



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

VERMONT DEPARTMENT OF PUBLIC SERVICE

### 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:** Vermont

**Agency Status:**

**Date of Visit:** 07/19/2016 - 07/21/2016

**Agency Representative:** GC Morris, Program Manager

**PHMSA Representative:** Rex Evans

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

**Name/Title:** Mr. Christopher Reccia, Commissioner

**Agency:** Vermont Public Service Department

**Address:** 112 State Street

**City/State/Zip:** Montpelier, VT 05620

**Rating:**

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

## INSTRUCTIONS:

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

## Field Inspection (PART G):

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

## Scoring Summary

PARTS	Possible Points	Points Scored
A Progress Report and Program Documentation Review	10	8
B Program Inspection Procedures	13	13
C Program Performance	46	39
D Compliance Activities	15	11
E Incident Investigations	5	5
F Damage Prevention	8	8
G Field Inspections	12	12
H Interstate Agent State (If Applicable)	0	0
I 60106 Agreement State (If Applicable)	0	0
<b>TOTALS</b>	<b>109</b>	<b>96</b>
<b>State Rating .....</b>		<b>88.1</b>

# PART A - Progress Report and Program Documentation Review

Points(MAX) Score

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

1 1

Evaluator Notes:

No issues with information reported

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

1 1

Evaluator Notes:

No issues found. Recommend evaluation of how many days spending at VGS be looked at for distribution inspections.

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

1 1

Evaluator Notes:

No issues

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

1 1

Evaluator Notes:

No incidents, no issues

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

1 0

Evaluator Notes:

Continued issue, numbers did not reconcile with file. Again a thorough review needed to make sure accurate and up to date.

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

2 1

Evaluator Notes:

While improvement is being made again, further improvement in file organization needed.

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

1 1

Evaluator Notes:

No issues.

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

1 1

Evaluator Notes:

No issues

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

1 1



Evaluator Notes:

No issues, possible enhancement needed and recommended evaluating that.

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**10** General Comments:

Info Only = No Points

Info Only

Evaluator Notes:

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Total points scored for this section: 8  
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:

Procedures were updated since last evaluation. Pre,Inspection and Post inspection activities are generally covered. Starting page 4 of procedures. No issues.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Generally covered pointing to inspection forms used and time frames.

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

Generally covered including applicable inspection forms and time frames.

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

Included as part of standard inspection using standard inspection form.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Generally covered in procedures. As needed only.

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

Uses PHMSA form-5, which is primarily for steel. Recommend adding checklist and enhancing procedures for plastic construction and how interactions with operator take place.

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

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

- a. Length of time since last inspection (Within five year interval)

Yes  No  Needs Improvement

- b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) Yes  No  Needs Improvement
- c. Type of activity being undertaken by operators (i.e. construction) Yes  No  Needs Improvement
- d. Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc) Yes  No  Needs Improvement
- e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors) Yes  No  Needs Improvement
- f. Are inspection units broken down appropriately? Yes  No  Needs Improvement

Evaluator Notes:

Priorities are addressed on page 7 of procedures. VT has limited operator base. Inspection units not an issue.

**8** General Comments:

Info Only = No Points

Info Only Info Only

Evaluator Notes:

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):  
 147.00  
 B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
 220 X 0.92 = 201.67  
 Ratio: A / B  
 147.00 / 201.67 = 0.73  
 If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0  
 Points = 5

Evaluator Notes:

Ratio is .73, 147 days achieved with .92 inspectors. McCauley inspections are part time dedicated to VGS transmission project.

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

Evaluator Notes:

All training appears completed, no issues. Recommended taking LPG class

- 3** Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1 2 2  
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

No knowledge issues

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

Evaluator Notes:

Letter was received, still need work on various deficiencies and progress is being made but not there yet.

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

Evaluator Notes:

Hosted the New England seminar in CY2015

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

Evaluator Notes:

After thorough review, although progress is being made, have to now give only one point on this question. Effort made to



get small operators up to date on OQ, DIMP and PAPEI inspections, but still standard inspection records are not complete on Vermont Gas and the standard inspections of remaining operators. As indicated, a start is made but still need significant improvement. Two points deducted last year and four this year as still not caught up.

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7	Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1 Yes = 2 No = 0 Needs Improvement = 1	2	0
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Evaluator Notes:  
While inspection forms have been in place for the most part, All parts of inspection forms are not completed and while a very small amount of progress made, significant improvement needed. This is a continuing issue and two points deducted.

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8	Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Chapter 5.1 Yes = 1 No = 0	1	NA
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Evaluator Notes:  
No cast iron

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

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10	Did the state review operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21? (NTSB) Chapter 5.1 Yes = 1 No = 0	1	1
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Evaluator Notes:  
Giving full points as part of checklist, and was highlight in company provided procedures, but needs to make sure entire checklist is completed on all operators.

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11	Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 192.617? Chapter 5.1 Yes = 1 No = 0	1	1
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Evaluator Notes:  
As above, giving points since part of checklist. Notes to question above also apply here.

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12	Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues? Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:  
Information is reviewed, charts have been produced showing various metrics. No issues.

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13	Did state input all applicable OQ, DIMP/IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1 Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:  
All appear to be up to date as completed.



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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? Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:  
VGS only operator - NPMS reviewed

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<b>15</b>	Is the state verifying operators are conducting drug and alcohol tests as required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199 Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:  
VGS due again this year, LPG not applicable

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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 Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:  
Large effort since last evaluation to get up to date. This was issue from last time, but verified enough to get full points.

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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 O Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:  
VGs only transmission operator. Regular review of transmission due to new construction presently going on. Again recommended annual review with VGS on IMP and DIMP and also make clear in procedures what they are doing annually.

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<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 Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:  
It appears all propane operators were caught up since last inspection per summary provided of dates inspected. Again, with DIMP recommend annual sitdown with VGS and update procedures accordingly.

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<b>19</b>	Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. 49 CFR 192.616 (I13-16) PAPEI Effectiveness Inspections should be conducted every four years per RP1162 Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:  
Appears that all operators had PAPEI inspections caught up. Ok to have Michelle take WBT and do inspections.

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

21	Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 Yes = 1 No = 0 Needs Improvement = .5	1	NA
Evaluator Notes: None			
22	Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns? Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: Vermont Gas participates in PPDC, no issues.			
23	Did the state participate in/respond to surveys or information requests from NAPSRS or PHMSA? Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: No issues.			
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. No = 0 Needs Improvement = .5 Yes = 1	1	NA
Evaluator Notes: No waivers present, not applicable.			
25	Did the state attend the National NAPSRS Board of Directors Meeting in CY being evaluated? No = 0 Needs Improvement = .5 Yes = 1	1	1
Evaluator Notes: Yes			
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> 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"/>
b.	NTSB P-11-20 Meaningful Metrics	Yes <input checked="" type="radio"/>	No <input type="radio"/>
Evaluator Notes: Discussion on metrics. No issues.			
27	General Comments: Info Only = No Points	Info Only Info Only	
Evaluator Notes:			

Total points scored for this section: 39  
Total possible points for this section: 46

# PART D - Compliance Activities

Points(MAX) Score

- |    |  |                                      |  |
|----|--|--------------------------------------|--|
| 1  | Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1<br>Yes = 4 No = 0 Needs Improvement = 1-3 | 4                                    | 4  |
| a. | Procedures to notify an operator (company officer) when a noncompliance is identified  | Yes <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:

General follow-up information noted in procedures. Recommend enhancing compliance procedure section to also include this information with time-defined follow-up.

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

Evaluator Notes:

Continued issue, and due to lag in compliance actions being issued to companies, only one letter went out in CY2015 and none yet in CY2016. Two point deduction.

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

Evaluator Notes:

No, all still have not been followed through and need to be brought up to date. Not issuing letters in timely fashion. See above, only one letter went out in CY2015 and none yet in CY2016.

- |   |   |   |   |
|---|---|---|---|
| 4 | Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary.<br>Yes = 2 No = 0 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

No issues with process available

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

Evaluator Notes:

no issues with process

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

Evaluator Notes:

Last time was in CY2008-CY2009 as noted last year. VGS settled for fine of \$51000. so no issues for now.

- |   |                   |           |           |
|---|-------------------|-----------|-----------|
| 7 | General Comments: | Info Only | Info Only |
|---|-------------------|-----------|-----------|

Info Only = No Points

Evaluator Notes:

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Total points scored for this section: 11  
Total possible points for this section: 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:  
 Procedures in place.

**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:  
 No issues.

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

Evaluator Notes:

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

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

Evaluator Notes:  
 N/A

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

Evaluator Notes:  
 N/A

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

Evaluator Notes:

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

Evaluator Notes:



No issues

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

Info Only|Info Only

Evaluator Notes:

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Total points scored for this section: 5  
Total possible points for this section: 5



**PART F - Damage Prevention**

**Points(MAX) Score**

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- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | 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 - VGS procedures ok

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- |          |   |   |   |
|----------|---|---|---|
| <b>2</b> | 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:  
Part of checklist

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- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | 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:  
Al St. Peter of VTDPS staff and GC involved. No issues

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- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | 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:  
Part of metrics no issues

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

Evaluator Notes:

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



# PART G - Field Inspections

Points(MAX) Score

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

Name of Operator Inspected:  
 Vermont Gas and Proctor Gas (LPG)  
 Name of State Inspector(s) Observed:  
 GC Morris, John McCauley  
 Location of Inspection:  
 Burlington, Vt and Proctor Vt.  
 Date of Inspection:  
 July 21 and July 23, 2016  
 Name of PHMSA Representative:  
 Rex Evans

Evaluator Notes:  
 Brief observation of Vermont Gas 42 miles-3 year transmission project. Standard inspection conducted on Proctor Gas - results of this Part G of evaluation will be completed but subject to change. Have requested inspection be completed in full and documentation forward to PHMSA by November 1, 2016.

**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:  
 VGS - had meeting with operator in advance. No issues.  
 Proctor Gas - the audit was previously scheduled and operator was on hand and no issues.

**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:  
 Inspection form was being used. Results of the inspection will be pending receipt of fully completed inspection form by November 1, 2016.

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

Evaluator Notes:  
 Inspection results were in process of being written down. Results of the inspection will be pending receipt of fully completed inspection form by November 1, 2016.

**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:  
 this only applies to VGS transmission inspection and no issues were found.

**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:



No issues with VGS portion. Proctor gas had no issues while I was on site, but results of the inspection will be pending receipt of fully completed inspection form by November 1, 2016.

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

No issues with knowledge of issues viewed but results of the inspection will be pending receipt of fully completed inspection form by November 1, 2016.

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

the VGS transmission project is on-going and the Proctor Gas inspection was not entirely complete upon end of evaluation. Results of the inspection will be pending receipt of fully completed inspection form by November 1, 2016. This will include any communication to operator on compliance issues.

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

Results of the inspection will be pending receipt of fully completed inspection form by November 1, 2016.

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<b>10</b>	General Comments: 1) What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) 2) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) 3) Other. Info Only = No Points	Info Only	Info Only
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- |    |                               |                                     |
|----|-------------------------------|-------------------------------------|
| a. | Abandonment                   | <input type="checkbox"/>            |
| b. | Abnormal Operations           | <input type="checkbox"/>            |
| c. | Break-Out Tanks               | <input type="checkbox"/>            |
| d. | Compressor or Pump Stations   | <input type="checkbox"/>            |
| e. | Change in Class Location      | <input type="checkbox"/>            |
| f. | Casings                       | <input type="checkbox"/>            |
| g. | Cathodic Protection           | <input type="checkbox"/>            |
| h. | Cast-iron Replacement         | <input type="checkbox"/>            |
| i. | Damage Prevention             | <input type="checkbox"/>            |
| j. | Deactivation                  | <input type="checkbox"/>            |
| k. | Emergency Procedures          | <input type="checkbox"/>            |
| l. | Inspection of Right-of-Way    | <input type="checkbox"/>            |
| m. | Line Markers                  | <input type="checkbox"/>            |
| n. | Liaison with Public Officials | <input type="checkbox"/>            |
| o. | Leak Surveys                  | <input type="checkbox"/>            |
| p. | MOP                           | <input type="checkbox"/>            |
| q. | MAOP                          | <input type="checkbox"/>            |
| r. | Moving Pipe                   | <input type="checkbox"/>            |
| s. | New Construction              | <input checked="" type="checkbox"/> |
| t. | Navigable Waterway Crossings  | <input type="checkbox"/>            |
| u. | Odorization                   | <input type="checkbox"/>            |
| v. | Overpressure Safety Devices   | <input 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
- A. Repairs
- B. Signs
- C. Tapping
- D. Valve Maintenance
- E. Vault Maintenance
- F. Welding
- G. OQ - Operator Qualification
- H. Compliance Follow-up
- I. Atmospheric Corrosion
- J. Other

Evaluator Notes:

Results of the inspection will be pending receipt of fully completed inspection form by November 1, 2016.

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Total points scored for this section: 12  
Total possible points for this section: 12



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

**Points(MAX) Score**

**1** Did the state use the current federal inspection form(s)? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

**2** Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

**3** Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

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

Evaluator Notes:

**5** Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

**6** Did the state give written notice to PHMSA within 60 days of all probable violations found? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

**7** Did the state initially submit documentation to support compliance action by PHMSA on probable violations? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

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

Evaluator Notes:

Not an interstate agent

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



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

**Points(MAX) Score**

**1** Did the state use the current federal inspection form(s)? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

**2** Are results documented demonstrating inspection units were reviewed in accordance with state inspection plan? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

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

Evaluator Notes:

**4** Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

**5** Did the state give written notice to PHMSA within 60 days of all probable violations found? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

**6** Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

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

Evaluator Notes:

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

