

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

## 2016 Gas State Program Evaluation

for

FLORIDA PUBLIC SERVICE COMMISSION, Bureau of Safety

### 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)



# 2016 Gas State Program Evaluation -- CY 2016

Gas

**State Agency:** Florida

**Agency Status:**

**Date of Visit:** 03/27/2017 - 04/14/2017

**Agency Representative:** Rick Moses, Safety Bureau Chief  
Wendi Denison, Staff Assistant  
Tom Ballinger, Director of Engineering  
Marcelina Alvarez, Engineer 1  
Moise Degand, Engineer 1  
Karl Chen, Supervisor

**PHMSA Representative:** Glynn Blanton, USDOT/PHMSA State Programs  
David Appelbaum, USDOT/PHMSA State Programs

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

**Name/Title:** Julie I. Brown, Chairman  
**Agency:** Florida Public Service Commission  
**Address:** 2540 Shumard Oak Boulevard  
**City/State/Zip:** Tallahassee, FL 32399-0868

**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 2016 (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  
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)

10 9  
13 13  
48 46  
15 15  
11 10  
8 8  
11 11  
0 0  
0 0

### TOTALS

116 112

**State Rating** .....

96.6

## PART A - Progress Report and Program Documentation Review

Points(MAX) Score

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

Evaluator Notes:

Information was entered correctly. Reviewed action being taken to obtain full jurisdiction on all facilities. Florida State Statute gives jurisdictional authority over Master Meter operators that sub-meter to customers only. This law has not changed in the last year.

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

Evaluator Notes:

Reviewed inspection-person day activity results to individual time sheets. Information recorded was found correct for all activities. Verified damage prevention inspections only pertained to section 192.614. No areas of concern.

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

Evaluator Notes:

Information was correct with operator ID and inspection units. Inspection units are determined by private systems on the number of divisions and area of service. Municipalities and utility districts are separate inspection units and stand alone.

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

Evaluator Notes:

Yes, three reportable incidents occurred in CY2016. All reports were listed and information was correct.

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

Evaluator Notes:

Reviewed past violations and violations found during the year for accuracy. Conducted a review of carryover violations and found the numbers were incorrect. The carryover number should be 68. This error resulted in a required change to the CY2016 Progress Report. A loss of one point occurred due to this error. Improvement is needed in reporting all violations correctly.

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

Evaluator Notes:

Yes, information was available on spreadsheets, office files and data bases.

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

Evaluator Notes:

Reviewed information on each inspector and compared completion courses to TQ records. All inspectors exempt Kadmiel Beauvais, have completed all the mandatory training for a Gas Standard Inspector. Three inspectors have completed all the required courses for Gas IM and six inspectors have completed the DIMP required courses. Two inspectors have completed the Root Cause/Incident Investigation course.

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

Evaluator Notes:

Yes, reviewed information and found correct. Suggested to program manager to use the note section of the attachment to explain action being taken to adopt regulations.

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

Evaluator Notes:

Yes, a list of detailed information on accomplishments and future activities was provided. Good description on meeting the nine elements of an effective damage prevention program was provided.

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

Evaluator Notes:

A loss of half a point occurred on Question A.5 due to error in attachment 5 of progress report. The number of carryover violations and violations found during the year was incorrect.

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Total points scored for this section: 9  
Total possible points for this section: 10



## PART B - Program Inspection Procedures

Points(MAX) Score

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

Yes = 2 No = 0 Needs Improvement = 1

**Evaluator Notes:**

Yes. Florida Public Service Commission's Standard Operating Procedures, Section 1111 contains pre-inspection, inspection and post inspection procedures. This information is listed on pages 27-28.

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

Yes. Florida Public Service Commission's Standard Operating Procedures, Section 1111 page 27, address this item. All large operators are reviewed annually pertaining to reviewing the DIMP plan and actions taken by the operator in monitoring their action. A review of GT Integrity Management data base found five inspections were performed by staff. They were City Gas of Florida, Florida Public Utilities Company, Peoples Gas Company, City of Lakeland Dept. of Electric and Continental Building Products. A review of DIMP data base found 34 inspection reports were upload but this number is different from the 57 inspections performed. All inspection reports have not been uploaded into the data base. Improvement is needed in following written procedures.

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

Yes. Florida Public Service Commission's Standard Operating Procedures, Section 1111, C. Procedures, Inspection Activities, (a) address OQ procedures. This information is located on pages 27-28.

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

Yes. Florida Public Service Commission's Standard Operating Procedures, Section 1111, C. Procedures, Inspection Activities, (a) address Public Awareness/Damage Prevention procedures. This information is located on pages 27.

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

Yes = 1 No = 0 Needs Improvement = .5

**Evaluator Notes:**

Program Manager Rick Moses attend and presented information at the Florida Natural Gas Association Meeting in April, 2016 and APGA Meeting in March 29, 2016.

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

7	Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? Yes = 6 No = 0 Needs Improvement = 1-5	6	6
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:

FL PSC inspects all operators annually not to exceed 15 months using the standard inspection form. All DIMP inspections are performed annually not to exceed 2 years. A standard inspection is performed on each operator by checking procedures, maintenance records, odorization, valves and other components in the system. Each inspector will review the operator's compliance history, length of time since last inspection, type of inspections previously performed and violations cited along with other information about the operator in the FL PSC data base program. Inspectors are assigned a region location in the state to perform inspections on operators and they are rotated. All inspection units were reviewed and found to be broken down correctly by divisions in private systems and single units for municipality and utility district. Inspection priorities are listed in Florida Public Service Commission's Standard Operating Procedures, Section 1111, A, page 27

8 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

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

Total points scored for this section: 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):  
911.23

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
 $220 \times 8.35 = 1837.73$

Ratio: A / B  
 $911.23 / 1837.73 = 0.50$

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)= 911.23

B.Total Inspection Person Days Charged to the program( $220 \times$ Number of Inspection person years(Attachment 7)=1837.73304

Formula:- Ratio = A/B =  $911.23/1837.73304 = 0.5$  Thus, Full 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:

a. All inspectors have completed except Kadmiel Beauvais the OQ training courses before conducting an OQ inspection. b. Marcelina Alvarez, Karl Chen, James McRoy, Robert Simpson have completed the DIMP courses and are lead inspectors on each DIMP inspection. C. Karl Chen, Marcelina Alvarez and Robert Simpson are the IMP lead inspectors. Karl Chen and Farhan Alnajjar have taken the Root Cause Analysis course. d. No outside training has been completed by FL PSC staff members in CY2016. e. The following inspectors have completed the required courses to perform gas standard inspections: Alnajjar Farhan, Marcelina Alvarez, Hassan Badran, Karl Chen, James McRoy, Rick Moses, Robert Simpson, Tony Velazquez & Norman Witman.

- 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, Rick Moses has completed all required courses at TQ and qualified to conduct gas safety inspections. He is in the six year as the agency's program manager.

- 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 Julie Brown response letter to Zach Barrett was received on August 9, 2016 and within the sixty-day time requirement.

- 5 Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5 1 1  
Yes = 1 No = 0

Evaluator Notes:

Yes, FL PSC held a pipeline safety seminar in Tallahassee, FL on April 7-8, 2015. Rick Moses has requested a seminar from TQ to be held in Florida for calendar year 2017.

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

Evaluator Notes:

Yes, all operators are inspected once a year not to exceed 15 months. Conducted a review of inspection records and spreadsheets to confirm all inspection units were inspected in CY2016. The results found all inspection units were inspected in accordance to their procedures.

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

Evaluator Notes:

Yes. FL PSC continues to use their inspection forms along with federal forms. The forms contain all federal regulations and State of Florida or FL PSC regulations that are enforceable by the agency. The following federal forms are used: PHMSA Form 13 Drug and Alcohol, PHMSA OQ Inspection form 14, Field Inspection form 15, Public Awareness Plan Form 21, and PHMSA Gas Integrity Management Inspection Protocols. FL PSC forms are as follows: GS-1 New Construction Requirements Checklist, GS-3 Operation and Maintenance Requirements Checklist, GS-5 Pressure Regulating Station Data Checklist, GS-6 Odorization Checklist, GS-13 Annual Natural Gas Pipeline Safety Summary, GS-9 Construction Inspection Checklist Visual, GS-10 Gas Incident/Accident Inspection Checklist, GS-12 Special Drug /Alcohol Programs and GS 14 Valve Survey

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

Evaluator Notes:

Yes, FL PSC form GS-3 Inspection and Maintenance Requirements Checklist pages 11-12 covers this item pertaining to cast iron pipe.

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

Evaluator Notes:

Yes, this item is covered in GC-3 Inspection and Maintenance Requirement form.

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

Evaluator Notes:

Yes. This is addressed in GS-3 Inspection and Maintenance Requirements Checklist pages 3-4, under Emergency Plans.



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

Evaluator Notes:

Yes, this item is listed in GS-3 Inspection and Maintenance Requirements Checklist page 5, under Failure Investigation Procedures.

- 12 Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues? 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

FL PSC requires all operators to submit their annual report to their agency. After submission is completed a review of the reports are performed by the Program Manager. If inconsistencies are found the operator is notified. The annually reports are also checked for accuracy during all gas safety inspections. The reports are used to produce an annual report posted on FL PSC website.

- 13 Did state input all applicable OQ, DIMP/IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1 2 0  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

No. A review of OQ & IMP inspection results found all DIMP & OQ reports were not submitted into the data base. Only thirty-four of fifty-eight IMP inspection reports were submitted and 169 of the 174 OQ reports were submitted in a timely manner. All reports are to be submitted in a timely schedule as listed in FL PSC procedure manual. A loss of 2 point occurred due to failure to submit all IMP and OQ reports into the data base.

- 14 Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission? 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, this item is reviewed with the operator and listed on FL PSC form GC 13. A review of several inspection reports show this item was checked.

- 15 Is the state verifying operators are conducting drug and alcohol tests as required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, this item is reviewed with the operator and listed on FL PSC form GC 13

- 16 Is state verifying operators OQ programs are up to date? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals determined in the operators plan. 49 CFR 192 Part N 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, this item is reviewed with the operator and listed on FL PSC form GC 13

- 17 Is state verifying operator's gas transmission integrity management programs (IMP) are up to date? This should include a previous review of IMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review should take in to account program review and updates of operators plan(s). (Are the State's largest operators programs being contacted or reviewed annually?). 49 CFR 192 Subpart 0 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, FL PSC inspectors use the federal gas transmission integrity form to monitor the operator's plan, tests and remedial action relative to the integrity management program. During the inspection they review previous action and updates.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>18</b> | Is state verifying operator's gas distribution integrity management Programs (DIMP)?<br>This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). (Are the State's largest operators programs being contacted or reviewed annually?). 49 CFR 192 Subpart P DIMP ? First round of program inspections should have been complete by December 2014<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|
- 

Evaluator Notes:

Yes. A review of inspection files confirm all operators had a DIMP inspection in CY2013. In CY2015 twenty-seven DIMP inspections were performed. In CY2016 fifty-seven inspections were performed. The inspection reviewed all updates and changes that may have occurred from the previous year.

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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. PAPEI Effectiveness Inspections should have been completed by December 2013. PAPEI Effectiveness Inspections should be conducted every four years by operators. 49 CFR 192.616<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|
- 

Evaluator Notes:

Yes, FL PSC uses the federal form 21, PAPEI, to verify this information. All operators were inspection by the end of CY2014. In CY2016, sixty-nine public awareness inspections were performed.

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

Evaluator Notes:

Yes, this is accomplished via the FL PSC website.

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

Evaluator Notes:

Yes, one Safety Related Condition was reported on April 9, 2015 by Florida City Gas. The issue was four anomalies located on a 12-inch pipeline. Operating pressure on the pipeline was lowered and operator scheduled to replace the pipeline in CY2016. FL PSC observed the replacement of the pipeline and the safety related condition report was not closed until October 18, 2016.

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

Evaluator Notes:

Yes, this item is continually reviewed and checked on the standard inspection form.

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

Evaluator Notes:

Yes, Rick Moses has responded to monthly NAPSRS surveys as confirmed by Robert Clarillos, NAPSRS Administrative Manager.

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

Evaluator Notes:

NA

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

Evaluator Notes:

Yes, Rick Moses attended the NAPS Board of Directors Meeting in Indianapolis, Indiana.

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

- a. Discussion of Potential Accelerated Actions (AA's) based on any negative trends Yes ☒ No ☐ Needs Improvement ☐  
b. NTSB P-11-20 Meaningful Metrics Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

Reviewed each of the six metrics listed on State of Florida. Information showed an upward trend in leaks outstanding and hazardous leaks. Reviewed operator's annual report and found in Section "C" a high number of damages and leaks to be repaired at end of year. It was suggested to the Program Manager potential AA action needs to be taken to monitor this item during the annual report reviews and with the operator.

- 27 Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool. (No points) Info Only Info Only  
Info Only = No Points

Evaluator Notes:

Reviewed the State Inspection Calculation Tool (SICT) with Program Manager and found high numbers in the number of inspection person days for Peoples Gas (199), Central Florida Gas (365) Florida Public Utilities (69.5) and Florida City Gas (46.5). It was agreed to review these number and adjust the days when the SIDT program is opened in April or May.

The CY2017 inspection person days of 1119 is incorrect and needs to be lowered to the current number of inspection person days of 900 for the current CY2016 progress report

- 28 Did the State verify Operators took appropriate action regarding Pipeline Flow Reversals, Info Only Info Only  
Product Changes and Conversions to Service? See ADP-2014-04 (No Points)  
Info Only = No Points

Evaluator Notes:

NA. FL PSC does not have a hazardous liquid safety program.

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

Evaluator Notes:

A loss of two points occurred in Question C.13.

Total points scored for this section: 46  
Total possible points for this section: 48

## 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"/> |
| c.       | Procedures regarding closing outstanding probable violations   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

### Evaluator Notes:

- a. Reviewed FL PSC Standard Operating Procedures and noted description of this requirement is listed in SOP 1123, D. OPERATOR VIOLATION NOTICE PROCEDURES: 3. A cover letter identifying the violation and title of the violation rule is attached to the inspection files from the field inspector and sent to an officer or CEO of a private company (Mayor or City Manager for municipalities).
- b. This procedure is listed in Section 4,5 & 6. Monthly reports are generated from support staff to monitor responses.
- c. Section 7-10 pertains to procedures to close the probable violations. Once a response is received from the operator, the field inspector will re-inspect to ensure appropriate corrective action is taken. A closure letter is sent to the operator to close the violation if appropriate action was taken.

- |          |  |   |   |
|----------|--|---|---|
| <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. Reviewed thirty compliance letters mailed to operators in CY2016 and confirmed they were mailed to company officer or manager. No issues.
- b. Selected and reviewed thirty inspection reports and found probable violations were documented correctly.
- c. Inspection reports and database confirmed probable violations were resolved within a reason time and reviewed by the inspector and program manager.
- d. Yes, program manager routinely reviews probable violations monthly and when the reports are submitted by the inspector for approval.
- e. Yes, reviewed compliance letters to company officers and found in the last paragraph of the letter the following wording, "Failure to not take corrective action may result in a penalty of \$25,000 per day for each day that the violation exists, up to \$500,000 for related violations as provided in 368.061 F.S."

- |          |  |   |   |
|----------|--|---|---|
| <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, reviewed the seventy written compliance letters sent to operators pertaining to non-compliance with the pipeline safety regulations. Letters and attached inspection reports listed the violations found and action that needed to be taken to correct the violations.

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

Operators are given the option to request a hearing with the FL PSC via legal counsel if the violation(s) cannot be corrected within a reasonable time schedule with the program manager.

---

- |          |   |   |   |
|----------|---|---|---|
| <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, FL PSC issues a civil penalty in the amount of \$1 million plus a \$2 million credit for a pipeline replacement program on cast iron and bare steel against TECO in CY2016. This was the first civil penalty that was cited and collected from a natural gas operator in the State of Florida.

---

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | 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:

Yes, the civil penalty cited and collected from TECO Gas Company in CY2016.

---

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>7</b> | 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: 15  
Total possible points for this section: 15



## PART E - Incident Investigations

Points(MAX) Score

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

Evaluator Notes:

Yes, this is listed in FL PSC Standard Operating Procedures 1122.

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

- |    |  |                                      |                          |   |
|----|--|--------------------------------------|--------------------------|---|
| a. | Acknowledgement of MOU between NTSB and PHMSA (Appendix D)                             | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

- a. Yes, FL PSC requires all operators to telephonically notify Program Manager or Region Pipeline Safety Inspector when an incident occurs. If a change in staff occurs, operators are provided with contact personnel and telephone numbers to use during and after normal work hours when an incident occurs. The operator is required to go down the list of personnel until a person answers.
- b. Yes, Rick Moses is familiar with the requirements contained in Appendix D & E located in the Guidelines for States Participating in the Pipeline Safety Program

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

Evaluator Notes:

A review of FL PCSC Standard Operating Procedures 1122 and on GS-10 form require the agency to determine if it was not necessary to conduct an investigation and explain why the visit was not conducted. However, a review of three incidents that occurred in CY2016 found one incident was not investigated and GS-10 form not completed. Therefore, a loss of one point occurred and improvement is needed.

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

- |    |   |                                      |                          |   |
|----|---|--------------------------------------|--------------------------|---|
| a. | Observations and document review                        | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Contributing Factors                                    | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Recommendations to prevent recurrences when appropriate | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

Yes, two incidents were thoroughly investigated and contributing factors listed.

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

Evaluator Notes:

No violations were found during the investigation of the incidents in CY2016.

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

Evaluator Notes:

Yes, Program Manager, Rick Moses communicated with Chris Taylor & Michael Schwarzkopf, PHMSA Southern Region office, about the three incidents. No areas of concern.

---

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

Evaluator Notes:

A review of incidents that occurred in FL during the previous year was shared with NAPS SR State Program Managers at the NAPS SR Southern Region Meeting in Biloxi, MS.

---

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

Evaluator Notes:

A loss of one point occurred on Question E.3

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Total points scored for this section: 10  
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, FL PSC inspectors continue check this item during the standard evaluation of the operator. This item is listed on page 4 under 192.614, item number 6 of FL PSC Form GS-3.

- |   |   |   |   |
|---|---|---|---|
| 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 item is reviewed with the operator during the inspection FL PSC Form GS-3, page 4, under section 192.614.

- |   |  |   |   |
|---|--|---|---|
| 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, Program Manager, Rick Moses, has participated in discussions with operators and Sunshine 811, Mark Sweet, about changes in the federal rule on damage prevention. Each inspector is reviewing the operator's one call tickets and action to reduce damages to their underground facilities.

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

FL PSC monitors the number of damages and locate tickets from the operator's annual report. The number and tickets are reviewed with the operator during the pipeline safety inspections. Trends on the number of damages per 1,000 locate request are reviewed on PHMSA Performance Metric website. Additionally, information on damages that occur on gas operator's facilities are reported in the agency's Annual Pipeline Safety Report to the Commissioners.

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

TECO Peoples Gas/Florida City Gas

Name of State Inspector(s) Observed:

Marcelina Alvarez & Moise Degand

Location of Inspection:

Miami, Florida

Date of Inspection:

April 10-13, 2017

Name of PHMSA Representative:

Glynn Blanton & David Appelbaum

### Evaluator Notes:

Two separate field observation inspections were conducted. One inspection was performed at TECO in North Miami and the other was at Florida City Gas in Doral. Both were standard operations and maintenance reviews with a field verification of regulators, gate stations, valves and pipe-to-soil potential readings. The following forms were used by the Inspectors: GS-13 Annual Natural Gas Pipeline Safety Summary, Canal Crossings, GS-04 Corrosion Control Survey, GS-05 Pressure Regulator Station, PHMSA Form 24 DIMP, GS-06 Odorization, GS-14 Valves and GS-15 Excess Flow Valves.

- 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, Mr. Jesus Vega, TECO Peoples Gas Company, Territory Manager was notified on March 20, 2017. The following company personnel were present or were asked questions about the company's records: Ms. Mylene Arza, Division Supervisor & Mr. Martin Knight, Corrosion Technician.

For Florida City Gas, Pamela Carmicheal, Operations Supervisor, was also notified on March 20, 2017. David Peluso, Supervisor of Corrosion Services, and Asiel Rodriguez, Operations Supervisor of the Miami Region Office, provided input on company data and records.

- 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, the following forms were used:GS-13 Annual Natural Gas Pipeline Safety Summary, Canal Crossings, GS-04 Corrosion Control Survey, GS-05 Pressure Regulator Station, PHMSA Form 24 DIMP, GS-06 Odorization, GS-14 Valves and GS-15 Excess Flow Valves.

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

### Evaluator Notes:

Yes, a thoroughly documented inspection was conducted and Marcelina Alvarez was observed writing down notes and cathodic protection reading and pressure relief settings at the inspection sites. She performed a very professional inspection and the operator appreciated her comments about making improvements or changes.

Similar performance observed by Moise Degand during his interaction with Florida City Gas.

- 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, Marcelina Alvarez reviewed TECO equipment at the site and insure the equipment matched the task to be performed.

She checked each individual's OQ credentials during the inspection.

Similar performance observed by Mr. Degand during his interaction with Florida City Gas.

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

Evaluator Notes:

Yes, Ms. Alvarez reviewed TECO's written procedures, corrosion control, annual sectionalizing valves, gate & service test stations and pipeline electrical survey documents. Field inspections were performed on two separate days reviewing gate & regulator stations, pipe-to-soil readings and section/emergency valves.

Similar performance observed by Mr. Degand during his interaction with Florida City Gas. Additionally, Mr. Degand had the opportunity to discuss and evaluate some of Florida City Gas' damage prevention efforts, specific to safe excavation. On Wednesday, April 12th, Mr. Degand observed an excavation occurring absent a one-call ticket at the corner of Doral Blvd. and NW 107th Avenue, Miami. Mr. Degand used this opportunity to educate both the excavator and Florida City Gas crews on the topic of 811 and safe excavation practices.

- |          |   |   |   |
|----------|---|---|---|
| <b>7</b> | 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, Ms. Alvarez has completed fourteen courses at TQ. She has completed the DIMP course and is one of the lead inspectors for Distribution and Transmission Integrity Management Program inspections.

Mr. Degand has been with the FL PSC for less than two years and has completed ten T&Q courses. He demonstrated a strong working knowledge in the areas he was responsible for inspecting.

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

Evaluator Notes:

No, this was a scheduled two week inspection and the exit interview would be the following week. Observed Marcelina Alvarez cited the company for low cathodic protection reading found on the distribution system.

Mr. Degand also has a two-week inspection scheduled with Florida City Gas. He did, however, conduct a partial exit interview (debrief) following the second day of records review. In that debrief, Mr. Degand displayed a good command presence and was articulate with his observations/findings and subsequent compliance expectations.

- |          |   |   |    |
|----------|---|---|----|
| <b>9</b> | 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 interviews for both companies were scheduled the following week.

- |           |   |                          |           |
|-----------|---|--------------------------|-----------|
| <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.<br>Info Only = No Points | Info Only                | Info Only |
|           | a. Abandonment  | <input type="checkbox"/> |           |
|           | b. Abnormal Operations  | <input type="checkbox"/> |           |

c.	Break-Out Tanks	<input type="checkbox"/>
d.	Compressor or Pump Stations	<input type="checkbox"/>
e.	Change in Class Location	<input type="checkbox"/>
f.	Casings	<input 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 checked="" type="checkbox"/>
m.	Line Markers	<input checked="" 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 type="checkbox"/>
t.	Navigable Waterway Crossings	<input type="checkbox"/>
u.	Odorization	<input checked="" type="checkbox"/>
v.	Overpressure Safety Devices	<input checked="" type="checkbox"/>
w.	Plastic Pipe Installation	<input type="checkbox"/>
x.	Public Education	<input type="checkbox"/>
y.	Purging	<input type="checkbox"/>
z.	Prevention of Accidental Ignition	<input type="checkbox"/>
A.	Repairs	<input type="checkbox"/>
B.	Signs	<input type="checkbox"/>
C.	Tapping	<input type="checkbox"/>
D.	Valve Maintenance	<input checked="" type="checkbox"/>
E.	Vault Maintenance	<input type="checkbox"/>
F.	Welding	<input 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:

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

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

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