

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

## 2016 Gas State Program Evaluation

for

MISSOURI 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:** Missouri

**Agency Status:**

**Date of Visit:** 04/12/2017 - 08/25/2017

**Agency Representative:** Kathleen McNelis

**PHMSA Representative:** Clint Stephens

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

**Name/Title:** Mr. Daniel Y. Hall, Chairman

**Agency:** Missouri Public Service Commission

**Address:** 200 Madison Street, Suite 900

**City/State/Zip:** Jefferson City, Missouri 65101

**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

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

### Possible Points Points Scored

10	10
13	13
49	49
15	13
11	11
8	8
11	11
0	0
0	0

### TOTALS

117 115

### State Rating

98.3

## 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:

No issues with accuracy of data.

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

Evaluator Notes:

Review of inspector days spreadsheets for each inspectors, numbers seem accurate in Attachment 2 of Progress Report.

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

No issues with accuracy of data.

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

Incidents in Attachment 4 of Progress Report match information in the PDM.

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

Evaluator Notes:

No issues with accuracy of Attachment 5 in Progress Report.

- |   |   |   |   |
|---|---|---|---|
| 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. Inspection files are stored in paper form and electronically.

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

No issues with information in Attachment 7 of Progress Report.

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

Evaluator Notes:

No issues with information in Attachment 8 of Progress Report.

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

Evaluator Notes:

MoPSC did not mention the accelerated main replacement program in Attachment 10 for unprotected and cast iron pipe. There are two operators with in the State that have cast iron pipe, LaClede Gas Company and Missouri Gas Energy Co. (MGE). There was a total of 53 miles of cast iron pipe replaced in the 2016 fiscal year with a total of 876 miles of cast iron remaining.

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**10** General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

No issues were identified in Part A of evaluation of State Program.

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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:

1. Section 5 of the Missouri Pipeline Safety Program Plan addresses pre-inspection, inspection and post inspection activities.
2. Section 5.2 (Pre-Inspection Activities) includes general information and a list of specific documents to be reviewed by inspection type, including Standard Inspections.
3. Section 5.5 (General On-Site Inspection Guidelines) includes the general procedures for conducting inspections and specific information for Standard Inspection in Section 5.5.2.
4. Section 5.6 addresses Post-inspection activities.
5. Appendix E contains a copy of the Standard Inspection checklist
6. Appendix F contains copies of the field forms

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

1. Section 5 of the Missouri Pipeline Safety Program Plan addresses pre-inspection, inspection and post inspection activities.
2. Section 5.2 (Pre-Inspection Activities) includes general information and a list of specific documents to be reviewed by inspection type, including transmission and distribution integrity management Inspections.
3. Section 5.5 (General On-Site Inspection Guidelines) includes the general procedures for conducting inspections and specific information for DIMP Inspections (Section 5.5.6) and Transmission IMP (Section 5.5.7).
4. Section 5.6 addresses Post-inspection activities.
5. Checklists are included in Appendix E of the 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:

1. Section 5 of the Missouri Pipeline Safety Program Plan addresses pre-inspection, inspection and post inspection activities.
2. Section 5.2 (Pre-Inspection Activities) includes general information and a list of specific documents to be reviewed by inspection type, including OQ Inspections.
3. Section 5.5 (General On-Site Inspection Guidelines) includes the general procedures for conducting inspections and specific information for OQ Inspection in Section 5.5.5.
4. Section 5.6 addresses Post-inspection activities.
5. Checklists are included in Appendix E.

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

1. Damage Prevention is specifically addressed in Section 9 of the Missouri Pipeline Safety Program Plan.
2. Per Section 9.2, compliance inspections are conducted as part of standard inspections.
3. Section 5 of the Missouri Pipeline Safety Program Plan addresses pre-inspection, inspection and post inspection activities.

4. Section 5.2 (Pre-Inspection Activities) includes general information and a list of specific documents to be reviewed by inspection type, including Standard Inspections.
5. Section 5.5 (General On-Site Inspection Guidelines) includes the general procedures for conducting inspections and specific information for Standard Inspections in Section 5.5.2. Damage prevention is checked as part of Standard Inspections.
6. Section 5.6 addresses Post-inspection activities.

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**5** Any operator training conducted should be outlined and appropriately documented as needed. 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Procedure is included in Section 5.5.14 of the Missouri Pipeline Safety Program Plan.

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**6** Construction Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

1. Section 5 of the Missouri Pipeline Safety Program Plan addresses pre-inspection, inspection and post inspection activities.
  2. Section 5.2 (Pre-Inspection Activities) includes general information and a list of specific documents to be reviewed by inspection type, including Construction Inspections.
  3. Section 5.5 (General On-Site Inspection Guidelines) includes the general procedures for conducting inspections and specific information for Construction Inspections in Section 5.5.12.
  4. Section 5.6 addresses Post-inspection activities.
- 

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

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

Evaluator Notes:

Procedure is outlined in Section 4.2 of Plan. No issues.

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

Evaluator Notes:

No issues were identified in Part B of evaluation of State Program.

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Total points scored for this section: 13  
Total possible points for this section: 13

## PART C - Program Performance

Points(MAX) Score

- 1 Was ratio of Total Inspection person-days to total person days acceptable? (Director of State Programs may modify with just cause) Chapter 4.3 5 5  
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):  
645.60

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
220 X 7.43 = 1635.33

Ratio: A / B  
645.60 / 1635.33 = 0.39

If Ratio  $\geq$  0.38 Then Points = 5, If Ratio  $<$  0.38 Then Points = 0  
Points = 5

### Evaluator Notes:

MoPSC ratio total inspection person days to total person days is  $645.6/220 \times 7.43 = .39$ . This meets the required ratio of  $\geq .38$ .

- 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:

T&Q training records seem to indicate inspectors and program managers have met necessary training requirements. Kathleen McNelis and John Kottwitz are only personnel qualified to perform IMP inspections. Three inspectors are on waiting list to take IMP Course.

- 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:

Program Manager seems to have adequate knowledge of PHMSA program and regulations.

- 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:

Chairman letter sent August 18, 2016, response received on September 29, 2016. Letter responded to all 16 issues listed.

- 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:

The MoPSC participated in the MANGO Natural Gas Operations Seminar June 29 thru July 1, 2016 at Lake of the Ozarks. This seminar is held on an annual basis.

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

All operators and inspection units have been inspected in accordance with time intervals, along with all master meters.

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

Recommended that MoPSC add comments to inspection checklist questions for those selected as N/A or N/C. There were inspection checklists that had no comments when N/A and/or N/C was selected.

The MoPSC need to revise D&A checklist to include selection criteria for each question, such as, S,U,N/A, N/C or Yes/No.

- |   |   |   |   |
|---|---|---|---|
| 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. This issue is addressed in the standard records and field checklist under corrosion control 4 CSR 240-40.030 (9)(F), (9)(U)1 & (9)(U)2, and in the O&M and Emergency Procedures Inspection Checklist under (9)(F) and (9)(U).

- |   |  |   |   |
|---|--|---|---|
| 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 is a question in the O&M and Emergency Procedures Checklist 4 CSR 240-40.030 Section (12) (H) ? Continuing Surveillance.

- |    |   |   |   |
|----|---|---|---|
| 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. This is a question in the O&M and Emergency Procedures Checklist 4 CSR 240-40.030 Section (12) (J).

- |    |  |   |   |
|----|--|---|---|
| 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. This is a question in the O&M and Emergency Procedures Checklist 4 CSR 240-40.030 Section (12) (L) - Failure Investigation Procedures. MoPSC also follows up on this for reportable incidents including third party damages. Leak response requirements are spelled out in 4 CSR 240-40.030(14) and records are inspected during standard inspections.

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

Evaluator Notes:



Yes. MoPSC completed a checklists suggested by PHMSA in 2017 for review of the 2016 PHMSA annual reports. Additionally, Missouri had performed a detailed analysis for trends using PHMSA annual report and mechanical fitting failure data and discussed these trends with operators during DIMP and TIMP inspections.

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

There were 10 OQ field inspections, 17 OQ program inspections uploaded into database in 2016. Nine IM inspections uploaded into the IMDB in 2016.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>14</b> | Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission?<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|
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Evaluator Notes:

The MoPSC by separate correspondence with transmission operators verifies whether they have any changes in pipeline mileage and their responses were filed and documented.

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

Yes. This is done during standard inspections and documented in the checklist.

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

Evaluator Notes:

Yes. MoPSC requested updated OQ plans from all operators in a July 20, 2016, "All Operators Letter". Comprehensive PHMSA OQ protocol inspections of all programs are underway and results have been uploaded to PHMSA's OQDB as they are completed. 17 OQ program inspections were uploaded into database in 2016.

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

Yes. MoPSC has reviewed all operators IMP Plans and have conducted PHMSA IMP Protocol inspections. Some operators are still in the process of revising plans and programs. Nine IM inspections uploaded into the IMDB in 2016.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>18</b> | Is state verifying operator's gas distribution integrity management Programs (DIMP)? This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). (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 |
|-----------|---|---|---|
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Evaluator Notes:

Yes. In an October 20, 2016 a letter was sent to all operators, the MoPSC requested updated DIMP Plans since the maximum interval (NTE 5 years) for program re-evaluation occurred in 2016. MoPSC has been conducting DIMP inspections with

operators including program review and updates of the operator's plans. Five DIMP inspections uploaded in to DIMP database in 2016.

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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. MoPSC checks for compliance with public awareness requirements as part of standard inspections. Results are documented in Standard Checklists section 4 CSR 240-40.030 (12) (K). MoPSC has also been conducting public awareness program effectiveness inspections and verifying that each operator has performed effectiveness evaluations. There were 28 PAPEI inspections uploaded in the database for 2016.

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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. Through the "all operators" letters which are sent out as needed (e.g. to advise of rule changes, advisory bulletins, etc.), and during the spring and fall MANGO meetings, and on MoPSC 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:

LaClede Gas Co. had one SRCR filed in May 2016, which was closed in September 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. One operator is in a replacement program for Aldyl A pipe, and the MoPSC Safety Staff tracks progress of this through reports from the operator. MoPSC files annual updates with the Commission in case number GS-2004-0257. More recently, MoPSC has been addressing this issue with individual operators through DIMP inspections.

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

Evaluator Notes:

Yes. The MoPSC has participated in/responded to surveys or information requests from NAPS or PHMSA.

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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:

Yes. Per PHMSA's recommendation during CY2015 evaluation, MoPSC has added a listing of operators having plastic joining waiver to their standard inspection checklist. This list is also included in Appendix E of MoPSC Operations Procedures.

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|-----------|--|---|---|
| <b>25</b> | 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. Program Manager attended the 2016 Annual Board of Directors Meeting & National Meeting in Indianapolis (September 26-30, 2016) and the 2016 NAPSR Central Region Meeting in Omaha (June 6-10, 2016).

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- |           |   |                                      |  |
|-----------|---|--------------------------------------|--|
| <b>26</b> | Discussion on State Program Performance Metrics found on Stakeholder Communication site - <a href="http://primis.phmsa.dot.gov/comm/states.htm">http://primis.phmsa.dot.gov/comm/states.htm</a><br>No = 0 Needs Improvement = 1 Yes = 2 | 2                                    | 2  |
| a.        | Discussion of Potential Accelerated Actions (AA's) based on any negative trends   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b.        | NTSB P-11-20 Meaningful Metrics   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

Inspection Activity metrics indicates inspection time with each operator has decreased continuously from 2012 to 2015. The inspection activity is based on number of inspection days per combined miles of distribution, gathering, and transmission lines. MoPSC indicated the primary cause of the decrease is that gas safety Staff had not been performing a sufficient number of inspections. A number of staff members were assigned to incident investigations and some to complaint cases over the past 3 years. Additionally, there was a lot of employee turnover since 2012, require hiring new inspectors and time spent training these inspectors. The MoPSC is working hard to reverse this trend and to catch up on the numerous inspections that they are behind on.

Enforcement metrics indicates the State's regulatory enforcement program based on annual evaluation declined considerably from 2013 to 2014, 100% to 80%. The MoPSC stated this was due to not meeting inspection day requirements and not performing inspections that were due. Actions have been implemented to reverse this trend in 2016. In 2016, two new inspectors each had 6 training courses in T&Q. This will provide more qualified staff to perform inspections.

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

Evaluator Notes:

- ? Attachment 2 of Progress Report indicates 646 person days/yr. for CY2016; whereas, SICT was calculated for 425 person days for CY2017.
- ? SICT spreadsheet indicates not many person days allocated for TIMP/DIMP inspections.
- ? Not many days allocated to compliance follow-ups.

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

Evaluator Notes:

MoPSC was not aware of any pipeline flow reversals or product changes. There have been instances of conversions of propane service and yard lines to natural gas service. These items are addressed for compliance with Missouri limitations on such conversions in 4 CSR 240-40.030(1)(H)3.

Recommended to MoPSC to add question to Standard Inspection checklist.

- 
- |           |  |           |           |
|-----------|--|-----------|-----------|
| <b>29</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

Evaluator Notes:

No issues were identified in Part C of evaluation of State Program.

---

Total points scored for this section: 49  
Total possible points for this section: 49

## PART D - Compliance Activities

Points(MAX) Score

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

### Evaluator Notes:

Procedure to notify company officer contained in section 2.5.5 of MoPSC Operations Procedures; procedure 5.6.1, item #5 contains process for reviewing progress of compliance actions; and procedure 5.6.2, 5.6.3, 5.6.4 contain process regarding closing outstanding probable violations.

- |          |  |   |  |
|----------|--|---|--|
| <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   | 3  |
| 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 type="radio"/> No <input type="radio"/>            | Needs Improvement <input checked="" 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:

The MoPSC is not documenting all probable violations based on information recorded in its inspection checklists. A master meter was inspected in September 2016 and found to not have a leak survey performed, and the MoPSC did not document it as a probable violation, but as an "area of concern". The inspection report was closed out based on all violations being corrected, but leak survey had not been monitored for completion because it was not written up as a probable violation.

A construction inspection indicated in the inspection checklist that the construction contractor had no construction specifications (procedures) for the project, but there was no violation written up for this non-compliance issue.

Another construction inspection indicated in the inspection checklist that there were numerous "Unsatisfactory" selected, but these items were not written up as probable violations or areas of concern. The MoPSC Staff needs to be trained on verifying the inspection checklist is used as a guide for the inspection process and for preparing the final inspection report.

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

Review of some of the inspection reports indicated that compliance actions were issued for all probable 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:

Yes. No issues.

- |          |   |   |   |
|----------|---|---|---|
| <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) | 2 | 2 |
|----------|---|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, Program Manager is familiar with process for imposing civil penalties. There were no repeat violations to consider for civil penalties.

---

**6** Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations? 1 0

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

State cannot demonstrate it is using their enforcement fining authority.

---

**7** General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

There two issues identified in Part D of the evaluation of the program: 1) the MoPSC is not documenting all probable violations based on information recorded in its inspection checklists; and 2) the MoPSC is not using its enforcement fining authority for pipeline safety violations.

---

Total points scored for this section: 13  
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. Procedure is included in section 6 of the MoPSC Procedure Manual. Section 6.1.3 of the procedure manual was revised in April 2017 to provide the change in accident reporting procedures to PHMSA Accident Investigation Division (AID).

- 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. Procedure is included in Section 6 of the MoPSC Procedures Manual which addresses after hour reporting and communications between MoPSC, PHMSA and NTSB. Sections 6.2 and 6.3 provide procedures for reports and recordkeeping.

- 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. The MoPSC did obtain sufficient information from the operator to support decision to not go on-site during two reportable incidents in 2016.

- 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:

There were two reportable incidents in 2016, where one report has been closed as of January 2017; and the other report is still open due to the operator replacing a segment of cast iron pipe with steel by mid-September 2017.

- 5 Did the state initiate compliance action for violations found during any incident/accident investigation? 1 1

Yes = 1 No = 0

Evaluator Notes:

There was a compliance action filed against the operator for mis-locating their pipeline which was hit during excavation by a water company contractor. The compliance action was resolved by January 2017.

- 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. The MoPSC has followed up on all comments and questions sent to them by the PHMSA regional office. They have also responded to questions from Accident Investigation Division (AID).

---

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

Evaluator Notes:

Yes. After investigations have been completed and a report has been reviewed for confidential information, incident investigation reports are filed in the MoPSC Electronic Filing and Information System (EFIS). This information is then available to the public. MoPSC program manager also provides information at NAPSAR Regional meetings.

---

8 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

No issues were identified in Part E of evaluation of State Program.

---

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



## PART F - Damage Prevention

Points(MAX) Score

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

Evaluator Notes:

Included in O&M Inspection Checklist, directly below 4 CSR 240-40.030 Section (12) (I).

- |   |   |   |   |
|---|---|---|---|
| 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. Included in Standard Inspection checklist, 4 CSR 240-40.030 Section (12) (I).  
Recommend revise language on checklist to match this question.

- |   |  |   |   |
|---|--|---|---|
| 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. In addition to attending Missouri CGA meetings, MoPSC Staff participate as volunteers for damage prevention events, including an event in April for Safe Digging Month at the Capitol and the Missouri CGA Damage Prevention and Excavation Summit that is held annually in December.

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

The MoPSC has prepared a graph that analyzes the excavation damage/1,000 tickets trend which indicates a steady decrease from 2011 to 2016.

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

Evaluator Notes:

No issues were identified in Part F of evaluation of State Program.

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



## PART G - Field Inspections

Points(MAX) Score

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

Name of Operator Inspected:

Summit Natural Gas, 272 Industrial Park, Camdenton, MO

Name of State Inspector(s) Observed:

Daniel Fitzpatrick, Lead Inspector, Clinton Foster, Kathleen McNelis, Program Manager

Location of Inspection:

272 Industrial Park, Camdenton, MO

Date of Inspection:

4/10/2017 to 4/11/2017

Name of PHMSA Representative:

Don Martin

Evaluator Notes:

The MOPSC conducted a DIMP Plan Inspection. The inspection of the operator's DIMP Plan was conducted previously; however, due to ownership/operator change this is the initial review of the new operator's plan which superseded all other plans.

- 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, the Operator's representative, David Morgan, was notified by email on January 17, 2017.

- 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:

The MOPSC inspectors used the Inspection Form downloaded from the DIMP Database. Questions 1 through 54 were used during the inspection. The inspection form guided the lead inspector through the inspection. The lead inspector documented the results on the electronic version of the form. Notes were also taken by the other MOPSC inspectors.

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

Evaluator Notes:

Yes, the Lead Inspector entered the results into the electronic version of the DIMP Database form as he stepped through the questions.

- 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 NA  
Yes = 1 No = 0

Evaluator Notes:

NA. The MOPSC conducted a DIMP Plan inspection. Equipment was not needed for the operator to show evidence of compliance.

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

a. Procedures ☒

b. Records ☒

c. Field Activities ☐

d. Other (please comment) ☐

Evaluator Notes:

The MOPSC conducted a DIMP Plan Inspection. To complete this inspection type the MOPSC had to constantly refer to the operator's DIMP Plan. Certain records were reviewed.

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

Evaluator Notes:

Daniel Fitzpatrick has 13 years of experience inspecting pipeline operators. Daniel has completed all of the required training related to the inspections types he conducts. There were no issues with Daniels knowledge of the safety regulations and the pipeline safety program.

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

Evaluator Notes:

Yes, upon completion of the question set contained in the inspection form, the lead inspector provided a verbal summary of the identified changes needed in the Plan. Each needed change was discussed and explained.

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

Evaluator Notes:

The inspector provided a list of items that need to be incorporated into the operator's DIMP Plan. Upon an initial review it appeared that most items are applicable for a notice of amendment. The MOPSC will convene after the site visit to determine if any of the items are considered non-compliant. If items are deemed to be non-compliant it will be stated in the written correspondence following the inspection.

- |    |  |           |           |
|----|--|-----------|-----------|
| 10 | General Comments: 1) What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) 2) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) 3) Other. | Info Only | Info Only |
|----|--|-----------|-----------|

Info Only = No Points

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



- |    |                                   |                          |
|----|-----------------------------------|--------------------------|
| x. | Public Education                  | <input type="checkbox"/> |
| y. | Purging                           | <input type="checkbox"/> |
| z. | Prevention of Accidental Ignition | <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 type="checkbox"/> |
| H. | Compliance Follow-up              | <input type="checkbox"/> |
| I. | Atmospheric Corrosion             | <input type="checkbox"/> |
| J. | Other                             | <input type="checkbox"/> |

Evaluator Notes:

The pre-inspection planning for the inspection was well executed. It was obvious that time was spent reviewing the operator's DIMP Plan prior to the inspection. The inspection was thorough as all aspects of Subpart P related to Plan contents was covered. The inspection was conducted in a very professional manner. The inspectors interacted with operator personnel in a manner that created an environment of cooperation and candidness. No issues or best practices were identified during the observation of the inspection. No points were deducted for Part G of this program evaluation.

---

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:

The MOPSC is not an interstate agent.

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

The MOPSC is not an interstate agent.

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

The MOPSC is not an interstate agent.

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

The MOPSC is not an interstate agent.

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

The MOPSC is not an interstate agent.

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

The MOPSC is not an interstate agent.

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

The MOPSC is not an interstate agent.

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

Evaluator Notes:

The MOPSC is not an interstate agent.

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

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

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

The MOPSC does not have a Section 60106 agreement with PHMSA.

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

The MOPSC does not have a Section 60106 agreement with PHMSA.

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

The MOPSC does not have a Section 60106 agreement with PHMSA.

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

The MOPSC does not have a Section 60106 agreement with PHMSA.

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

The MOPSC does not have a Section 60106 agreement with PHMSA.

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

The MOPSC does not have a Section 60106 agreement with PHMSA.

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

Evaluator Notes:

The MOPSC does not have a Section 60106 agreement with PHMSA.

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