

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

## 2016 Gas State Program Evaluation

for

MARYLAND PUBLIC SERVICE COMMISSION

### Document Legend

#### PART:

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



# 2016 Gas State Program Evaluation -- CY 2016

Gas

**State Agency:** Maryland

**Agency Status:**

**Date of Visit:** 06/26/2017 - 07/14/2017

**Agency Representative:** John J. Clementson, Assistant Chief Engineer

Kobby Anyinam, Pipeline Safety Engineer

Adesina Jalyeola, Pipeline Safety Engineer

R.K. Amroliwala, Pipeline Safety Engineer

Negussie Tesfaye, Pipeline Safety Engineer

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

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

**Name/Title:** W. Kevin Hughes, Chairman

**Agency:** Maryland Public Service Commission

**Address:** 6 St. Paul Street, 19th Floor

**City/State/Zip:** Baltimore, MD 21202-6806

**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	10
13	13
48	48
15	15
11	11
8	4
12	12
0	0
0	0

### TOTALS

**117 113**

### State Rating

**96.6**

# PART A - Progress Report and Program Documentation Review

Points(MAX) Score

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

Evaluator Notes:

A review of Attachment 1 found one additional LPG operator, Taylor Gas, & one Intrastate Transmission operator, PSEG Keys Energy, were added to the operators under MD PSC jurisdictional authority in CY2016. Additionally, one master meter operator, Marriot Corporation, was removed from the list due to being purchased by a distribution company. A review of Attachment 3 confirmed these changes. It was suggested to the Program Manager to list new or deleted operators in the "note section" of the attachments in future filings.

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

Evaluator Notes:

Reviewed inspection days of each activity in Attachment 2 and found information correct.

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

Evaluator Notes:

Two additional operators were added to the list from the previous filing, Taylor Gas-LPG and PSEG Keys Energy-Intrastate Transmission. One master meter operator, Marriot Corporation, was removed due to being purchased by a distribution company. No issues and information was correct.

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

Evaluator Notes:

One incident occurred in CY2016 on Washington Gas Light Company facility. The incident at 8701 Arliss Street in Silver Springs, MD is still under investigation by NTSB and MD PSC. No issues with Attachment 4.

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

Evaluator Notes:

Reviewed compliance activities and found information matched records in office and files. The number of carryovers, 47, to be corrected was less than previous year, 92. No areas of concern.

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

Evaluator Notes:

Yes. Files and records located in office were well-organized and accessible.

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

Evaluator Notes:

A review of Attachment 7 and TQ records indicate all inspectors except Negussie Tesfaye and Kobby Anyinam have completed training to meet the Gas Inspector requirements. Additionally, Rick Miller has not completed PL1297 course to meet the requirements for Gas IM inspector training and was listed in last year's program evaluation. Program Manager has scheduled to have Rick Miller attend the course in August, 2017.

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:

MD PSC has automatic adoption of federal rules and regulations. MD PSC civil penalty amounts are the same as PHMSA. Civil penalties for damage prevention is listed in Maryland Public Utilities Articles and Related Laws, Title 12 Underground Facilities: 12-135. No issues.

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

Evaluator Notes:

Planned and past program performance were listed along with DPAP information. No issues with Attachment 10.

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

Evaluator Notes:

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

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



## PART B - Program Inspection Procedures

Points(MAX)    Score

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

Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

Improvement was noted in a rewrite of MD PSC written procedures for pipeline safety. In this regard, standard inspection procedures for pre-inspection, inspection and post-inspection are listed under V. Conducting Inspections, Section E, Record Inspection, page 11.

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

Improvement was noted in a rewrite of MD PSC written procedures for pipeline safety. In this regard, IMP & DIMP inspection procedures for pre-inspection, inspection and post-inspection are listed under V. Conducting Inspections, Section O, Distribution Integrity Management Programs , page 17.

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

Improvement was noted in a rewrite of MD PSC written procedures for pipeline safety. OQ inspection procedures for pre-inspection, inspection and post-inspection are listed under V. Conducting Inspections, H. Training and Operator Qualification (OQ) Inspections, page 16.

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

Improvement was noted in a rewrite of MD PSC written procedures for pipeline safety. Damage Prevention procedures for pre-inspection, inspection and post-inspection are listed under V. Conducting Inspections, L. Damage Prevention Activities, page 16.

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

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

Yes, this item is listed under V. Conducting Inspections, Section K. Operator Training on page 16.

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

Improvement was noted in a rewrite of MD PSC written procedures for pipeline safety. Construction inspection procedures for pre-inspection, inspection and post-inspection are listed under V. Conducting Inspections, Section G. Design, Testing and Construction Inspection, page 13.

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

Improvement was noted in a rewrite of MD PSC written procedures for pipeline safety. Inspection Priorities are listed under IV. Inspection Planning, Section B. Inspection Priority, pages 8-9. A review of office records and files indicate all inspections units are broken down correctly. The number of inspection units has increased from previous year due to a new LPG operator, Taylor Gas and Intrastate Transmission Company, PSEF Keys Energy.

8 General Comments:

Info Only = No Points

Info OnlyInfo Only

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):  
524.25

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
 $220 \times 5.46 = 1201.57$

Ratio: A / B  
 $524.25 / 1201.57 = 0.44$

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)= 524.25

B.Total Inspection Person Days Charged to the program( $220 \times$ Number of Inspection person years(Attachment 7)  
=1201.56652

Formula:- Ratio = A/B =  $524.25/1201.56652 = 0.44$

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

Thus Points = 5

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

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

### Evaluator Notes:

Yes, a review of TQ transcript data confirm the following: All inspectors including the two recently hired have completed the OQ training before conducting an inspection as a lead. Three inspectors, Rick Miller, Negussie Tesfaye & Kobby Anyinam, have not completed the IMP training but the remaining inspectors have met the training requirements. John Clementson, Carlos Acosta, R.K. Amroliwala & Adesina Jaiyeola have completed the Root Cause training. Yes, Adesina Jaiyeola attended the Appalachian Underground Corrosion Short Course and Rick Miller, RK Amroliwala & Carlos Acosta attended the Greater Chesapeake Damage Prevention Training course. All but two inspectors, Kobby Anyinam & Negussie Tesfaye, are qualified to perform and lead a standard inspection.

- 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, John Clementson has completed all training courses for Gas & Hazardous Liquid Inspector training requirements and has over twenty years experience in pipeline safety inspection work.

- 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:

John Clementson requested an extension of time be granted to submit the Chairman's response letter on August 26, 2016 due to the Silver Springs Maryland accident. Zach Barrett granted the extension till September 5, 2016.

Chairman Hughes' response letter was received on August 31, 2016 and within the required extension date.

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

Evaluator Notes:

Yes, MD PSC and TQ staff conducted a pipeline safety training seminar in April, 2016 at Linthicum Heights, MD. The three days seminar was attended by operators from distribution, master meter and LPG systems. Total number of attendees from LDC was 88 and Master Meter 25.

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

Evaluator Notes:

Yes, conducted a review of files and inspection reports and found all operator types and inspection units were inspected in accordance to written procedures. Program Manager has developed a tracking system to monitor all inspections performed by inspectors and due date when the inspection is to be performed on the time interval schedule.

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

Evaluator Notes:

Yes, they continue to use the Federal and State forms in performing inspections of operators under their jurisdictional authority.

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

Evaluator Notes:

Yes, they continue to use MD PSC Form EN # 17, Gas Utility O&M Plan Comp Review, to monitor this item.

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

Evaluator Notes:

Yes, this item is address in MD PSC Form EN # 17, Gas Utility O&M Plan Comp Review.

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

Evaluator Notes:

Yes, Form EN # 17, Gas Utility O&M Plan Comp Review, is used to monitor this requirement. No issues.

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

Evaluator Notes:

Yes, MD PSC is using Form 54, Failure Investigation, to review and monitor this item.

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

Evaluator Notes:

Yes, operator's annual reports are reviewed by Program Manager and data entered into a spreadsheet. The data is reviewed for trends in the number of services, mains and leakage. Inspector's also review the reports with the operators during the inspection audits.

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

Evaluator Notes:

Yes, MD PSC is using IA program to meet this requirement.

- 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 is being accomplished in a separate letter from the Program Manager to the intrastate transmission company representative requesting a copy of the email from NPMS confirming any changes or updates. A review of files confirm this is being performed. No issues.

- 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, they use MD PSC Form EN # 10, Drug & Alcohol, to verify the operator is conducting drug and alcohol tests.

- 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 is being accomplished by all inspectors using the Federal Program IA.

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

Evaluator Notes:

Yes, MD PSC uses the Federal Program IA to verify this information.

- 18 Is state verifying operator's gas distribution integrity management Programs (DIMP)? This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). (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 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, MD PSC uses the Federal Program IA to verify this information.

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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 |
|-----------|--|---|---|
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Evaluator Notes:

Yes, MD PSC uses the Federal Program IA to verify this information.

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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 |
|-----------|--|---|---|
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Evaluator Notes:

Yes, MD PSC staff members continue to meet with operators on a quarterly schedule at the Gas Operator Advisory Committee meetings to discuss issues pertaining to damage prevention or enforcement action for non-compliance.

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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 | NA |
|-----------|---|---|----|
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Evaluator Notes:

No safety related condition reports in CY2016.

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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 reviewed and discussed with the operators at the Gas Operator Advisory Committee meetings that are held in March, June, October and December each year.

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

Yes, John Clementson responded to sixteen NAPSR monkey surveys in CY 2016. This was confirmed by reviewing emails to Robert Clarillos, NAPSR Administrative Manager.

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

Evaluator Notes:

No waivers/special permits have been issued in CY2016. Program Manager contacted John Gale in CY2016 and was successful in removing five of the eight waivers listed on PHMSA website. The remaining three waivers will continue to be reviewed by Program Manager to determine if the waivers are still active.

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

Evaluator Notes:

John Clementson, Program Manager, was unable to attend the 2016 NAPSR Board of Directors Meeting in Indianapolis, IN. However, with the approval of Zach Barrett, PHMSA Director State Programs, he allowed Carlos Acosta, MD PSC Pipeline Safety Engineer, to attend in John's absence.

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

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

Evaluator Notes:

Reviewed requested data from operators on leaks and cause of leaks referred to in Chairman's response letter dated August 31, 2016. MD PSC is tracking leaks and causes for both services and mains over a three-year period. Results show overall leaks for mains were trending downward and services upward. The upward trend on service lines is due to equipment failure. MD PSC will continue to monitoring these trends during their review of the operator's annual reports and field inspections.

CGA recently released information on CY2016 Gas Distribution Damages Per State. The results show Maryland has the lowest damages rate of 1.11 in the Nation. The highest damage rate was Hawaii at 20.01.

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

Evaluator Notes:

Reviewed the SIDCT with John Clementson and found the results closely reflected the actual inspection days being performed. No anticipated changes are proposed in CY2017 review of the SDCT for MD PSC.

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

Evaluator Notes:

Reviewed the Advisory Bulletin Notice with John Clementson. This item will be included and discussed with the Liquid and Gas Transmission operators in future inspection audits.

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

Evaluator Notes:

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

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Total points scored for this section: 48  
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. Yes, this is listed in Section V. CONDUCTING INSPECTIONS, Subsection P. Notice of Probable Violations (NOPV) and/or Warning Letters (WARN) of MD PSC INSPECTION, ENFORCEMENT AND INCIDENT INVESTIGATION PROCEDURES, page 17.
- b. Yes, same location as listed above.
- c. Yes, this information is described in Subsection R. Notice of Probable Violation Tracking.

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

### Evaluator Notes:

Yes, reviewed office spreadsheet and found eight NOPV and twenty-eight warning letters were sent to company officers in CY2016. Randomly selected NOPV and Warning letters and reviewed content and information pertaining to the violations. All letters contained civil penalty amounts or action the operator could take to correct the violation(s) or request a meeting to resolve the violation(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, twenty-eight compliance actions were taken in CY2016 against operators for non-compliance with the regulations.

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

### Evaluator Notes:

Yes, compliance action was provided in the letters.

- |          |   |   |   |
|----------|---|---|---|
| <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, Program Manager is familiar with imposing civil penalties, In CY2016 two civil penalties were assessed against Baltimore Gas & Electric in the amount of \$25,000, one penalty against Glen Manor Apts. for \$500 and one penalty against Deep Creek Mountain Utilities for \$500. The penalty amount for Glen Manor Apts. was paid on 3/31/17.

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

Evaluator Notes:

Yes, the civil penalties assessed and collected in CY2016 clearly demonstrates the agency's enforcement action.

---

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

Evaluator Notes:

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

---

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



## PART E - Incident Investigations

Points(MAX) Score

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

Evaluator Notes:

Yes, this is listed in MD PSC written procedures, Section VI. Investigation of Incidents, page 20.

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

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

Evaluator Notes:

Yes, Program Manager and Pipeline Safety Engineers are familiar with the MOU's between NTSB and PHMSA. The accident that occurred in Silver Springs, MD in CY2016 clearly demonstrates the awareness of these items between MD PSC and the federal agencies.

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

Evaluator Notes:

Yes, this is listed in MD PSC written procedures, Section VI. Investigation of Incidents, page 22.

- 4 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? 3 3  
Yes = 3 No = 0 Needs Improvement = 1-2
- a. Observations and document review Yes ☒ No ☐ Needs Improvement ☐  
b. Contributing Factors Yes ☒ No ☐ Needs Improvement ☐  
c. Recommendations to prevent recurrences when appropriate Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

Yes, a review of files found one incident that occurred on Washington Gas Light Company facilities located at 8701 Arliss Street in Silver Springs, MD on 08/11/2016 was still under investigation by MD PSC and NTSB.

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

Evaluator Notes:

The incident is under investigation by NTSB and the results could affect compliance action by NTSB or MD PSC.

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

Evaluator Notes:

Yes, follow up information was provided to NTSB and PHMSA Eastern Region on the incident.

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

Yes = 1 No = 0

Evaluator Notes:

Yes, information about the Silver Springs, MD incident will be presented at the NAPSR Eastern Region meeting.

---

**8** General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

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

---

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



## PART F - Damage Prevention

Points(MAX) Score

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

Evaluator Notes:

A review of inspection reports and files determined this item could not be documented that it was covered with the operator during the inspection audits. Therefore, a loss of two points occurred.

- |   |   |   |   |
|---|---|---|---|
| 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 and question is listed on the MD PSC construction activity form. The inspector is required to check and verify the locate request ticket number.

- |   |  |   |   |
|---|--|---|---|
| 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 | 0 |
|---|--|---|---|

Evaluator Notes:

No, verification that this item was discussed at the damage prevention committee meetings via an agenda could not be confirmed. Therefore, improvement is needed and a loss of two points occurred.

- |   |  |   |   |
|---|--|---|---|
| 4 | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests? (This can include DIRT and other data shared and reviewed by the pipeline safety program)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, MD PSC collects data and evaluate trends on the number of damages and presents the results to operators at the quarterly Gas Operator Advisory Committee meetings. This information was verified by reviewing the reports presented.

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

Evaluator Notes:

A loss of four points occurred in this section of the review.

Total points scored for this section: 4  
Total possible points for this section: 8



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

Name of Operator Inspected:

Baltimore Gas Electric & Washington Gas Company

Name of State Inspector(s) Observed:

Kobby Anyinam, AJ Jalyeola, R.K. Amroliwala, Negussie Tesfaye & John Clementson

Location of Inspection:

Baltimore, MD

Date of Inspection:

July 10-12, 2017

Name of PHMSA Representative:

Glynn Blanton, PHMSA State Programs

Evaluator Notes:

Two construction inspections were performed on July 10, 2017 at the following locations.

Pasture Brook Road and New Cut Road. This was a gas main relocation project to allow room for a new sewer drainage line to be installed in the future. BGE contractor was Precision Pipeline Solutions who was performing the work. Paul Johnson was crew foreman. Kobby Anyinam reviewed plans, OQ records, Miss Utility locate ticket, and calibration of CGI equipment. Material installed was Driscop 8", 8100, date of pipe was 14 February 2017. No issues or violations found.

The second construction site was a renewed service line being installed at Waveland Road. Contractor was T&D Services East. The 3/4 service line was Driscop 8100 and date of pipe was 01-31-17. Miss Utility located ticket was checked and verified, OQ records reviewed. No violations or issues with construction work or personnel.

On July 11th observed two construction projects being performed by Washington Gas Company personnel. Matt Stallard, Washington Gas Company Compliance Auditor, was at the construction site to oversee the projects. A new 3/4-inch service line was installed at 6746 McCormick Drive in the Marshall Grove Subdivision. Verification of Miss Utility locate ticket, operator qualification, construction plans and material being installed was checked by AJ Jaiyeola. Test pressure was 90 psig and material was dated February 3, 2017. The second project was a new two inch main being installed at Whittle Court and Curtin Road by Washington Gas Company construction crew in the Ryan Homes subdivision lot 47. All records pertaining to operator qualifications were inspected. Miss Utility locate ticket was found current and PE pipe material being installed was dated November 11, 2016. No violations were found.

On July 12th observed installation of an 8-inch main line relocation project along Hwy 97 & 28 in Norbeck, MD. Working was being performed by Washington Gas Company personnel. John Augustus, Project Supervisor and Jeff Sirk, General Foreman provided information and details of the project. MD PSC Inspectors, R.K. Amroliwala and Negussie Tesfaye conducted the construction inspection. Observed each inspector checking Washington Gas Company's written procedures, operator qualification records, Miss Utility locate ticket, fusion procedures and depth of pipe installation. No violations were found. Inspectors were using the EN34 form and all information on the form was completed during the inspection.

- 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, Baltimore Gas Electric and Washington Gas Company were notified prior to the inspection by John Clementson or one of the MD PSC inspectors.

- 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, each inspector was observed using the correct form, EN 34, for the inspection being performed.

- 4 Did the inspector thoroughly document results of the inspection? 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. Observed each inspector thoroughly documenting the results of their review of the operator's records on operator qualification, location tickets & company written procedures.

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

Evaluator Notes:

Yes, each inspector checked the type of work being performed and reviewed the equipment used at the construction site.

- |          |  |                                     |   |
|----------|--|-------------------------------------|---|
| <b>6</b> | 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  | <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, records, equipment and company procedures were review and checked. Additionally, Miss Utility locate tickets and marking of facilities were reviewed. Noted all inspectors were very thorough in their review of each of these items.

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

Evaluator Notes:

Yes, each inspectors demonstrated an adequate knowledge and experience in pipeline safety regulations. All inspectors except Kobby Anyinam and Negussie Tesfaye have completed all Gas Inspector Training. Kobby and Negussie are schedule to complete their training at the end of 2017.

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

Evaluator Notes:

Yes, an exit interview was performed by each inspector with the crew foreman at the end of the day or prior to leaving the site.

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

Evaluator Notes:

No violations were noted or found.

- |           |  |                          |           |
|-----------|--|--------------------------|-----------|
| <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                | Info Only |
|           | Info Only = No Points  |                          |           |
|           | 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 checked="" type="checkbox"/>
q.	MAOP	<input checked="" 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 checked="" 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 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 type="checkbox"/>
J.	Other	<input type="checkbox"/>

Evaluator Notes:

Excellent construction inspections were conducted by MD PSC Engineers. They asked a lot of questions from the operator's on the construction project, material being installed, and operator qualification documentation.

---

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



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

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

Evaluator Notes:

N/A

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

N/A

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

N/A

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

N/A

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

N/A

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

N/A

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

N/A

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

Evaluator Notes:

N/A

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:

N/A

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

N/A

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

N/A

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

N/A

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

N/A

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

N/A

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

Evaluator Notes:

N/A

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