



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

1200 New Jersey Avenue SE
Washington DC 20590

2011 Natural Gas State Program Evaluation

for

CALIFORNIA 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)



2011 Natural Gas State Program Evaluation -- CY 2011
Natural Gas

State Agency: California

Agency Status:

Date of Visit: 09/17/2012 - 09/20/2012

Agency Representative: Mike Robertson, Program Manager, Gas Safety & Reliability Branch, CPUC
Sunil Shori, Utilities Engineer, Gas Safety & Reliability Branch, CPUC

PHMSA Representative: Glynn Blanton, USDOT/PHMSA State Programs

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

Name/Title: Michael R. Peevey, President

Agency: California Public Utilities Commission

Address: 505 Van Ness Avenue

City/State/Zip: San Francisco, California 94102

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 2011 (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	10	7
B	Program Inspection Procedures	15	14.5
C	Program Performance	44	35
D	Compliance Activities	14	14
E	Incident Investigations	9	9
F	Damage Prevention	8	7
G	Field Inspections	12	12
H	Interstate Agent State (If Applicable)	0	0
I	60106 Agreement State (If Applicable)	0	0

TOTALS

112 98.5

State Rating 87.9

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 (A1a)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 0 |
|----------|---|---|---|

Evaluator Notes:

Intrastate transmission jurisdiction should be listed as x/60105P instead of x/60105 because CPUC has limited authority to a facility if it is owned and operated by a public utility. The remaining intrastate transmission lines are under PHMSA Western Region authority.

Gas gathering jurisdiction should be listed as x/60105P instead of "B" because PG&E indicated 4.5 miles of gas gathering lines in the 2011 DOT annual distribution and gathering line report. A loss of one point was assessed due to inaccurate information on attachment 1.

Corrections to Attachment 1 will need to be performed in FedSTAR. You will need to e-mail Carrie Winslow the changes before December 31, 2012.

- | | | | |
|----------|--|---|---|
| 2 | Review of Inspection Days for accuracy - Progress Report Attachment 2 (A1b)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 0 |
|----------|--|---|---|

Evaluator Notes:

We verified the total inspection person days for each type of inspection and found they did not compare to the number on Attachment 2. Error was made on the number submitted in the master meter type and other categories. The actual inspection person days are 459 instead of 460. The number of on-site training should be 8 and zero for integrity inspection of master meter operators. Therefore loss of one point occurred.

Corrections to Attachment 2 will need to be performed in FedSTAR. You will need to e-mail Carrie Winslow the changes before December 31, 2012.

- | | | | |
|----------|--|---|---|
| 3 | Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3 (A1c)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 0 |
|----------|--|---|---|

Evaluator Notes:

A review of base grant progress report, Attachment 3, indicated the gas gathering facilities owned by PG&E were not listed in the attachment. Therefore, a loss of one point occurred.

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|----------|--|---|---|
| 4 | Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4 (A1d)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

A check of the PDM web site indicated incident reports do match those documents entered into Attachment 4. Several additional incident reports were included in the attachment that meets CPUC requirements. No issues.

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|----------|--|---|---|
| 5 | Accuracy verification of Compliance Activities - Progress Report Attachment 5 (A1e)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

We reviewed office files and work papers. The compliance activities were accurate. The number of carry over and long term violations continues to have a high number. The largest number come from violations cited against master meter mobile home parks.

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|----------|---|---|---|
| 6 | Were pipeline program files well-organized and accessible? - Progress Report Attachment 6 (A1f, A4)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

CPUC maintains six data bases within their organization to monitor inspection activities and incidents. They are listed below:

1. Mobile Home Park North
2. Mobile Home Park South
3. Propane operators
4. Gas Audits of Public Utilities
5. Incidents-(this includes safety related condition reports and complaints)
6. Non-reportable incidents, recorded on a quarterly basis

Private public utilities (a. Los Angeles office maintains inspection reports for San Diego Gas and Electric, Southern California and Southwest Gas, Southern California Edison and master-metered mobile home park and propane operators located in the Southern section of California.) (b. The San Francisco office maintains inspection reports for PG&E, Southwest Gas Tahoe area, Niska Gas Storage previously named Wild Goose Storage, Inc., Lodi Gas Storage, Gill Ranch Storage, West Coast Gas, Alpine Natural Gas, Central Valley Gas Storage and master-metered mobile home park and propane operators located in the Northern areas of California.)

We reviewed the program files, data bases and found no issues.

7	Was employee listing and completed training accurate and complete? - Progress Report Attachment 7 (A1g)	1	1
	Yes = 1 No = 0 Needs Improvement = .5		

Evaluator Notes:

No issues on training dates and completeness of Attachment 7.

8	Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8 (A1h)	1	1
	Yes = 1 No = 0 Needs Improvement = .5		

Evaluator Notes:

No issues.

9	List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10 (H1-3)	1	1
	Yes = 1 No = 0 Needs Improvement = .5		

Evaluator Notes:

Yes, the accomplishments and anticipated goals for future planned performance were described in detail. No issues.

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

Evaluator Notes:

Loss of points occurred in A.1, A.2 and A.3. Total point loss in Section A is 3 points. Program Manager should check each attachment prior to submitting the information into FedSTAR.

Total points scored for this section: 7
Total possible points for this section: 10

PART B - Program Inspection Procedures

Points(MAX) Score

- | | | | |
|----------|--|---|---|
| 1 | Standard Inspections (B1a)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

Yes, this is covered in the California Public Utilities Commission Gas Pipeline Safety Program General Order 112-E Gas Safety audit and compliance inspections (GO112-E Procedures Manual). See section II, Scheduling Inspections, Part A and Section E, Pre-Inspection Program, last sentence in paragraph, "inspectors should obtain the most current PHMSA inspection forms from PHMSA's website at <http://ops.dot.gov/library/forms/forms.htm>." No issues.

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|----------|---|---|---|
| 2 | IMP Inspections (including DIMP) (B1b)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

This item is mentioned in the California Public Utilities Commission Gas Pipeline Safety Program General Order 112-E Gas Safety audit and compliance inspections (GO112-E Procedures Manual). See section II, Scheduling Inspections, Part A. No issues.

- | | | | |
|----------|---|---|---|
| 3 | OQ Inspections (B1c)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

This item is mentioned in the California Public Utilities Commission Gas Pipeline Safety Program General Order 112-E Gas Safety audit and compliance inspections (GO112-E Procedures Manual). See section II, Scheduling Inspections, Part A. No issues.

- | | | | |
|----------|--|---|---|
| 4 | Damage Prevention Inspections (B1d)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

This item is listed in the California Public Utilities Commission Gas Pipeline Safety Program General Order 112-E Gas Safety audit and compliance inspections (GO112-E Procedures Manual). This item is reviewed during the standard inspection audit using the federal form. No issues.

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|----------|--|---|-----|
| 5 | On-Site Operator Training (B1e)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 0.5 |
|----------|--|---|-----|

Evaluator Notes:

On-Site Operator Training is not covered in the GO112-E Procedures manual for public utilities. However, the procedures are listed in Section 3 of the Mobile Home Park and LPG Operator's Manual. Improvement is needed.

- | | | | |
|----------|---|---|---|
| 6 | Construction Inspections (B1f)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Yes, this is covered in the California Public Utilities Commission Gas Pipeline Safety Program General Order 112-E document and GO112-E Procedures Manual. See II. SCHEDULING AND PREPARING FOR INSPECTIONS A, Scheduling Inspections. No issues.

- | | | | |
|----------|--|---|---|
| 7 | Incident/Accident Investigations (B1g)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

Yes, this is covered in the California Public Utilities Commission Incident Investigation Procedure Manual. No issues.

- | | | | |
|----------|---|---|---|
| 8 | Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? (B2a-d, G1,2,4)
Yes = 6 No = 0 Needs Improvement = 1-5 | 6 | 6 |
|----------|---|---|---|

- a. Length of time since last inspection

Yes ☒ No ☐ Needs Improvement ☐

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

Yes, this is covered in the California Public Utilities Commission Gas Pipeline Safety GO112-E PROCEDURES MANUAL and Mobile Home Procedures Manual section 2. No issues.

9 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Total point loss in Section B is 0.5 points.

B. 5 On-Site Operator Training is not covered in the GO112-E Procedures manual for public utilities. However, the procedures are listed in Section 3 of the Mobile Home Park and LPG Operator's Manual. Improvement is needed. A loss of 0.5 points occurred.

Total points scored for this section: 14.5
Total possible points for this section: 15



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 (A12) 5 0
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):
460.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 12.78 = 2811.78

Ratio: A / B
460.00 / 2811.78 = 0.16

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

Evaluator Notes:

No. A loss of 5 points occurred because CPUC did not meet the required ratio of 0.38. This is the third consecutive year CPUC has failed to meet the minimum recommended number of inspection day requirement. See calculation below on how this was scored.

A = Total Inspection Person Days (Attachment 2) = 460 was found in error. Correct number 459

B = Total Inspection Person Days Charged to the program (220 * Number of Inspection person years, Attachment 7 is 12.78 = 2811.6)

A/B = 459/2811.6 = 0.16325

If the score is less than 0.38 as required, no points are awarded. Therefore the score is 0.

- 2** Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines for requirements) Chapter 4.4 (A8-A11, G19) 5 2
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"/> |

Evaluator Notes:

One engineer did not successfully complete all the required training courses at TQ within the five year time schedule. This individual was listed in the CPUC pipeline safety program base grant progress report Attachment 7 and performed pipeline safety inspections during CY2011. Therefore, three points were deducted.

- 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 (A5) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, Mike Robertson has a good understanding of the federal guidelines for states participating in the pipeline safety program. Additional effort is needed in monitoring and closing carry over or open violations cited by staff members.

- 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 (A6-7) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, Chairman Peevey's response letter was received on February 17, 2012 within the required 60 day time period.

- 5** Did State hold PHMSA TQ Seminar in Past 3 Years? Chapter 8.5 (A3) 2 2
Yes = 2 No = 0

Evaluator Notes:

Yes, two separate seminars were held in 2011. One TQ Seminar was held in the City of Palm Desert with 105 individuals in attendance and the second seminar was held in San Rosa, CA with 115 individuals in attendance. No issues.

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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 (B3)
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 4 |
|----------|---|---|---|

Evaluator Notes:

Needs improvement in meeting the minimum number of inspection requirements that was established in written policy. A review of inspection reports and documentation on the number of inspections performed found less than twenty percent of the total Master Meter Mobile Home Parks were inspected in CY2011. This did not meet the established policy and procedure requirement of twenty percent each year. Therefore, one point was deducted. Public private systems were inspected in accordance with written procedures.

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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 (B4-5)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

They are using CPUC Mobile Home Park Gas/Propane Inspection Report that contains the federal regulations relative to the pipeline safety regulations. No issues were found.

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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 (B7)
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Yes, CPUC staff members use the federal form to cover this item.

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|----------|---|---|---|
| 9 | Did the state review operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance) (NTSB) Chapter 5.1 (B8)
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Yes, CPUC staff members use the federal form to cover this item.

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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 (B9)
Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

Yes, CPUC staff members use the federal form to cover this item.

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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 (B10,E5)
Yes = 1 No = 0 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes, CPUC staff members use the federal form to cover this item. No issues.

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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? Data Initiative (G6-9,G16)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

Yes, CPUC has a data base they use to monitor Mobile Home Park & LP operators on trends and analyzes of the data contained in their annual reports submitted to the agency. A review of the "Natural Gas Safety and Propane Safety Report" released to the public and available on the CPUC web site found information and graphs on the number of services, mains and other relative information on public utility companies is listed. CPUC staff members review annual reports submitted to their agency prior to performing an inspection.

No issues.

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|-----------|--|---|---|
| 13 | Did state input all applicable OQ, IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1 (G10-12) | 2 | 2 |
| | Yes = 2 No = 0 Needs Improvement = 1 | | |

Evaluator Notes:

A review of PHMSA Database on 9-13-12 indicated CPUC staff members have uploaded the OQ results but not the IM report for PG&E that was recently performed. The delayed was due to their investigation of the San Bruno accident. They will be submitting the IM report in the next two months.

No issues.

Program Manager needs to update the list of CPUC users who have access to the PHMSA Database. A review of user names show several individuals that have retired or left CPUC and no longer in the pipeline safety program. This item was mentioned to the Program Manager during this review.

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|-----------|--|---|---|
| 14 | Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission? (G14) | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

Evaluator Notes:

Yes. This is reviewed at meetings and discussion with the operator during the standard or other audits.

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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 (I1-3) | 2 | 2 |
| | Yes = 2 No = 0 Needs Improvement = 1 | | |

Evaluator Notes:

Yes, this is reviewed by the engineer during the audit review performed on each operator. No issue.

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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 (I4-7) | 2 | 2 |
| | Yes = 2 No = 0 Needs Improvement = 1 | | |

Evaluator Notes:

Yes, this is reviewed during the audits. No issues.

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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). 49 CFR 192 Subpart 0 (I8-12) | 2 | 2 |
| | Yes = 2 No = 0 Needs Improvement = 1 | | |

Evaluator Notes:

Yes, this has been accomplished in a two-step process. The first step was completed in 2007. The second phase was completed on SoCal in 2010, Southwest was completed in 2011 and PG&E is being completed in 2012.

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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). 49 CFR 192 Subpart P | Info Only | Info Only |
| | Info Only = No Points | | |

Evaluator Notes:

They are in the process of performing these inspections. They have met with the operators and anticipate performing these types of inspections in 2013. Their goal is to perform a DIMP inspection on all operators before December 31, 2013.

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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. 49 CFR 192.616 (I13-16)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

Yes, they have performed public awareness reviews on their operators verifying the effectiveness of the programs. On November 1-3, 2011 they performed a review on PG&E in accordance with their procedure plan. No issues.

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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). (G20-21)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes, they have a web site that is available to the public on their inspection program. They are in the process of making improvements to the site by adding additional information about their division and including information from their data base on operator trends and damages. No issues.

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|-----------|--|---|---|
| 21 | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 (B6)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

Yes, 11 Safety Related Condition Reports (SRCR) were listed in the CPUC file folders. We compared the SRCR with the information listed in SMART and found the information was corrected and the reports are closed. No issues.

- | | | | |
|-----------|---|---|---|
| 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? (G13)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

A review of a letter from Mike Robertson to Southwest Gas Corporation, Sempra Energy Utilities and PG&E dated September 7, 2011 requesting a response to the Advisory Bulletin on plastic pipe indicates this issue was addressed. No issues.

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|-----------|---|---|---|
| 23 | Did the state participate in/respond to surveys or information requests from NAPS or PHMSA? (H4)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes, CPUC has participated in all surveys and responded to all information about incidents and accidents that have occurred in the State of California. They have developed a threat analysis survey pertaining to what the operators are facing in California and shared the information with NAPS members during the Western Region meeting. The national survey resulted in the identification of 17 potential gas hazards that impact public safety that the CPUC plans to incorporate into its regulatory practices.

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|-----------|--|-----------|-----------|
| 24 | General Comments:
Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

Evaluator Notes:

Number of loss points that occurred in this section is nine as listed below:

C.1 CPUC did not meet the ratio of 0.38 of total inspection person-days to total person days as required. This is the third consecutive year CPUC has failed to meet the minimum recommended number of inspection day requirement. Therefore, five points were deducted.

C.2 One engineer did not successfully complete all the required training courses at TQ within the five year time schedule.

This individual was listed in the CPUC pipeline safety program base grant progress report Attachment 7 and performed pipeline safety inspections during CY2011. Therefore, three points were deducted.

C.6 Needs improvement in meeting the minimum number of inspection requirements that was established in written policy. A review of inspection reports and documentation on the number of inspections performed found less than twenty percent of the total Master Meter Mobile Home Parks were inspected in CY2011. This did not meet the established policy and procedure requirement of twenty percent each year. Therefore, one point was deducted. Public private systems were inspected in accordance with written procedures.

Total points scored for this section: 35
Total possible points for this section: 44



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 (B12-14, B16, B1h)
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"/> |

Evaluator Notes:

A. Yes, this is described in the CPUC Gas Pipeline Safety Program General Order 112-E Procedures Manual. A review of file letters show the company officers were mailed the compliance letters. A list of officials who are being mailed the letters is maintained in CPUC office. We obtained a copy of the document. A review of the Mobile Home Park and Propane Procedures Manual indicate letters are mailed to the company or mobile home park officials. No issues.

B. Yes, this information is described in CPUC Gas Pipeline Safety Program General Order 112-E Procedures Manual and Mobile Home Park & Propane Procedures Manual.

- | | | | |
|--|--|--------------------------------------|--|
| 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 (B11,B18,B19)
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"/> |

Evaluator Notes:

We reviewed thirteen private public utilities and ten mobile home park inspection reports and found violations were cited and corrected action taken and documented correctly. No issues.

- | | | | |
|----------|--|---|---|
| 3 | Did the state issue compliance actions for all probable violations discovered? (B15)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

We reviewed the 404 violations that were cited in 2011 by CPUC and recorded on Attachment 5 of the base grant progress report. We noted 376 violations were cited against master meter mobile home parks, 9 violations were cited against propane operators and 19 violations cited against public utility operators. We reviewed each of the 19 public utility operator's violations, 9 propane violations and 30 of the 376 violations cited against mobile home park operators. This sample selection was taken to insure compliance actions were being taken for each type of inspection performed and CPUC was following their written procedures. No issues were found.

- | | | | |
|----------|--|---|---|
| 4 | Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary. (B17, B20)
Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

We reviewed a random selection of inspection documents and files for calendar year 2011 and verified CPUC was following their compliance actions relative to their procedures manual. We found due process and compliance actions were taken in accordance with their procedures. No issues

- | | | | |
|----------|---|---|---|
| 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) (B27)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

Yes, the program manager is familiar with the CPUC process in issuing civil penalties. In 2011, the CPUC issued a fine of \$38 million against PG&E. They currently have other proposed fines pending before their agency against other operators. CPUC requested and was granted through legislation authority to replace the arbitrary schedules employed by the CPUC to inspect propane and mobile home park master-metered natural gas systems with a risk-based assessment approach. Due to these changes in their state rules and regulations, they will be issuing more potential fines for non-compliance with operators

in calendar year 2013. Other important events, in December, 2011, the CPUC issued Resolution ALJ-274, which delegated greater authority to its gas pipeline inspectors to issue citations to pipeline operators. The Resolution also requires pipeline operators to provide notice to the CPUC of any self-identified violations discovered.

- 6** Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations? (new question) Info Only Info Only
Info Only = No Points

Evaluator Notes:

The fine levied against PG&E in the amount of \$38 million is an excellent demonstration of their compliance authority.

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

Evaluator Notes:

No issues or loss of points occurred in this section.

Total points scored for this section: 14
Total possible points for this section: 14



PART E - Incident Investigations

Points(MAX) Score

- 1 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 (A2,D1-3) 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:

This item is covered in their CPUC Gas Incident Investigation Procedures Manual. A review of incidents reported for calendar year 2011 indicated all reportable incidents and accidents are being reviewed and documentation is retained in their office. The program manager is familiar with Appendix D & E located in the 2011 Guidelines for States Participating in the Pipeline Safety Program. We asked the program manager questions about the agreement between his agency and PHMSA and he understood the agreements. Additionally, he is familiar with the agreements between NTSB & PHMSA and the Federal and State Cooperation agreement. These appendixes and other agreement documents have been provided to all CPUC staff members. No issues.

- 2 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 (D4) 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

We reviewed CPUC Gas Incident Investigation Procedures Manual for incident and accident investigations. We found the procedures listed on pages 7-15 provide direction on what they are to do regarding an on-site investigation. The procedures also contain a description when they would obtain information only but not perform the on-site investigation. This description is located on page 6. No issues.

- 3 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? (D5) 3 3

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

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

Evaluator Notes:

We reviewed the following incident and accident investigation reports and documents. PG&E 4309 Prairie Creek Way, Modesto; Southern California Gas Company 22 Freeway at Bolas Chico Garden, Grove; Southern California Gas Company 10397 Royal Crest Drive, Truckee; Southern California Gas Company, 9816 Houston Ave, Lamont; PG&E 20299 Northwest Square, Cupertino; Southern California Gas Company, 12611 Lacey, Hanford. Comments, observations and contributing factors were recorded in the files and data base. No issues.

- 4 Did the state initiate compliance action for violations found during any incident/accident investigation? (D6) 1 1

Yes = 1 No = 0

Evaluator Notes:

Yes. We reviewed their files and found five incidents that a probable violation was discovered during their incident investigations. CPUC issued violations against the following operators. The following operators were San Diego Gas and Electric March 23, 2011, PG&E July 21, 2011, PG&E September 17, 2011, San Diego Gas and Electric October 28, 2011 and PG&E October 31, 2011. No issues.

- 5 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 (D7) 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, CPUC continues to assist the PHMSA Western Region Office in answering questions and validate information on incident reports. No issues.

- 6 Does state share lessons learned from incidents/accidents? (sharing information, such as: 1 1
at NAPS Region meetings, state seminars, etc) (G15)
Yes = 1 No = 0

Evaluator Notes:

Yes, information continues to be shared at the NAPS Region meetings. Mike Robertson presented a "State Report" on incidents and other relative information to the NASPR members at Flagstaff, AZ, June, 2011.

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

Evaluator Notes:

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

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



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 (E1)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 1 |
|---|---|---|---|

Evaluator Notes:

This item is discussed with the operator during the O&M review but not listed in the inspection form. We suggest an additional question or statement be added to the inspection form to capture wording on the directional drilling procedures. This item will also need to be added to CPUC written Procedures Manual. Needs improvement. Therefore one point reduction occurred.

- | | | | |
|---|--|---|---|
| 2 | Did the state inspector check to assure the pipeline operator is following its written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? (E2)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

CPUC staff members use the federal inspection form and this item is checked during the audit. We monitored this item by reviewing the inspection performed by CPUC on Southern California Company-Chatworth, May 9, 2011 and found this item, 192.614, was checked and reviewed with company officials. No issues.

- | | | | |
|---|---|---|---|
| 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.) (E3)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Yes, this item was in their outreach discussion and presentation to all stakeholders at the Californian Regional Common Ground Alliance (CACGA) meetings. A review of the CACGA meeting minutes on August 9, 2011 indicated this item was discussed. No issues

- | | | | |
|---|--|---|---|
| 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) (E4,G5)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, CPUC rules requires all operators to submit a quarterly report on the number of damages that occur on their system. This information is entered into their database and used as a tool in rank risking their operators for future inspections. No issues.

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

Evaluator Notes:

Loss of one point occurred in this section as listed below:

F.1 This item is discussed with the operator during the O&M review but not listed in the inspection form. We suggest an additional question or statement be added to the inspection form to capture wording on the directional drilling procedures. This item will also need to be added to CPUC written Procedures Manual. Needs improvement. Therefore one point reduction occurred.

Total points scored for this section: 7
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:

Southern California Gas Company

Name of State Inspector(s) Observed:

Jerry Palo, Adriana Crasna and Joel Tran

Location of Inspection:

Anaheim, CA

Date of Inspection:

July 9-13, 2012

Name of PHMSA Representative:

Glynn Blanton, PHMSA State Programs

Evaluator Notes:

The following Southern California Gas Company representatives were present during the office review and field inspection. Jeff Koskie, Pipeline Safety Advisor, Gina Orozco-Mejia, Director Field Services, Steve Gonzalez, Measurement & Regulations, Jorge Aspa, Field Operations Manager and Rene Wheat, Technical Specialist.

- 2 Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? (F2) 1 1
Yes = 1 No = 0

Evaluator Notes:

Yes, California Public Utility Commission (CPUC) branch division notified Southern California Gas Company (SoCalGas) at the beginning of the year (January) about the audit and performed a follow up notice two weeks prior to the inspection.

- 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) (F3) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, Jerry Palo and his other team members, Joel Tran and Adriana Crasna, entered information from the company representatives response to the questions into the Federal Standard Form 2 - Distribution Inspection (Rev 05/06/11 through Amd 192-116).

- 4 Did the inspector thoroughly document results of the inspection? (F4) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, all information was thoroughly documented during the office and field portion of the inspection. This writer noted field notes and photos were being taken as the SoCalGas personnel performed each task in regulator station maintenance, emergency valves, odorization and cathodic protection. Information on items observed was entered into the PHMSA Federal Form 2 document.

- 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.) (F5) 1 1
Yes = 1 No = 0

Evaluator Notes:

Yes, prior to and during the field inspection, this writer observed each inspector checking the company's equipment for calibration date, verification of identification and qualification of each SoCalGas Company employee who performed a task, availability of written procedures on task viewed and asked questions about any abnormal operating conditions that may be found by the employee in the work area.

- 6 Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) (F7) 2 2
Yes = 2 No = 0 Needs Improvement = 1
a. Procedures ☒

- b. Records ☒
- c. Field Activities ☒
- d. Other (please comment) ☐

Evaluator Notes:

Yes, Adriana Crasnena reviewed SoCalGas Company procedures in each of the field task reviews. The task reviewed were regulator & relief valve station maintenance, odorization, cathodic protection and vault maintenance.

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|---|--|---|---|
| 7 | Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) (F8)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, each inspector demonstrated an adequate knowledge of the pipeline safety program responsibilities and understanding of the pipeline safety regulations. Adriana Crasnena, a new CPUC inspector, was previously with the California State Fire Marshal Office and has over 15 years' experience in hazardous liquid pipeline safety work.

- | | | | |
|---|--|---|---|
| 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) (F9)
Yes = 1 No = 0 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

Yes, at the end of the day Jerry Palo and other team members provided information to the SoCalGas Company representatives on areas of concern. The close-out interview was scheduled to be performed on Friday or the following Monday.

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|---|---|---|---|
| 9 | During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable) (F10)
Yes = 1 No = 0 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

Yes, at the end of each day Jerry Palo identified areas of concern and probable violations with company representatives.

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

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

v.	Overpressure Safety Devices	<input checked="" type="checkbox"/>
w.	Plastic Pipe Installation	<input type="checkbox"/>
x.	Public Education	<input type="checkbox"/>
y.	Purging	<input type="checkbox"/>
z.	Prevention of Accidental Ignition	<input type="checkbox"/>
A.	Repairs	<input type="checkbox"/>
B.	Signs	<input checked="" type="checkbox"/>
C.	Tapping	<input type="checkbox"/>
D.	Valve Maintenance	<input checked="" type="checkbox"/>
E.	Vault Maintenance	<input checked="" type="checkbox"/>
F.	Welding	<input type="checkbox"/>
G.	OQ - Operator Qualification	<input checked="" type="checkbox"/>
H.	Compliance Follow-up	<input type="checkbox"/>
I.	Atmospheric Corrosion	<input checked="" type="checkbox"/>
J.	Other	<input checked="" type="checkbox"/>

Evaluator Notes:

Four violations were cited and discussed with company officials at the close of the inspection audit on July 13th. Listed below are the violations cited and evidence collected and observations made by CPUC staff members in determining non-compliance of the pipeline safety regulations. As of August 16, 2012, the official CPUC pipeline safety report has not been released to the company pending approval by Program Manager in the Gas Safety & Reliability Branch and upper management.

49 CFR Section 192.161 (Supports and Anchors) During field observation of the regulator station in Fullerton (Raymer & Gilbert), the saddle supporting the main run was welded directly to the pipe.

49 CFR Section 192.465 (External Corrosion Control: Monitoring) During record review and field observation, CPUC staff found several sections of pipe under the 10% monitoring criteria had low or no readings taken within the required time schedule.

49 CFR Section 192.707 (Line Markers for Mains and Transmission Lines) During field observation, CPUC staff noted that aboveground markers and signs were missing from two of the regulator stations visited in Anaheim (Orangethorpe & Rose) and Fullerton (Raymer & Gilbert). No safety or warning signs were present in the enclosure protecting company equipment.

49 CFR Section 192.805 (Qualification Program) During record review, CPUC staff found William Hitt to be performing pipeline patrol of pipeline 35_6416 on January 5, 2012 in the Anaheim district. The work order number is 520000243821. The individual's qualification was not renewed in 2008; therefore he was not qualified to perform this covered task. During record review, CPUC staff found inconsistency in completing service orders for buried pipeline that is exposed. Southern California Gas formal control document (FCD), 186.02, was reviewed and revised in November 2010 with the condition code replaced from "LR-1" to "L-1." However, the following service orders were completed using the previous condition code designation "LR-1." The following service work orders are listed below:

Number 2063061 (11/30/2012 Rivera)

Number 2053236 (7/25/2011 Hitt)

Number 2043512 (7/01/2011 Baker)

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)? (C1)
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"? (C2)
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? (C3)
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.) (C4)
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? (C5)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

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|----------|---|---|----|
| 6 | Did the state give written notice to PHMSA within 60 days of all probable violations found? (C6)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

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|----------|--|---|----|
| 7 | Did the state initially submit documentation to support compliance action by PHMSA on probable violations? (C7)
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**

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|----------|--|---|----|
| 1 | Did the state use the current federal inspection form(s)? (B21)
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? (B22)
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.) (B23)
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? (B24)
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? (B25)
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? (B26)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

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

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