

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

2016 Gas State Program Evaluation

for

NEW HAMPSHIRE PUBLIC UTILITIES 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: New Hampshire

Agency Status:

Date of Visit: 06/27/2017 - 06/29/2017

Agency Representative: Randy Knepper, Director, Safety Division

PHMSA Representative: Jim Anderson

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

Name/Title: Martin P. Honigberg, Chairman

Agency: New Hampshire public Utilities Commission

Address: 21 S. Fruit Street, Suite 10

City/State/Zip: Concord, New Hampshire 03301-2429

Rating:

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

INSTRUCTIONS:

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2016 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. A deficiency in any one part of a multiple part question should be scored as needs improvement. Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual progress report attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART G):

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

Scoring Summary

PARTS

Possible Points Points Scored

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

10	9.5
13	13
48	48
15	15
6	6
8	8
11	11
0	0
0	0

TOTALS

111 110.5

State Rating

99.5

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

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

Reviewed data and it appears correct. No issues.

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

Reviewed data and it appears correct. No issues.

Construction days combined with standard inspection days as defined in written procedures.

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

Reviewed data and it appears correct. No issues.

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

Reviewed data and it appears correct. No issues.

No incidents in 2016.

5	Accuracy verification of Compliance Activities - Progress Report Attachment 5 Yes = 1 No = 0 Needs Improvement = .5	1	0.5
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Evaluator Notes:

Needs improvement. Upon reviewing data there were errors on the number of previous year carry over violations and number of probable violations corrected.

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

No issues. When asked all files were easily retrieved.

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

Reviewed data and it appears correct. Also reviewed TQ SABA website for training information. No issues.

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

NH PUC has automatic adoption for adopting federal rules and regulations.

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:

Program Goals and Accomplishments and areas of Improvement were described in detail in Attachment 10 of Progress Report and are consistent with the program goals Supplied in the Grant Application. Most of the elements of Appendix S of the Guidelines can be found. Many of the goals are long term and will take multiple years to accomplish (accelerated replacement programs). Short term goals of strong enforcement, greater transparency on website, improve metrics of emergency response time and decrease of outstanding leaks have been met.

10	General Comments:	Info Only
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Info Only = No Points

Evaluator Notes:

Total points scored for this section: 9.5
Total possible points for this section: 10



PART B - Program Inspection Procedures

Points(MAX) Score

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

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections last revised in Dec 2016 found this item is listed located on page 6, under Routine Inspections within Section V. Types of Inspections. All inspections will be performed at least every five years using Federal Form 2. These are supplemented with NH inspection modules covering specific areas and further supplemented by Specific Activity Items Inspections. Collectively these will comprise and cover the components of Standard Inspections.

First bullet: Instructions pertaining to pre-inspection are located on page 11 under Section VIII Inspection Preparation, page 2, Section III Notice of Inspection; and page 13 under Section IX Miscellaneous/General.

Second bullet: Inspection activities instructions are addressed on page 2, Section III Notice of Inspections; page 11 under Section VII. Documentation; and page 13 under Section IX Miscellaneous/General.

Third bullet: Post-Inspection activities is located on page 11, Section VII Documentation and page 13 under Section IX Miscellaneous/General.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections last revised in Dec 2016 found this item is listed located on page 6, under Integrity Management Inspections within Section V. Types of Inspections. All inspections will be performed at least every five years using Federal Form PHMSA GT IA form for the former Protocols A-N. Form 16 can be used for subsequent assessments in the field (typically ILI). This Integrity Management Inspections is comprised of Distribution IMP and Transmission IMP. Federal Database updates are required when they are configured to upload the data..

First bullet: Instructions pertaining to pre-inspection is located on page 11 under Section VIII Inspection Preparation, page 2, Section III Notice of Inspection; and page 13 under Section IX Miscellaneous/General.

Second bullet Inspection activities instructions are addressed on page 2, Section III Notice of Inspections; page 11 under Section VII. Documentation; and page 13 under Section IX Miscellaneous/General.

Third bullet: Post-Inspection activities is located on page 11, Section VII Documentation and page 13 under Section IX Miscellaneous/General.

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| 3 | OQ Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections dated Dec 2016 found this item is listed on page 9 under Section V. Operator Qualification Inspections will be performed at least every five years using the Federal Form 14 for Protocols 1-8. Uploading results to the federal database (when possible) is a requirement.

Items pertaining to pre-inspection is located on page 11 under Section VIII Inspection Preparation and page 2, Section III Notice of Inspection.

Inspection activities instructions are addressed on page 2, Section III Notice of Inspections; page 11 under Section VII. Documentation; and page 13 under Section IX Miscellaneous/General.

Post-Inspection activities is located on page 11, under Section VII Documentation and page 13 under Section IX

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| 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.
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections last revised Dec 2016 found this item is listed on page 9 under Section V Damage Prevention Inspections will be performed on a limited basis not to exceed 5 years. Note The Safety Division rarely performs Damage Prevention Inspections except to review the Operator's O&M and OQ plans that pertain to Damage Prevention. Most field inspections are referred to the Underground Damage Prevention Specialist to investigate and enforce. The Safety Division Underground Damage Prevention Guidelines discusses the enforcement procedures.

Instructions pertaining to pre-inspection is located on page 11 under Section VIII Inspection Preparation, page 2, Section III Notice of Inspection; and page 13 under Section IX Miscellaneous/General.

Inspection activities instructions are addressed on page 2, Section III Notice of Inspections; page 11 under Section VII. Documentation; and page 13 under Section IX Miscellaneous/General.

Post-Inspection activities is located on page 11, Section VII Documentation and page 13 under Section IX Miscellaneous/General.

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

New Hampshire PUC Guidelines for Pipeline Safety Inspections last revised in Dec 2016 found this item is listed On-Site Operator Inspections under Section V. Types of Inspections will be performed on a limited basis with no associated inspection interval. These are rarely performed and classified as such. New Hampshire restricts the use of On Site Operator Training given by inspectors as an Inspection Type and is listed on page 8.

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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.
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

A review of New Hampshire PUC Guidelines for Pipeline Safety Inspections last revised in Dec 2016 found this item is listed located on page 6, under Routine Inspections within Section V Types of Inspections. All inspections will be performed on a limited basis with no specific associated inspection cycle and make up the applicable OPS Forms 2 and 5. These are supplemented with NH inspection modules covering specific areas and further supplemented by Specific Activity Items Inspections. Collectively these will comprise and cover the components of Design Testing and Construction. Typically these inspections are reserved for material selections for new systems, valve spacing design criteria (state) and bridge crossings. Most everyday construction activities fall under Standard Inspections since they are connected to existing systems and incorporate written procedures into the O&M manual.

Instructions pertaining to pre-inspection is located on page 11 under Section VIII Inspection Preparation, page 2, Section III Notice of Inspection; and page 13 under Section IX Miscellaneous/General.

Inspection activities instructions are addressed on page 2, Section III Notice of Inspections; page 11 under Section VII. Documentation; and page 13 under Section IX Miscellaneous/General.

Post-Inspection activities are located on page 11, Section VII Documentation and page 13 under Section IX Miscellaneous/General.

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

Evaluator Notes:

New Hampshire PUC Guidelines for Pipeline Safety Inspections last revised Dec 2016 found these items are listed under Section VI. Risk Based Inspection Process. Inspection Risk Criteria spreadsheet shows the following items. 18 Different Risk Criteria are used:

Item a, is located in Inspection Risk Criteria, number 2.

Item b, is located in Inspection Risk Criteria, number 10 thru 14

Item c, is located in Inspection Risk Criteria, number 15

Item d, is located in Inspection Risk Criteria, number 1, 16, 18

Item e, is located in Inspection Risk Criteria, number 17

Item f, this is determined by Program Manager based on each operator and is specific to each type of operator.

NH indicated they update the categories annually but the overall risks rankings have not relatively changed between operators over the recent years.

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

Evaluator Notes:

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



PART C - Program Performance

Points(MAX) Score

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

A. Total Inspection Person Days (Attachment 2):
176.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 2.00 = 440.00

Ratio: A / B
176.00 / 440.00 = 0.40

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

Evaluator Notes:

No issues. Ratio of 0.4 is greater than the needed ratio of .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

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

D Burnell, J Vercellotti, and R Knepper have completed OQ Training.
J Vercellotti, and R Knepper have completed DIMP and IMP Training.
D Burnell, J Vercellotti, and R Knepper have completed Root Cause Training.
All three have obtained minimum qualifications to lead Standard Inspection as Lead Inspector.

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

Evaluator Notes:

R Knepper has nearly 13 years experience as Program Manager and has been past NAPSIR Chair and Chairs the NARUC Pipeline Staff Subcommittee as well as participates on various NAPSIR Subcommittees, as well as CGA committees and GTI committees.

- 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:

Z Barrett letter to Chairman dated 10/21/16 and noted deficiencies for CY 2015.
Chairman Honigberg return letter to Z Barrett dated 12/16/16 addressed deficiencies of CY 2015.
The 60 day requirement was met.

- 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:

NH PUC in conjunction with the New England Pipeline Safety Representatives (NEPSR) held the TQ seminar on October 21-22, 2016 in Portland, Maine.

The number of attendees were approximately two hundred.

NEPSR holds a TQ Seminar each year in October on a rotating basis for States Hosting (6 states).

PHMSA T&Q and PHSA Eastern Region Meeting representatives were in attendance and participated.

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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
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
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Evaluator Notes:

Since the CY 2015 Evaluation, NH has developed a spreadsheet that will be used in the interim until a new database is selected and implemented that has programmed logical interval scheduler and code section reviewer. The time intervals in the procedures were able to be met because of the consolidation of the LPG operators and associated inspection units. Many of the LPG operators were going away from individual plans at the local or regional office to more corporate based plan that are used throughout the inspection units.

A review of files and NH PUC written procedures confirm all inspections were scheduled in accordance to the established time intervals listed under Section IV Intervals of Inspections described on pages 2-5.

(New Hampshire is awaiting the results of the PHMSA pilot with state of Washington in 2017 before deciding on how to use IA.)

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

Yes, New Hampshire uses the federal forms or a version of the inspection forms to perform their inspections. With the exception of Drug and Alcohol Inspections, Inspection reports found all answers were completed with S, U, NA & NC in the appropriate block along with comments in the inspector remarks section. New Hampshire does not use S+ or Concern on their inspection reports. NH also requires inspectors to fill out comments so that rationale for the inspection result is evident. Nearly all inspections are accompanied by photo documentation.

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

This is shown on PHMSA Form 2 and NH PUC inspection Form 4 Comprehensive Corrosion (reviewed Form 4 for verification).

Unitil (Northern Utilities) lists in Section 6.3.3 of their O&M this requirement. Each segment requires replacement or repair. Liberty lists in Section 8B Examination of a Buried Pipe When Exposed in subsection 6.2 Inspection for Graphitization describes inspection and requires replacement or repair.

LPG Operators and Transmission Operators do not use Cast Iron.

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

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

Comments:

Liberty is required to file all leaks, all Cast Iron breaks on a monthly basis to the Safety Division per Puc 508.05 (d) and 509.15. The Safety Division plots those leaks for trending.

In addition Puc rule 508.04 (d) requires continuous monitoring during the winter months of any system containing cast iron.

Lastly Liberty partakes in a Cast Iron Bare Steel accelerated replacement program where all replacements are ranked for priority of replacement. This program is annually docketed, requires interactive participation with the NH PUC Safety Division and reviewed formally with the Commission.

Liberty's O&M Manual Procedure 11-B "Continuing Surveillance, Subsection 6.1.5 Review and Analysis of Records states Engineering department will initiate action after reviewing Leakage Survey Records including Leak Repair Work Orders and Leak Re Evaluation Work Orders as well as Pipeline Patrol Work Orders, Subsection 6.1. Scheduled Inspection Requirements references 6.1.2 Action Criteria options such as repair, recondition, replace or retire with an accompanying schedule.

Unitil has less than a mile of cast iron which will be removed in CY 2017.
LPG Operators and Transmission Operators do not use Cast Iron.

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

Liberty's O&M contains this in Section 12 C Leakage Surveys subsection 6.7 Leakage Investigation for Leakage Surveys
Liberty's Emergency Response plans has numerous references to Leak Investigation (section B, F, H, and Appendices)
Liberty's O&M in section 12B Leak Response, Leak Classification, Leak Repair subsection 6.1.6 Investigating an outside leak makes specific references to migration and multiple building checks (at least 5).

Unitil's O&M lists this in Section 2 N Leak Management subsections 1.0 General and 3.2 Sub-Surface Gas Detection Survey (including barhole surveys). Unitil's Emergency Response Plan section IV. EMERGENCY RESPONSE PROCESSES references in subsection C Initial Response & Reporting states "If the emergency involved an indication of a gas leak it shall be graded and investigated in accordance with Unitil's O&M Manual (Section 2-N Leak Management)".

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

Leak Response is reported monthly by Liberty and Unitil per Commission Orders. These include 3rd party Damage and usually result in Class I Leak.

Monthly records are tracked and graphed by the Safety Division. . Times are specified to be 30 minutes, 45 minutes or 60 minutes depending upon the time of discovery. For small operators it is limited to 30 minutes.

Third Party Damages are required to be reported monthly and these are tracked by the Underground Damage Prevention Specialist. Each damage is reviewed to ensure appropriate operator response.

Previous Accidents, while few, are also required to be reviewed for Emergency Response Times.

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

Operator Annual Reports are reviewed, data analyzed and trending performed for Liberty and Unitil and formerly NH Gas.
Historical Tracking is achieved and results posted on Safety Division Websites.
Accuracy of data reflects the data integrity issues each company has.

EFVs data for Liberty are questionable and Operator has been contacted of the issue. NOPV's have been issued for failing to report Mechanical Fittings. Progress Report reflects the review of Incidents for 2015 and that reflects State has determined different causes reported. In CY 2015 Unitil was issued a violation for not filing Incident Reports on time.

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

OQ and IMP inspections are updated into federal database or use IA forms. Timeliness is based on PHMSA's changing of security issues, accessibility to the databases, types of forms that can be uploaded. Most of these require multiple phone calls and attempts to upload.

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

NPMS is updated annually for the lone transmission line of Liberty, typically an email copy is sent to the Safety Division.

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| 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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

New Hampshire completed comprehensive Drug and Alcohol Inspections in 2016 for both operators. A letter of concern was generated.

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| 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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

OQ plans are required to be submitted annually per Puc 506.02 (t) including notifications of changes. Field verification is performed often during field inspections.

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

IMP plans are required to be submitted annually per Puc 506.02 (t) including notifications of changes. The Safety Division just switched from an 84 month review to a 60 month review. The transmission lines are piggable or made of plastic so the IMP inspections are not complex for the 19 miles of transmission pipeline. Latest pipeline run was in Nov 2015 with anomaly dig in 2016.

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| 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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

The Safety Division staggers them. The plans are required to be submitted annually by Puc 506.02(t). Liberty and Unitil was a comprehensive review and completed in 2013. Both will be reviewed in 2017 again to maintain 5 year interval. Mandated accelerated replacement programs require operators to replace leak prone pipe and were in place prior to DIMP implementation.

LPG Operators use ITS's, a New England Consortium, plan.

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| 19 | Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. 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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

PAPEI Inspections were completed for Liberty and Unitil in November 2016. Smaller LPGs have a simplified verification process.

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

The Safety Division website has information including enforcement for damage prevention activities and pipeline safety violations. The Safety Division is looking to enhance this in 2017 to include all enforcement actions pending Commission approval.

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

No SRCs in CY 2016.

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

Evaluator Notes:

New Hampshire PUC Order 2570 in 2012 makes this an annual requirement. All Adyl A failures are reported to PPDC and the PUC.

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

Evaluator Notes:

Yes.

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

Evaluator Notes:

There has only been one waiver ever by the NHPUC and it was outdated. NH PUC requested the removal of the LNG waiver granted on February 11, 1993 be removed from PHMSA website. This request was submitted by R Knepper on November 7, 2014 and the wavier has been removed from PHMSA website in 2015.

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

Evaluator Notes:

R Knepper attended the meeting in Indianapolis, IN from September 26-September 30, 2016 and conducted a legislative meeting and new program managers meetings to help newest members.

- 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:

There was discussion and review of the PHMSA State Metrics webpage during the evaluation.

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

Evaluator Notes:

There was discussion concerning the SICT during the evaluation.

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

Evaluator Notes:

No pipelines in NH can reverse flow.

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

Evaluator Notes:

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



PART D - Compliance Activities

Points(MAX) Score

- | | | | |
|----------|--|---|---|
| 1 | Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1
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:

These procedures are listed in the NH PUC Pipeline safety Guidelines, Section X Enforcement Procedures on Pages 14-16. Also, PUC Rules 511.01-511.10 requires a response for the operator within centin time frames on NOPVs and NOVVs.

- | | | | |
|----------|--|---|---|
| 2 | Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1
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:

These procedures are listed in the NH PUC Pipeline safety Guidelines, Section X Enforcement Procedures on Pages 14-16. Written compliance actions are sent to an officer of private utilities, including LPG operators. A reference to civil penalties imposed by RSA 374:7-A are included in the letter.

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

Evaluator Notes:

Yes. No issues found.

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

Evaluator Notes:

Due process is built into the PUC 511.09 rule and can be appealed or adjudicated to the Commission.

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

Evaluator Notes:

PUC Rule 511.05 and 511.08(b) states the severity considerations, repeatd violations and gravity of the violation are factors to be concidered.

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

Evaluator Notes:

Civil penalties issued in 2016 totaled \$156,500.

7

General Comments:

Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

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

Evaluator Notes:

These procedures are listed in the NH PUC Pipeline safety Guidelines, Section V, Failure Investigation Inspections on Page 5 describing the receiving and responding to operators reports of incidents.

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

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

Evaluator Notes:

PUC Rule 504.05, Emergency Notification has requirements to notify promptly by telephone the Safety Division within one hour of incidents and type of information supplied with requirements to notify OPS.

PUC Safety Division updates a quarterly contact information sheet with 3 people on call 24/7 and distributes to all operators.

- | | | | |
|---|--|---|---|
| 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
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

Safety Division investigate all DOT reportable incidents.

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

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

Evaluator Notes:

No incidents in 2016.

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

Evaluator Notes:

No incidents in 2016.

- | | | | |
|---|---|---|----|
| 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
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|---|---|---|----|

Evaluator Notes:

No incidents in 2016.

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

Yes = 1 No = 0

Evaluator Notes:

incidents are on state website and are shared at NAPSR region meetings.

8 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

Total points scored for this section: 6
Total possible points for this section: 6



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

Evaluator Notes:

NH PUC Rule 805.02(e) covers trench less technology and Rule 806.01, 806.02, 806.03, 806.04, 806.05 identify marking zone tolerance, markers, identification, emergency and marking certain newly installed underground facilities. Additionally, NH PUC form Damage Prevention Module includes this item in section 192.614 (5 & Sa). A review of one operator, Liberty Utilities Procedure Damage Prevention Section 11.C 6.6.7 was reviewed and found correct. Unil (Northern Utilities) states in section 2G of the O&M "Each natural gas utility shall maintain written procedures for protecting existing underground facilities during directional drilling and other trenchless technology installation techniques. These written procedures shall utilize the guidance material provided by the Gas Piping Technology Committee (GPTC) detailed in Guidance Material Appendix G-192-6, or other recognized industry standard. [ME Puc 420.3D] Refer to Appendix 2-G, GPTC Guide Material G-192-6."

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

Evaluator Notes:

NH PUC requires operators to report marking of underground facilities and any mismark or failed to mark. In addition to the federal inspection form, NH PUC inspectors use the damage prevention module E-26 to review notification, marking, positive response and the use of the one call system. The reporting requirement is reviewed by their Damage Prevention Specialist each month. Positive Response is required by PUC rule PUC 804.02(e) and 806.02 (a)(2).

- | | | | |
|---|--|---|---|
| 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.)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

This is accomplished by the local distribution companies being a member of the Hampshire Management Underground Safety Training (MUST) organization which is a recognized regional CGA partner. NH PUC has several best practices in locating underground facilities pertaining to using only company personnel in locating their gas lines and NH PUC rule 804.03 Training of Locators. This best practice was implemented thru individual NH PUC Order to each company operator. All nine elements have been adopted by the NHPUC as recognized by the 2014 PHMSA Characterization Tool Results.?

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

Evaluator Notes:

NH PUC collects data on pipeline damages per 1,000 locate request. Operators and excavators are required to submit monthly causes of excavation damage and final determinations are made after due process in accordance with NH PUC Rule 804.01 (a-e) (E-26). Trends are plotted and reviewed by staff. A review of data found the number of damages per 1,000. In CY2016 it was 1.27 and CY2015 it was 1.41. Past 6 years are found on the Safety Division Website under "Overall NH Damage Prevention Statistics" Reviewed information on NH PUC website.

- | | | | |
|---|--|-----------|-----------|
| 5 | General Comments:
Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

Total points scored for this section: 8

Total possible points for this section: 8



PART G - Field Inspections

Points(MAX) Score

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

Name of Operator Inspected:

(1) Liberty Utilities (2) Liberty Utilities

Name of State Inspector(s) Observed:

(1) David Burnell (2) Joe Vercellotti

Location of Inspection:

(1) Nashua, NH (2) Manchester, NH

Date of Inspection:

(1) 6/28/2017 (2) 6/28/2017

Name of PHMSA Representative:

Jim Anderson

Evaluator Notes:

-
- 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:

(1) Yes

(2) Yes

-
- 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:

(1) Yes

(2) Yes

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

Evaluator Notes:

(1) Yes - no issues

(2) Yes - no issues

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

Evaluator Notes:

(1) Yes

(2) Yes

-
- 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:

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

- (1) Yes
- (2) Yes

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) Yes = 1 No = 0	1	1
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Evaluator Notes:

- (1) Yes
- (2) Yes

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

- (1) None found
- (2) None found

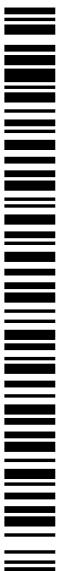
10	General Comments: 1) What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) 2) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) 3) Other. Info Only = No Points	Info Only	Info Only
----	---	-----------	-----------

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

Evaluator Notes:

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



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

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

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

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

Evaluator Notes:

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

Evaluator Notes:

- | | | | |
|----------|--|---|----|
| 3 | 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.)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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