** Nashville, Tennessee 37243

**Rating:**

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

## INSTRUCTIONS:

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2015 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. A deficiency in any one part of a multiple part question should be scored as needs improvement. Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual progress report attachments provide the basis for determining the state's pipeline safety grant allocation.

## Field Inspection (PART G):

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

## Scoring Summary

### PARTS

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

### Possible Points Points Scored

10	8.5
13	13
49	49
15	15
11	11
8	8
10	10
0	0
0	0
<b>116</b>	<b>114.5</b>

### TOTALS

**State Rating** ..... **98.7**

## PART A - Progress Report and Program Documentation Review

Points(MAX) Score

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

Evaluator Notes:

A review of Attachment 1, State Jurisdiction found information was correct. Units inspected reflect all were visited in CY2015.

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

Evaluator Notes:

Reviewed Tennessee Regulatory Authority (TRA) spreadsheet to monitor the number of inspection days to Attachment 2 results. Information on spreadsheet and attachment were the same.

- |   |                                                                                                                                                    |   |   |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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 list of operators in attachment 3 and found information was correct.

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

Evaluator Notes:

Yes, three incidents that occurred in CY2015 were investigated by TRA inspectors and a report of their causes were listed.

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

Evaluator Notes:

Reviewed Attachment 5 and TRA spreadsheet. The number of carried over violations from CY2015 in the attachment was listed as 87. This number is different from previous year CY2014 Attachment 5, showing 118. This could be due to TRA reviewing all inspection reports and correcting the number. However, a second review of this information was conducted during the evaluation and it was found the number should be 96 and number found during the year should be 106 instead of 117. Improvement is needed in providing the correct numbers for carried over violations and violations found during the calendar year. Therefore, a loss of one point occurred. Attachment 5 will need to be corrected in FedSTAR to reflect the correct numbers by contacting Carrie Winslow, PHMSA State Programs.

- |   |                                                                                                                                   |   |   |
|---|-----------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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, information on reports, letters, forms and other pipeline safety records was accessible and well-organized.

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

Evaluator Notes:

A review of SABA transcripts confirm all employees listed and training dates were correctly entered. No areas of concern with training records. However, improvement is needed in listing the Program Manager under the Inspector category due to performing 20 pipeline safety inspection in CY2015.

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

Evaluator Notes:

No issues and information listed in Attachment 8 is correct.

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

Evaluator Notes:

A review of Attachment 10 confirm planned performance goals and accomplishments were completed.

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

Evaluator Notes:

A loss of points occurred in questions A.5 & A.7.

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Total points scored for this section: 8.5  
Total possible points for this section: 10



## PART B - Program Inspection Procedures

Points(MAX) Score

- |   |                                                                                                                                                                                                                                                                                    |   |   |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 1 | Standard Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 2 | 2 |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

A review of Tennessee Regulatory Authority (TRA), Gas Pipeline Safety Division Program Plan found this item listed on page 7, under "Comprehensive (Standard) Inspections". All inspections are performed at least once every five years using Federal Form 2. Items pertaining to pre-inspection and post-inspection activities are listed in Section B and C on page 4 under Conducting Inspections.

- |   |                                                                                                                                                                                                                                                                                        |   |   |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 2 | IMP and DIMP Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

A review of Tennessee Regulatory Authority (TRA), Gas Pipeline Safety Division Program Plan found this item listed on pages 10 & 11.

- |   |                                                                                                                                                                                                                                                                              |   |   |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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 TRA, Gas Pipeline Safety Division Program Plan found this item listed on page 9, under " Training & Operator Qualification Inspections". All inspections are performed at least once every five years.

- |   |                                                                                                                                                                                                                                                                                             |   |   |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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 TRA, Gas Pipeline Safety Division Program Plan found this item listed on page 10, under M, Damage Prevention Activities.

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

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

A review of TRA, Gas Pipeline Safety Division Program Plan found this item listed on page 9, under I, Training & Operator Qualification Inspections.

- |   |                                                                                                                                                                                                                                                                                        |   |   |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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 TRA, Gas Pipeline Safety Division Program Plan found this item listed on page 8, under H, Design, Testing and Construction Inspections.

- 7 Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? 6 6  
Yes = 6 No = 0 Needs Improvement = 1-5
- |                                                                                                                                                                                                              |                                      |                          |                                         |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|--------------------------|-----------------------------------------|
| a. Length of time since last inspection (Within five year interval)                                                                                                                                          | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)                                                                                                 | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. Type of activity being undertaken by operators (i.e. construction)                                                                                                                                        | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc)                                                                                              | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f. Are inspection units broken down appropriately?                                                                                                                                                           | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

A review of TRA, Gas Pipeline Safety Division Program Plan found these items listed on page 3, under B, Inspection Priorities under Inspection Planning. A review inspection units found them to be broken down correctly.

8 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

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

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):  
654.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
 $220 \times 5.42 = 1191.67$

Ratio: A / B  
 $654.00 / 1191.67 = 0.55$

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)= 654

B.Total Inspection Person Days Charged to the program( $220 \times$ Number of Inspection person years(Attachment 7)=1191.66652

Formula:- Ratio = A/B =  $654/1191.66652 = 0.55$

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:

Two inspectors have completed all basis gas courses and meet the gas inspector training requirements, Pete Hut & Shinisha Freeman. The remaining inspectors are scheduled to complete all training by end of year. Pete Hut & Shinisha Freeman have completed DIMP Inspector Training requirements. Pete Hunt, Shinisha Freeman, Phillip Hendricks & Annette Ponds have completed the root cause course. No outside training courses were completed in CY2015. All inspectors have completed the OQ training course and can be the lead inspector.

- 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 has a basic understanding of the requirements of the pipeline safety program but needs to refer and use the "Guidelines for States Participating in the Pipeline Safety Program" in answering questions about the program. With new inspectors joining the organization it will be a challenging for her and her staff in providing mentoring service. If assistance is needed, please contact PHMSA Southern Region State Liaison for help in mentoring new inspectors.

- 4 Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1 2 2  
Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

Yes, Chairman Herbert Hilliard's response letter to Zach Barrett was sent on July 30, 2015 and within the required 60 days time frame.

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

Yes = 2 No = 0

Evaluator Notes:

The last seminar held was November 18-20, 2014. TRA plans to hold a TQ Seminar in calendar year 2017.

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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 CY2015 inspection reports confirm all inspection units were visited and half of the operators had a standard inspection performed. The remaining half are scheduled to have a standard inspection performed in CY2016 and within the TRA written procedures, Section C, Time Intervals, 5 years.

- 
- |          |                                                                                                                                                                                                                            |   |   |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <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, TRA uses the Federal Inspection forms with additional information listed in the document that is relative to their rules and regulations.

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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 question is in the Federal inspection form used by the inspector. A review of inspection reports found this item was checked and reviewed with the operator. No areas of concern.

- 
- |          |                                                                                                                                                                                                                                                                                                                                        |   |   |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <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, this item is on the Federal inspection form used by the inspector. A review of inspection reports found this item checked and reviewed with the operator.

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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 and reviewed with the operator during a standard or other type of inspection.

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

Evaluator Notes:

Yes, this item is reviewed with the operator and discussed under 192.617 and in a review of the operator's annual report and damage prevention tickets.

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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, TRA reviews all operators annual reports as they are submitted and records the information into their Risk Management Model. The model is used to establish inspection priorities for the operators to be inspected. A review of the data and incident/accident reports are reviewed by each inspector prior to performing an inspection.

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

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, improvement was note during this evaluation. TRA has uploaded all OQ, DIMP/IMP inspection results into the federal database within a reasonable time. As the date of this review, TRA has uploaded 50 OQ inspection results into the data base for CY2016.

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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, this item is reviewed with the operator during the inspection and covered under the Federal inspection form.

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

No Drug and Alcohol inspections were performed in CY2015. However, the TRA reviews MIS forms for each operator during the annual inspection.

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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, four OQ inspections were performed in CY2015. A review of inspection reports confirm the operator's IMP was checked and found to be up to date.

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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:

TRA is using the Federal IA form to meet this requirement. Additionally, they are reviewed the operator's plans during the inspection visit.

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

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, inspectors are checking DIMP plans and monitoring progress of the operator in meeting this requirement during the inspection visits. TRA will start a review of this item again in CY2016.

- |    |                                                                                                                                                                                                                                                                                                                                                                 |   |   |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 19 | Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. 49 CFR 192.616 (I13-16) PAPEI Effectiveness Inspections should be conducted every four years per RP1162<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

Yes, TRA has completed PAPEI on all operators on or before September, 2014. PAPEI will be rescheduled in CY2018.

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

Evaluator Notes:

Yes, TRA has a website that provides information to the operators and general public about pipeline safety and damage prevention.

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

Evaluator Notes:

No safety related condition reports in CY2015.

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

Evaluator Notes:

Yes, this item is reviewed with the operator during the DIMP inspection and other meeting with the operator.

- |    |                                                                                                                                        |   |   |
|----|----------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 23 | 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, TRA has responded to NAPSRS surveys in a timely manner.

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

Evaluator Notes:

No state waivers/special permits have been issued and they are familiar with notifying PHMSA of these permits via email in the future.

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

Evaluator Notes:

Yes, Anita Ponds attended the NAPSRS National Meeting in Tempe, AZ on Sept 1-4, 2015.

- |    |                                                                                                                                                                                                                                         |   |   |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 26 | Discussion on State Program Performance Metrics found on Stakeholder Communication site - <a href="http://primis.phmsa.dot.gov/comm/states.htm">http://primis.phmsa.dot.gov/comm/states.htm</a><br>No = 0 Needs Improvement = 1 Yes = 2 | 2 | 2 |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

- |    |                                                                                 |                                      |                          |                                         |
|----|---------------------------------------------------------------------------------|--------------------------------------|--------------------------|-----------------------------------------|
| a. | Discussion of Potential Accelerated Actions (AA's) based on any negative trends | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | NTSB P-11-20 Meaningful Metrics                                                 | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

Provided Anita Ponds, program manager, a copy of Tennessee State Program Metrics documents and discussed each chart. In a review of charts, it was noted the number of excavation is in a downward trend. However, a review of other charts found a high number of leaks repaired per 1,000 miles of distribution system. It was suggested these trends be compare with the operator's annual report and discussed with the operator during a pipeline safety inspection.

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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: 49  
Total possible points for this section: 49



## PART D - Compliance Activities

Points(MAX) Score

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

### Evaluator Notes:

a. A review of Tennessee Regulatory Authority Gas Pipeline Safety Division, Section R, page 11, found written information on notification to the company officer when a non-compliance item is identified was included in the procedures. Although the TRA rules and state statute is listed on the cover letter, it was suggested the civil penalty amounts for non-compliance be provided in the letter.

b. Written procedures in reviewing compliance actions is included in Section T entitled, Notice of Probable Violation Tracking.

- |          |                                                                                                                                                                                                                                                                      |                                                               |                                         |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|-----------------------------------------|
| <b>2</b> | Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1<br>Yes = 4 No = 0 Needs Improvement = 1-3 | 4                                                             | 4                                       |
| a.       | Were compliance actions sent to company officer or manager/board member if municipal/government system?                                                                                                                                                              | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b.       | Document probable violations                                                                                                                                                                                                                                         | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c.       | Resolve probable violations                                                                                                                                                                                                                                          | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d.       | Routinely review progress of probable violations                                                                                                                                                                                                                     | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e.       | Were applicable civil penalties outlined in correspondence with operator(s)                                                                                                                                                                                          | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

### Evaluator Notes:

- a. Yes, a review of records indicate this is being performed. TRA has a document entitled, "GPSD Natural Gas Operator Directory" that list all company officers or managers.
- b. Yes, probable violations are documented and entered into a spreadsheet, file card and risk model sheet.
- c. Probable violations are resolved by waiting for information from the operator or follow-up inspection.
- d. Inspector and Administrative assistant reviewing Violations quarterly during the year.
- e. Yes, civil penalties are provided in correspondence to the operator.
- c.

- |          |                                                                                                                        |   |   |
|----------|------------------------------------------------------------------------------------------------------------------------|---|---|
| <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, TRA issued forty-two compliance actions against operators in Tennessee.

- |          |                                                                                                                                   |   |   |
|----------|-----------------------------------------------------------------------------------------------------------------------------------|---|---|
| <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, all operators had the opportunity to request a show cause hearing or agree to a settlement offer.

- |          |                                                                                                                                                                                                                                                                                           |   |   |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <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, in previous years Program Manager has assessed civil penalties and negotiated settlement agreements. The largest civil penalty assessed in CY 2015 was \$100,000 against Memphis Gas, Light & Water due to an incident that occurred.

---

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

Evaluator Notes:

Yes, the civil penalty and settlement agreement with Memphis Gas, Light & Water is an example of using their enforcement authority.

---

7	General Comments: 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: 15  
Total possible points for this section: 15



## PART E - Incident Investigations

Points(MAX) Score

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

Evaluator Notes:

Yes, this is listed in Section VI of TRA Gas Pipeline Safety Division Safety Program Plan Inspection, Enforcement & Incident Investigation Procedures.

- 2 Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? And did state keep adequate records of Incident/Accident notifications received? Chapter 6 2 2  
Yes = 2 No = 0 Needs Improvement = 1

- a. Acknowledgement of MOU between NTSB and PHMSA (Appendix D) Yes ☒ No ☐ Needs Improvement ☐  
b. Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E) Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

Yes, this is listed in Section H of TRA Gas Pipeline Safety Division Safety Program Plan Inspection, Enforcement & Incident Investigation Procedures. Although this is listed and reference to the Guidelines for States Participating in the Pipeline Safety Program it is recommend these documents be included in the procedures manual.

- 3 If onsite investigation was not made, did state obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, this item is listed in Section VI, B, page 14 of TRA Gas Pipeline Safety Division Safety Program Plan Inspection, Enforcement & Incident Investigation Procedures

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

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

Evaluator Notes:

In CY2015 there were three incidents that occurred. They were Powell Clinch Utility District, Chattanooga Gas Company and City of Lafayette Gas & Utilities Department. A review of files found a detailed report was completed on each incident. Contributing factors and recommendations to prevent recurrence was listed.

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

Evaluator Notes:

No violations were cited due to the cause of the incidents.

- 6 Did the state assist region office by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, TRA assisted the PHMSA Southern Region by keeping them informative of the three incidents as they were investigated. Emails to Chris Taylor on each incident provided information on probable causes of the incidents and insured the incident reports were filed correctly.

---

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

Evaluator Notes:

Yes, Annette Ponds continued to provide information about the three incidents at the 2016 NAPSAR Southern Region meeting. She shared information about their investigation and probable causes of the incidents.

---

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

Evaluator Notes:

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

---

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



## PART F - Damage Prevention

Points(MAX) Score

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

Evaluator Notes:

Yes, this is listed on the Standard inspection form and Pete Hunt provided an overview of this item on August 25, 2015 in Oak Ridge, TN to several operators at the Safe Day Meeting.

- |   |                                                                                                                                                                                                                                                                     |   |   |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 2 | Did the state inspector check to assure the pipeline operator is following its written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system?<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

Yes, this is checked on each inspection. A review of this information is reviewed with the operator at the beginning or exit interview.

- |   |                                                                                                                                                                                                                                                                            |   |   |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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 at Tennessee Gas Association Annual Conference and meetings with operators.

- |   |                                                                                                                                                                                                                                                                                            |   |   |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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, this is being accomplished in TRA's review of the operator's annual report. Information collected is used in the risk ranking model for inspections.

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

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

Name of Operator Inspected:

Knoxville Utilities Board (KUB)

Name of State Inspector(s) Observed:

Travis Aslinger, Engineer; Shinisha Freeman, Engineer; Pete Hut, Engineer; Tim Thompson, Engineer

Location of Inspection:

Knoxville, TN

Date of Inspection:

August 10-11, 2016

Name of PHMSA Representative:

Glynn Blanton, PHMSA State Programs

Evaluator Notes:

Travis Aslinger was the lead inspector on this standard inspection of KUB. TRA inspectors Pete Hut conducted the Regulator & Reliefs valve review, Shinisha Freeman reviewed cathodic protection on the distribution lines and Tim Thompson checked the company's valves & odorization levels.

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

Evaluator Notes:

Yes, Travis Aslinger, TRA Engineer, contacted David Kyle, KUB Regulatory Specialist, on February 25, 2016 pertaining to scheduling the standard inspection.

- 3 Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, Travis Aslinger used the Federal Standard Inspection form with some modifications to the form relative to TRA rules and regulations.

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

Evaluator Notes:

Yes, it was observed Travis Aslinger asking good questions about the company's records to KUB representatives and documenting the answers provided into the Federal Standard Inspection form. He conducted a very professional inspection.

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

Evaluator Notes:

Yes, KUB provided records and their procedure manual. No areas of concern.

- 6 Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

a. Procedures

☒

b. Records

☒

c. Field Activities

☒

d. Other (please comment)

☐

Evaluator Notes:

Yes, observed Pete Hut recording information on regulator and relief forms about the stations checked during the field inspection. Additionally, observed and noted Shinisha Freeman and Tim Thompson also recording information about their field inspections into the inspection forms. Each inspector did a thorough inspection.

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

Evaluator Notes:

Yes, Travis Aslinger has completed five of the seven basic gas courses at TQ. He has two years of experience in the pipeline safety program. He has a basic understanding of the regulations and conducting a professional inspection of the KUB's records.

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

Evaluator Notes:

The exit interview was scheduled with KUB on Friday, August 12, 2016 and this writer was not present.

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

Evaluator Notes:

The exit interview was scheduled with KUB on Friday, August 12, 2016 and this writer was not present.

- |    |                                                                                                                                                                                                                                                                                                     |           |           |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|
| 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.<br>Info Only = No Points | Info Only | Info Only |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|

- |    |                               |                                     |
|----|-------------------------------|-------------------------------------|
| a. | Abandonment                   | <input checked="" type="checkbox"/> |
| b. | Abnormal Operations           | <input checked="" type="checkbox"/> |
| c. | Break-Out Tanks               | <input type="checkbox"/>            |
| d. | Compressor or Pump Stations   | <input type="checkbox"/>            |
| e. | Change in Class Location      | <input checked="" type="checkbox"/> |
| f. | Casings                       | <input checked="" type="checkbox"/> |
| g. | Cathodic Protection           | <input checked="" type="checkbox"/> |
| h. | Cast-iron Replacement         | <input type="checkbox"/>            |
| i. | Damage Prevention             | <input checked="" type="checkbox"/> |
| j. | Deactivation                  | <input type="checkbox"/>            |
| k. | Emergency Procedures          | <input checked="" type="checkbox"/> |
| l. | Inspection of Right-of-Way    | <input type="checkbox"/>            |
| m. | Line Markers                  | <input checked="" type="checkbox"/> |
| n. | Liaison with Public Officials | <input checked="" type="checkbox"/> |
| o. | Leak Surveys                  | <input checked="" type="checkbox"/> |
| p. | MOP                           | <input type="checkbox"/>            |
| q. | MAOP                          | <input type="checkbox"/>            |
| r. | Moving Pipe                   | <input type="checkbox"/>            |
| s. | New Construction              | <input type="checkbox"/>            |
| t. | Navigable Waterway Crossings  | <input type="checkbox"/>            |
| u. | Odorization                   | <input checked="" type="checkbox"/> |
| v. | Overpressure Safety Devices   | <input checked="" type="checkbox"/> |
| w. | Plastic Pipe Installation     | <input type="checkbox"/>            |
| x. | Public Education              | <input type="checkbox"/>            |
| y. | Purging                       | <input type="checkbox"/>            |

z.	Prevention of Accidental Ignition	<input type="checkbox"/>
A.	Repairs	<input type="checkbox"/>
B.	Signs	<input checked="" type="checkbox"/>
C.	Tapping	<input type="checkbox"/>
D.	Valve Maintenance	<input checked="" type="checkbox"/>
E.	Vault Maintenance	<input type="checkbox"/>
F.	Welding	<input type="checkbox"/>
G.	OQ - Operator Qualification	<input checked="" type="checkbox"/>
H.	Compliance Follow-up	<input type="checkbox"/>
I.	Atmospheric Corrosion	<input checked="" type="checkbox"/>
J.	Other	<input type="checkbox"/>

Evaluator Notes:

It was observed Travis Aslinger reviewing KUB operation and maintenance records, Pete Hut checking set pressure and reliefs at regulator & reliefs valve stations, Shinisha Freeman checking isolated service lines and Tim Thompson observing emergency valves being located and turned for operation of the valve. One areas of concern was noted at a regulator station that had an overhead electrical line directly above the station. This area of concern will be discussed with KUB at the exit interview. All individuals performed a professional inspection.

---

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



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

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

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

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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