

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

2016 Gas State Program Evaluation

for

RHODE ISLAND DIVISION OF PUBLIC UTILITIES AND CARRIERS

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: Rhode Island

Agency Status:

Date of Visit: 09/11/2017 - 09/15/2017

Agency Representative: Don Ledversis, Gas Pipeline Safety Engineer

PHMSA Representative: Patrick Gaume

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

Name/Title: Mr. Macky McCleary, Administrator

Agency: Rhode Island Division of Public Utilities and Carriers

Address: 89 Jefferson Blvd.

City/State/Zip: Warwick, Rhode Island 02888

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
48	45
15	15
6	6
8	8
12	12
0	0
0	0

TOTALS

112 109

State Rating

97.3

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

Evaluator Notes:

A1. Yes. Attachment 1 is consistent with Attachment 3 and Attachment 8.

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

Evaluator Notes:

A2. Yes. Attachment 2 is consistent with the time sheets.

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

Evaluator Notes:

A3. Yes. Attachment 3 is correct and consistent with internal records.

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

Evaluator Notes:

A4 Yes. There were no significant incidents in 2016. RI PUC choose to report an AOC that had been called into the NRC. A 200-psi pipe, valves, & fittings were pressured to 700 psi. A PV was issued, a \$12,500 civil penalty was assessed and received, necessary PL facilities were replaced, and overpressure protection was installed.

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

Evaluator Notes:

A5. Yes. Attachment 5 is correct and consistent with internal records.

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

Evaluator Notes:

A6. Yes. The files are in Don's office or in the database. Most official files are still paper.

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

Evaluator Notes:

A7. Yes. Don's training is in agreement with TQ records.

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

Evaluator Notes:

A8. Yes. RI State Laws authorize automatic adoption of updates of named 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:

Yes; Attachment 10 was properly completed. A damaged LNG plant was decommissioned. It is being demolished in 2017. A new inspector, Lateef Olajide, was hired January, 23, 2017. He is a 100% pipeline safety employee. I recommended that the bare steel & cast iron replacement program continue to be noted in future Attachment 10 reports. 63 miles of bare steel & cast iron were replaced in 2016 at a cost of \$101MM. I also recommended that State Program Performance Metrics be discussed in future Attachment 10 reports. Damage Prevention efforts are continuing and excavation damages dropped for 4 years in a row with an uptick in 2015 and a decline in 2016. Line hits have dropped from 166 in 2010 to 114 in 2014 up to 165 in 2015 and now down to 136 in 2016.

10 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

A10. This section was awarded full points. The strong effort to replace bare steel & cast iron continues. Low pressure systems, from 0 to 25 psig, are being replaced with PE to reduce water intrusion into the distribution systems. Damage Prevention efforts are continuing. RIDPUC was authorized to increase staff in Pipeline Safety from 1 to 2 FTE, and Lateef Olajide was hired in January of 2017. Lateef has started his TQ classes.

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:

B1. Yes. See Procedure Manual, Book 1, Sections IV & V, pages 8-15. Directed recommendation: Through 2016 the Procedure Manual was adequate because it was Don's personal to-do book. Given a new and inexperienced employee, the Procedure needs more precise directions concerning pre-inspection, inspection, and post-inspection activities. This has potential impact on questions B1 through B4 & B6.

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

B2. Yes. See Procedure Manual, Book 1, Sections IV & V, pages 8-15. Directed recommendation: Through 2016 the Procedure Manual was adequate because it was Don's personal to-do book. Given a new and inexperienced employee, the Procedure needs more precise directions concerning pre-inspection, inspection, and post-inspection activities. This has potential impact on questions B1 through B4 & B6.

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

B3. Yes. See Procedure Manual, Book 1, Sections IV & V, pages 8-15. Directed recommendation: Through 2016 the Procedure Manual was adequate because it was Don's personal to-do book. Given a new and inexperienced employee, the Procedure needs more precise directions concerning pre-inspection, inspection, and post-inspection activities. This has potential impact on questions B1 through B4 & B6.

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

B4. Yes. "Damage Prevention Activities" was recently moved to Section V, sub-section M on page 14. It is also part of the Standard Inspection, see 192.614. Directed recommendation: Through 2016 the Procedure Manual was adequate because it was Don's personal to-do book. Given a new and inexperienced employee, the Procedure needs more precise directions concerning pre-inspection, inspection, and post-inspection activities. This has potential impact on questions B1 through B4 & B6.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

B5. Yes. See Procedure Manual, Book 1, Sections IV & V, pages 8-15. Training is also done during the annual Pipeline Safety Seminars, 1/yr; Managing Underground Safety Training Seminars, 2/yr; and during all inspections.

- 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

Evaluator Notes:

B6. Yes. See Procedure Manual, Book 1, Sections IV & V, pages 8-15, specifically page 12. RIDPUC uses the RI plastic construction form, the RI steel construction form and/or the federal Form 5-EVALUATION REPORT OF GAS PIPELINE & COMPRESSOR STATION CONSTRUCTION as needed. Directed recommendation: Through 2016 the Procedure Manual was adequate because it was Don's personal to-do book. Given a new and inexperienced employee, the Procedure needs more precise directions concerning pre-inspection, inspection, and post-inspection activities. This has potential impact on questions B1 through B4 & B6.

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

B7. Yes. See Procedure Manual, Book 1, Section IV, pages 8-9. The main point is that every operator is seen every year. Directed recommendation: Through 2016 the Procedure Manual was adequate because it was Don's personal to-do book. Given a new and inexperienced employee, going forward, the inspection priorities need to be put into a spreadsheet and incorporate risk weighted threats to the individual Units.

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

Evaluator Notes:

B8. This section was awarded full points. The Procedure Manual is currently a reasonably written reference for Don. It needs significant revision to accommodate a new & inexperienced inspector. I shared Appendix S in the State Guidelines with Don.

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):
110.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
 $220 \times 0.96 = 211.20$

Ratio: A / B
 $110.00 / 211.20 = 0.52$

If Ratio ≥ 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0
Points = 5

Evaluator Notes:

C1. Yes. 110 AFOD 0.96 person-year $110 / (.96 \times 220) = .521$, $> .38$ okay

- 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:

C2. Yes to all. No outside training other than OJT, Seminars, and Conferences

- 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:

C3. Yes. No issues.

- 4 Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

C4. Yes. Response was in about 49 days; from 11/16/2016 to 1/4/2017. All four issues were addressed.

- 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:

C5. Yes. The most recent Seminar was in Oct 19-20, 2016 in South Portland, ME.

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

Evaluator Notes:

C6. NI. 4 of 5 points, continuing problem from last year. ---The Transmission inspection issues have been addressed by

having the operator, National Grid, enter into a Compliance Order Agreement to re-work the city gates and convert the short sections of transmission line into distribution main lines. Two sections were converted in 2016 & the third was converted in 2017. A 4th short section of <20% SMYS pipe was just identified as Transmission and reported to RIDPUC on 9/12/17. It is being scheduled for conversion into a city main in 2020 or sooner if it can be scheduled with PUC approval.

---The single LDC, National Grid, has been DIMP inspected with yearly updates. The 43 MM & LPG operators were notified about DIMP in 2011 & had DIMP explained. In July, 2015, RIDPUC agreed to start doing 10 DIMP inspections/yr, risk ranked, and wrote the plan into his procedures. In the last half of 2015 & the first half of 2016, RI performed 21 DIMP inspections and several more from 9/2016 until 9/2017. 11 DIMP inspections remain and are scheduled to be conducted my mid-year 2018. This response meets the agreement made during the July, 2015 Program Evaluation.

---NI. PAPEI inspections still NI: The single LDC, National Grid, was inspected for PAPEI & it was loaded into the database. In July, 2015, RIDPUC agreed to start doing 15 PAPEI inspections/yr, risk ranked, and write the plan into his procedures. In the last half of 2015 & the first half of 2016, RI has performed 21 PAPEI inspections and several more from 9/2016 until 9/2017. 11 DIMP inspections remain and are scheduled to be conducted my mid-year 2018. This response meets the agreement made during the July, 2015 Program Evaluation. However, RIDPUC continues to be unable to download the PAPEI database and therefore has not been able to upload the PAPEI inspections into the federal database.

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

Evaluator Notes:

C7. Yes. The information reviewed showed no issues. PHMSA form 2 is used on the National Grid inspection. The federal forms are used for all types of inspections except for Construction. The State Construction Forms are adequate and the Federal Form is referenced as needed.

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

Evaluator Notes:

C8. Yes. There is a Cast iron encroachment & replacement program in place with National Grid, no issues.

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

Evaluator Notes:

C9. Yes. There is a Cast iron encroachment & replacement program in place with National Grid, no issues.

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

Evaluator Notes:

C10. Yes. This is verified on PHMSA form 2 inspection checklist.

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

Evaluator Notes:

C11. Yes. 192.617 is covered on inspection checklist

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- | | | | |
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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:

C12. Yes. The only applicable operator is National Grid. Trends and data are being adequately addressed. No issues.

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

C13. NI, this is a continuing problem. 1 of 2 points. Zero DIMPs have been uploaded into the Federal database.

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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:

C14. Yes. The LDC, National Grid, is converting the short transmission lines, typically 30-60', into distribution mains in a timely manner after discovery. A problem for delay is that these conversions are expensive enough that they must have PUC approval before they can be eligible for rate recovery. This is an example of a conflict between Rate enforcement and Regulation enforcement.

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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:

C15. Yes, there is only one LDC in RI, National Grid, and the D&A long form is used every year during the annual HQ inspection. The other 43 operators are MM & LPG companies.

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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:

C16. Yes. The OQ plan for National Grid is up to date. all ok. The MM & LPG operators are guided into acceptable OQ Plans and provided with a list of consultants who are compliant with those OQ Plans.

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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 | 1 |
|-----------|--|---|---|
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Evaluator Notes:

C17. NI 1 of 2 points. The TIMP issue has been addressed by having the operator, National Grid, enter into a Compliance Order Agreement to re-work the city gates and convert the short sections of transmission line into distribution main lines. The problem is that the LDC, National Grid, has delayed the conversion work and has failed to develop a TIMP and has failed to submit Annual Reports for its transmission lines. RIDUC needs to enforce the Compliance Order and/or the TIMP and Annual Reports. This problem has been noted since 2015.

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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 |
|----|---|---|---|

Evaluator Notes:

C18. Yes. The DIMP is reviewed annually for the LDC, and a plan has been in place since mid-2015 for DIMP reviews of MM & LPG operators. The MM & LPG DIMP reviews are current with the plan and should be current by mid-2018.

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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 |
|----|--|---|---|

Evaluator Notes:

C19. Yes. The PAPEI is current for the LDC, and a plan is in place for PAPEI reviews of the LPG operators. The MM are guided into compliance.

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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 |
|----|--|---|---|

Evaluator Notes:

C20. Yes. Public records are accessible, web-site is in place for docketed information. See http://www.ripuc.org/utilityinfo/natgas/Pipeline_safety.html

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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 | 1 |
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Evaluator Notes:

C21. Yes. The LNG tank was compromised and de-commissioned. As of 9/11/17 it is being demolished, there is a hold up due to asbestos being found in the paint on the tank. There were no SRC in CY 2013, 14, or 2015.

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

C22. Yes. No issues and National Grid participates in PPDC.

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

Evaluator Notes:

C23. Yes. RI responds to all NAPSRS & PHMSA requests

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

Evaluator Notes:

C24. NA. RI has not issued any waivers/special permits that are currently active

- 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:

C25. YES. Don was able to attend the Nat'l NAPS Meeting in Indianapolis, IN. He is planning to send the new Inspector, Lateef Olajide, to the National NAPS Meeting in Columbus, OH in 2017. It will facilitate Lateef being able to attend the 'New Program Manager Orientation and Roundtable.

- 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:

C26. YES. RIDPUC data appears to be accurate. Damage Prevention efforts are continuing and excavation damages dropped for 4 years in a row with an uptick in 2015 and a decline in 2016. The line hit increase in 2015 & 2016 is most likely due to a 2015 law that requires operators and excavators to report all line hits. Line hits have dropped from 166 in 2010 to 114 in 2014 up to 165 in 2015 and now down to 136 in 2016. RIDPUC is continuing its strong effort to replace bare steel and cast iron. Low pressure systems, from 0 to 25 psi, are being replaced with PE plastic pipe to reduce water intrusion into the distribution systems. Replacement of bare steel and cast iron pipe was started in 2009, but a new program was started in 2015 to replace all bare steel and cast iron gas lines in the State within 20 years. Effectively all of the lines will be replaced with plastic pipe by 2034. A new program that was started in 2017 is to replace 200 high pressure bare steel services based on a new risk algorithm. The trend that discovered and justified the work was compiled in late 2016.

- 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:

C27. The IDCT requires time and attention. Porting the exact same data from 2016 to 2017 has resulted in a skewed result, from 144 inspection days to 557 inspection days, and more time is needed to sort out the problem.

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

Evaluator Notes:

C28. NA. No operators in RI had flow reversals in 2016, nor are any expected soon. RIDPUC will notify operators to consider and model effects of flow reversals when such activities are planned.

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

Evaluator Notes:

C29. 3 points were lost in this Section, in C6, C13, & C17. Work continues to become current in all types of inspections and upload them into the federal databases.

Total points scored for this section: 45
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:

D1. Yes. The RIDPUC Pipeline Safety Procedures, Section V Subsections P thru U, are adequate.

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

D2. Yes. Four files with violations and civil penalties were showed to be complete.

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

Evaluator Notes:

D3. Yes, through review of inspection records along with review of compliance activities it appears all violations are addressed appropriately.

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

D4. Yes. Due process is given to all parties.

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

D5. Yes, civil penalties considered and used.

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

D6. Yes. There were 7 compliance actions that totaled \$89,340 assessed, and \$63,700 collected in 2016.

7 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

D7. Yes. This section was awarded full points. RIDPUC uses the full suite of regularity tools, including civil penalties, to achieve compliance with the regulations.

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



PART E - Incident Investigations

Points(MAX) Score

- 1 Does the state have written procedures to address state actions in the event of an incident/accident? 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

E1. Yes. See Procedure Manual, Section VI, pages 16-18.

- 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:

E2. Yes. No issues.

- 3 If onsite investigation was not made, did state obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 1 NA

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

E3. NA, there was no significant incident in 2016. As a practice, most significant incidents and many minor incidents are responded to with an on-site visit. Procedures are in place to document any incidents that are telephonically investigated.

- 4 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? 3 NA

Yes = 3 No = 0 Needs Improvement = 1-2

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

Evaluator Notes:

E4. NA, there was no significant incident in 2016.

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

Yes = 1 No = 0

Evaluator Notes:

E5. NA, there was no significant incident 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 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

E6. Yes. RI is a good partner with the Eastern Region. No requests were received in 2016 concerning incidents.

- 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:

E7. Yes. RI makes a detailed report during Region and NEPSR Meetings

8 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

E8. Yes. This section was awarded full points. RI has a robust plan for responding to incidents and usually makes on-site investigations.

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:

F1. Yes, This item is reviewed with National Grid, the LDC serving RI, and it is in National Grid's Damage Prevention Program, Procedure 32. It has also been identified as a Risk in National Grid's DIMP. All sewer cross-bores have been identified and, in 2016, the home residents have been notified with a door hanger that explains the potential threat and advises a call to National Grid if there is any sewer blockage and National Grid will provide a free sewer inspection.

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

Yes. It is in the Std Insp Form, under Damage Prevention, 192.614(c)(1-6).

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

F3. Yes. Don sits on the CGA Technology Committee in NAPS. Lessons learned are shared in the semi-annual M.U.S.T. (Managing Underground Safety Training) Meeting with operators and excavators.

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

F4. Yes. As in previous years, pipeline hits are reviewed with National Grid and data is gathered and sorted by city for specifics.

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

Evaluator Notes:

F5. This section was awarded full points Damage Prevention is an item of specific focus in RIDPUC. Damage Prevention inspections and trainings are performed frequently in RI. RI passed a law in 2017 that demands a call to 911 in the event of a line hit that causes a gas release that could be hazardous in the opinion of the caller.

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:

National Grid opid 13480

Name of State Inspector(s) Observed:

Don Ledversis, Chief Compliance Inspector

Location of Inspection:

Gibbs Av., Newport, RI 02840, and Phelps Rd, Middletown, RI 02842

Date of Inspection:

September 12, 2017

Name of PHMSA Representative:

Patrick Gaume

Evaluator Notes:

G1. National Grid opid 13480, Don Ledversis, Chief Compliance Inspector, Gibbs Av., Newport, RI 02840, and Phelps Rd, Middletown, RI 02842; September 12, 2017, Patrick Gaume

- 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:

G2. Yes. Construction crews were at both sites. The first was a main uprate from <6 psi to 100 psi; replacing cast iron with 6" PE pipe. The second was 10 psi 6" cast iron replacement with 10 psi 2" PE pipe.

- 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:

G3. Yes. These were day visit inspections using the RI State Gas Pipeline Construction Forms for plastic pipe.

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

Evaluator Notes:

G4. Yes. Don worked through the entire checklist. The checklist was particularly applicable to the work being performed.

- 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:

G5. Yes. PPE, hand tools, excavation machine, electrofuse connection, plastic fuse alignment & cutting machine, plastic fusion heating tool, tape measure, vacuum excavation machine, and a fully rigged out crew truck; also fire extinguishers, site security, safety cones and tape, traffic controllers, and police officers.

- 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:

G6. Yes, Field (construction) activity and records associated with the activity.

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:

G7. Yes. Don exhibited a professional level of knowledge for the inspections I observed.

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:

G8. Yes. Don reviewed what was expected for the jobs and the crew demonstrated that they had full knowledge of what was expected for the jobs. No Violations found at either site.

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

G9. Yes. Don reviewed what was expected for the jobs and the crew demonstrated that they had full knowledge of what was expected for the jobs. No Violations found at either site.

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
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Info Only = No Points

- | | | | |
|----|-----------------------------------|-------------------------------------|--|
| a. | Abandonment | <input checked="" 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 checked="" type="checkbox"/> | |
| j. | Deactivation | <input type="checkbox"/> | |
| k. | Emergency Procedures | <input checked="" type="checkbox"/> | |
| l. | Inspection of Right-of-Way | <input checked="" type="checkbox"/> | |
| m. | Line Markers | <input type="checkbox"/> | |
| n. | Liaison with Public Officials | <input checked="" 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 checked="" type="checkbox"/> | |
| x. | Public Education | <input type="checkbox"/> | |
| y. | Purging | <input type="checkbox"/> | |
| z. | Prevention of Accidental Ignition | <input checked="" 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:

G10. This section was awarded full points. Cast Iron pipe was being replaced with PE pipe, at both locations. It appeared that the jobs were being performed by highly professional crews with all materials and equipment were readily available.

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



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

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

Evaluator Notes:

H1-8. NA Not an Interstate Agent.

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

H1-8. NA Not an Interstate Agent.

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

H1-8. NA Not an Interstate Agent.

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

H1-8. NA Not an Interstate Agent.

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

H1-8. NA Not an Interstate Agent.

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

H1-8. NA Not an Interstate Agent.

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

H1-8. NA Not an Interstate Agent.

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

Evaluator Notes:

H1-8. NA Not an Interstate Agent.

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

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

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

Evaluator Notes:

I1-7. NA Not a 60106 agreement State Partner.

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

I1-7. NA Not a 60106 agreement State Partner.

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

I1-7. NA Not a 60106 agreement State Partner.

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

I1-7. NA Not a 60106 agreement State Partner.

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

I1-7. NA Not a 60106 agreement State Partner.

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

I1-7. NA Not a 60106 agreement State Partner.

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

Evaluator Notes:

I1-7. NA Not a 60106 agreement State Partner.

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