



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

1200 New Jersey Avenue SE
Washington DC 20590

2014 Gas State Program Evaluation

for

RAILROAD COMMISSION OF TEXAS

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)



2014 Gas State Program Evaluation -- CY 2014

Gas

State Agency: Texas

Rating:

Agency Status:

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

Date of Visit: 03/17/2015 - 06/25/2015

Agency Representative: James Mergist, Program Manager

Jim Osterhaus, Director

Carrie Ebbinghaus, Program Team Lead

Stephanie Weidman, Pipeline Inspector Teal Lead

PHMSA Representative: Don Martin, Michael Thompson and Chris McLaren

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

Name/Title: David Porter, Chairman

Agency: Railroad Commission of Texas

Address: 1701 North Congress Avenue

City/State/Zip: Austin, Texas 78711-2967

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 2014 (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	10
B Program Inspection Procedures	13	10
C Program Performance	46	41.5
D Compliance Activities	15	15
E Incident Investigations	11	9
F Damage Prevention	8	6
G Field Inspections	12	12
H Interstate Agent State (If Applicable)	0	0
I 60106 Agreement State (If Applicable)	0	0
TOTALS	115	103.5
State Rating		90.0

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:

The RRC's database, Pipeline Evaluation System (PES), is utilized to populate data on operators and inspection units. PES is updated/revised when changes occur in operators and/or units. The report from PES at year end 2014 was compared to entries in Attachment 1. There were no discrepancies.

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

Evaluator Notes:

Inspection person days were supported by the inspection database named PES. However, 32 inspection person days were entered for Drug and Alcohol Inspections. The entry should have been number of Drug and Alcohol Inspections. Number of Drug and Alcohol Inspections in the database was four. The Program Manager was requested to amend the Progress Report and resubmit. No points were deducted because the Progress Report scoring would not change as a result of this error.

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

Operator and Inspection Unit information on Attachment 3 were supported by the inspection database named PES. Inspection Unit totals match the totals on Attachment 1. No issues.

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

No issues that would result in a change of Progress Report scoring.

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

Evaluator Notes:

The entries on Attachment 5 are developed from reports generated by the Pipeline Evaluations System (PES). No issues identified with the supporting documentation. The number to be corrected as of Dec. 31 was calculated correctly from the carryover of probable violations from CY2013, probable violations found and those corrected in CY2014.

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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 |
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Evaluator Notes:

All files are kept electronically. The majority of program information resides in the Pipeline Evaluation System. No issues.

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

No issues with employee information.

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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:

No issues with Rules and Amendments.

- 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:

No issues with Attachment 10.

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

Evaluator Notes:

Question A.1 - Inspection person days were supported by the inspection database named PES. However, 32 inspection person days were entered for Drug and Alcohol Inspections. The entry should have been number of Drug and Alcohol Inspections. Number of Drug and Alcohol Inspections in the database was four. The Program Manager was requested to amend the Progress Report and resubmit. No points were deducted because the Progress Report scoring would not change as a result of this error.

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



PART B - Program Inspection Procedures

Points(MAX) Score

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

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Standard inspections are covered in SOP 6B. Units are to be inspected once every four years not to exceed five years.

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|---|--|---|-----|
| 2 | IMP and DIMP Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 0.5 |
|---|--|---|-----|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

There should be more descriptive procedures that outline the follow up or monitoring after program inspection. The RRC should establish procedures that describe its actions to monitor assessments, assessment findings and mitigation actions. 0.5 points were deducted.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

OQ procedures contained in Standard Operations Guide were adequate. No issues.

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|---|---|---|---|
| 4 | Damage Prevention Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|---|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Damage Prevention and Public Awareness are conducted as specialized inspections (non Standard or Comprehensive). A reference to the proper inspection forms should be included in the SOG. No issues resulting in reduction of points.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

On-site operator training was covered in that the frequency was described - on as requested basis. However, the SOG should describe how the training is conducted and what material will be covered. No points deducted.

- | | | | |
|---|--|---|-----|
| 6 | Construction Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 0.5 |
|---|--|---|-----|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The RRC's procedure should be more descriptive on how to determine construction activity within a system being inspected on a Standard Inspection. The procedures do not provide enough direction and description of what should be reviewed during a Construction inspection. 0.5 points were deducted.

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|---|---|---|---|
| 7 | Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? | 6 | 4 |
|---|---|---|---|



Yes = 6 No = 0 Needs Improvement = 1-5

- a. Length of time since last inspection (Within five year interval) Yes No Needs Improvement
- b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) Yes No Needs Improvement
- c. Type of activity being undertaken by operators (i.e. construction) Yes No Needs Improvement
- d. Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc) Yes No Needs Improvement
- 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 No Needs Improvement
- f. Are inspection units broken down appropriately? Yes No Needs Improvement

Evaluator Notes:

The RRC has a process to identify inspection priorities for Standard Inspections. The RRC is working on a process to establish priorities of specialized inspections (OQ, IMP, PA, DIMP, Damage Prevention, etc.). The process utilizes an algorithm to integrate risks. However, the algorithm is not capable of considering all risk factors entered into PES at the present moment. Improvement is needed in order for the algorithm to properly utilize all risk factor data and meet this requirement. Risk factors such as HCA's, pipe size and material, SMYS, leaks on mains and services are examples of factors not being utilized.

There are some inspection units that appear to be large but enough inspection resources are dedicated for the inspections of those units then this should not be an issue.

Two points are deducted.

8 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Question B.2 - There should be more descriptive procedures that outline the follow up or monitoring after program inspection. The RRC should establish procedures that describe its actions to monitor assessments, assessment findings and mitigation actions. 0.5 points were deducted.

Question B.4 - Damage Prevention and Public Awareness are conducted as specialized inspections (non Standard or Comprehensive). A reference to the proper inspection forms should be included in the SOG.

Question B.5 - On-site operator training was covered in that the frequency was described - on as requested basis. However, the SOG should describe how the training is conducted and what material will be covered.

Question B.6 - The RRC's procedure should be more descriptive on how to determine construction activity within a system being inspected on a Standard Inspection. The procedures do not provide enough direction and description of what should be reviewed during a Construction inspection. 0.5 points were deducted.

Question B.7 - The RRC has a process to identify inspection priorities for Standard Inspections. The RRC is working on a process to establish priorities of specialized inspections (OQ, IMP, PA, DIMP, Damage Prevention, etc.). The process utilizes an algorithm to integrate risks. However, the algorithm is not capable of considering all risk factors entered into PES at the present moment. Improvement is needed in order for the algorithm to properly utilize all risk factor data and meet this requirement. Risk factors such as HCA's, pipe size and material, SMYS, leaks on mains and services are examples of factors not being utilized.

There are some inspection units that appear to be large but enough inspection resources are dedicated for the inspections of those units then this should not be an issue.

Two points are deducted.

Total points scored for this section: 10
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):
 4785.00
 B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
 220 X 25.97 = 5712.67
 Ratio: A / B
 4785.00 / 5712.67 = 0.84
 If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0
 Points = 5

Evaluator Notes:
 No issues with inspection person days.

- 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 type="radio"/> | No <input checked="" 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:
 No issues found in meeting the required training requirements that required a reduction in points.
 No outside training of significance was noted.

- 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:
 The Program Manager, James Mergist, was appointed recently. However, Mr. Mergist was the Program Manager for the Louisiana pipeline safety program for many years prior to his retirement and subsequent employment with the RRC. No issues were identified in past evaluations in Louisiana and no issues were found with Mr. Mergist's knowledge during this evaluation.

- 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:
 The RRC Chairman responded to the CY2013 Program Evaluation Letter in 51 days.

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

Evaluator Notes:
 September 2014 was the last seminar. September 2013 was the previous seminar.



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

The RRC conducted 725 inspections of gas operators during CY2014. Of those 725 inspections 65 were reviewed during the evaluation. Of the 65 reviewed 3 did not meet the five year time interval. Resources lost due to turnover and spent in incident investigations were considered. One point is deducted.

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

The RRC utilized PHMSA's forms during CY2014. There were a few Operator Qualification inspection where all portions of the form was not completed as it should be. Any item discussed during the exit interview as needing improvement that does not appear as a violation needs to be noted as such in the inspection form. No issues found significant enough that resulted in reduction of points.

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

The RRC utilizes the PHMSA distribution inspection form when conducting Operation and Maintenance Procedures inspections. The PHMSA form contains this question and is covered by the RRC.

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

The RRC utilizes the PHMSA distribution inspection form when conducting Operation and Maintenance Procedures inspections. The PHMSA form contains this question and is covered by the RRC.

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

The RRC utilizes the PHMSA distribution inspection form when conducting Operation and Maintenance Procedures inspections. The PHMSA form contains this question and is covered by the RRC.

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

192.617 is a line item on the RRC's Form 1 inspection form. Upon a review of randomly selected inspection reports, 192.617 results were documented on the inspection form.

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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 | 1 |
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Evaluator Notes:



The RRC enters data into an electronic file to capture information from the Annual Reports. The information is reviewed for accuracy during the transfer of information or review after entered into the electronic file. The RRC also utilizes the Pipeline Data Mart to obtain Annual Report information. The RRC has not initiated an analysis of data; especially the observation of trends. One point was deducted.

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

No issues significant enough to deduct points.

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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:

RRC's Standard Inspection Form 1 has a question related to information submittal and changes to the NPMS database. Upon a review of randomly selected inspection reports the results of this question were documented on the form.

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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:

The RRC spent 32 inspection person days during CY2014 inspecting Drug and Alcohol requirements. No issues during this evaluation.

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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:

The RRC conducts OQ field requirements (Protocol 9) during Standard Inspections. The RRC spent 39 inspection person days during CY2014 verifying OQ programs. Full OQ program inspections should be conducted once every five years. 39 inspections will not equate to once every five years.

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

The RRC spent 159 inspection person days during CY2014 verifying OQ programs. Full OQ program inspections should be conducted once every five years. 159 inspections will not achieve once every five intervals.

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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 DIMP ? First round of program inspections should be complete by December 2014
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 1 |
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Evaluator Notes:

The RRC has made some progress on the DIMP inspections but did not complete all Dec. 31,2014. One point is deducted.



- 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) PAPEI Effectiveness Inspections should have been completed by December 2013
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

The RRC conducts Public Awareness and Damage Prevention inspections simultaneously. 218 inspection person days were spent in CY2014 on Public Awareness and Damage Prevention inspections. The CY2013 program evaluation found that PAPEI inspections were not completed by December 31, 2013. The PAPEI inspections were not completed by December 31, 2014. One point was deducted.

- 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

Evaluator Notes:

No issues found.

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

Evaluator Notes:

PHMSA's Southwestern Region Office provided feedback that indicated that the RRC could provide more frequent updating but no specific instances were provided. The backlog of Safety Related Conditions Reports needing updates or closure is increasing.

- 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

Evaluator Notes:

The RRC has a requirement that operators report repaired leaks which includes plastic pipe and components. The RRC should develop a reporting requirement that specifically requests to inform the RRC of plastic pipe and/or components that are problematic with defects or leaks. The operators should also report their mitigation actions to address the safety concerns. One half point was deducted.

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

Evaluator Notes:

No known instances where the RRC did not respond.

- 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.(New Question for CY2013, no points until CY2015 evaluation conducted in CY2016)
Info Only = No Points

Evaluator Notes:

Reviewed waivers with the RRC. They will review in detail and respond to PHMSA if the waivers are no longer valid.

- 25 Did the state attend the National NAPSRS Board of Directors Meeting in CY being evaluated? (New Question for CY2014, no points first year)
Info Only = No Points

Evaluator Notes:

No issues.

- 26 Discussion on State Program Performance Metrics found on Stakeholder Communication site. (question will be rolled up and included as part of Question C12 on future evaluations) <http://primis.phmsa.dot.gov/comm/states.htm> 0 0
Info Only = No Points

Evaluator Notes:

The Performance Metrics for Texas on the PRIMIS website were reviewed with the RRC. They were not aware of the web page and were appreciative of the review. The RRC understands that they should identify strategies to improve any metrics that are trending in the wrong direction. The RRC was informed that this question may include points in the future.

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

Evaluator Notes:

Question C.6 - The RRC conducted 725 inspections of gas operators during CY2014. Of those 725 inspections 65 were reviewed during the evaluation. Of the 65 reviewed 3 did not meet the five year time interval. Resources lost due to turnover and spent in incident investigations were considered. One point is deducted.

Question C.7 - The RRC utilized PHMSA's forms during CY2014. There were a few Operator Qualification inspection where all portions of the form was not completed as it should be. Any item discussed during the exit interview as needing improvement that does not appear as a violation needs to be noted as such in the inspection form. No issues found significant enough that resulted in reduction of points.

Question C.12 - The RRC enters data into an electronic file to capture information from the Annual Reports. The information is reviewed for accuracy during the transfer of information or review after entered into the electronic file. The RRC also utilizes the Pipeline Data Mart to obtain Annual Report information. The RRC has not initiated an analysis of data; especially the observation of trends. One half point was deducted.

Question C.16 - The RRC conducts OQ field requirements (Protocol 9) during Standard Inspections. The RRC spent 39 inspection person days during CY2014 verifying OQ programs. Full OQ program inspections should be conducted once every five years. 39 inspections will not equate to once every five years.

Question C.17 The RRC spent 159 inspection person days during CY2014 verifying OQ programs. Full OQ program inspections should be conducted once every five years. 159 inspections will not achieve once every five intervals.

Question C.18 - The RRC has made some progress on the DIMP inspections but did not complete all Dec. 31,2014. One point was deducted.

Question C.19 - The RRC conducts Public Awareness and Damage Prevention inspections simultaneously. 218 inspection person days were spent in CY2014 on Public Awareness and Damage Prevention inspections. The CY2013 program evaluation found that PAPEI inspections were not completed by December 31, 2013. The PAPEI inspections were not completed by December 31, 2014. One point was deducted.

Question C.21 - PHMSA's Southwestern Region Office provided feedback that indicated that the RRC could provide more frequent updating but no specific instances were provided. The backlog of Safety Related Conditions Reports needing updates or closure is increasing.

Question C.22 - The RRC has a requirement that operators report repaired leaks which includes plastic pipe and components. The RRC should develop a reporting requirement that specifically requests operators to inform the RRC of plastic pipe and/or components that are problematic with defects or leaks. The operators should also report their mitigation actions to address the safety concerns. One half point was deducted.

Total points scored for this section: 41.5
Total possible points for this section: 46

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
- a. Procedures to notify an operator (company officer) when a noncompliance is identified Yes No Needs Improvement
- b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns Yes No Needs Improvement

Evaluator Notes:

No issues with procedures detailing steps to resolve probable violations were found.

- 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
- a. Were compliance actions sent to company officer or manager/board member if municipal/government system? Yes No Needs Improvement
- b. Were probable violations documented? Yes No Needs Improvement
- c. Were probable violations resolved? Yes No Needs Improvement
- d. Was the progress of probable violations routinely reviewed? Yes No Needs Improvement

Evaluator Notes:

No issues were identified that were significant enough to deduct points.

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

Evaluator Notes:

No instances were found in the random sampling of inspection reports completed in CY2014.

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

Evaluator Notes:

Due process of compliance actions was not an issue.

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

Evaluator Notes:

The Program Manager was aware and provided a matrix showing considerations matched with civil penalty amounts.

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

Evaluator Notes:

Yes, the RRC has consistently used its fining authority.

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

Evaluator Notes:

The RRC generally complied with the requirements of Part D of this evaluation.



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 1
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

SOG did not have complete procedures describing how decisions will be made to investigate on site or not. No procedures were present to describe what actions will be taken to investigate an incident when not on site. One point was deducted.

- 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:

No substantial 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 1
 Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Based upon a review of all incident investigation files, no issues were found with the means employed to investigate incidents that were not investigated on-site.

- 4** Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? 3 2
 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:

Upon a review of all incident reports none were found to include conclusions or recommendations to avoid future incidents. The RRC utilizes the federal incident investigation form to collect observations and factors but does not go any further. One point is deducted.

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

Evaluator Notes:

No issues found.

- 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:

The PHMSA Region Office provided a list of outstanding incident reports but did not express a concern with the RRC's handling of the reports.



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

Evaluator Notes:

Presentation at 2014 NAPS Region Meeting was provided. The presentation listed incidents. The presentation could go into more detail on lessons learned and may have in the verbal portion of the presentation.

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

Evaluator Notes:

Question A.1 - SOG did not have complete procedures describing how decisions will be made to investigate on site or not. No procedures were present to describe what actions will be taken to investigate an incident when not on site. One point was deducted.

Question E.4 - Upon a review of all incident reports none were found to include conclusions or recommendations to avoid future incidents. The RRC utilizes the federal incident investigation form to collect observations and factors but does not go any further. One point is deducted.

Total points scored for this section: 9
Total possible points for this section: 11



PART F - Damage Prevention

Points(MAX) Score

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

Evaluator Notes:

The RRC's inspection forms used during CY2014 did not include an item to cover this requirement. The RRC has corrected this issue in the forms be utilized during CY2015. Two points were deducted.

- | | | | |
|----------|---|---|---|
| 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, the RRC's inspection forms cover this item when conducting a specialized Damage Prevention inspection.

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

Yes, David Ferguson, the Damage Prevention Manager, attends Damage Prevention Councils, the TQ Seminar and the annual Damage Prevention Summit. He delivers presentations during these meetings of stakeholders.

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

Yes, the RRC keeps data on damages, number of locates and other items. The information is analyzed on a state wide basis. The RRC might identify additional problem solving issues if it would drill deeper into the data to identify problematic areas such as operators, geographic areas, etc.

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

Evaluator Notes:

Question F.1 - The RRC's inspection forms used during CY2014 did not include an item to cover this requirement. The RRC has corrected this issue in the forms be utilized during CY2015. Two points were deducted.

Question F.4 - The RRC might identify additional problem solving issues if it would drill deeper into the data to identify problematic areas such as operators, geographic areas, etc.

Total points scored for this section: 6
Total possible points for this section: 8



1 Operator, Inspector, Location, Date and PHMSA Representative Info OnlyInfo Only
 Info Only = No Points
 Name of Operator Inspected:
 Gas Transmission - CenterPoint Energy Intrastate Pipeline, Inc. (CenterPoint) Gas
 Distribution - Atmos Energy
 Name of State Inspector(s) Observed:
 Gas Transmission - Joey Bass, Lead Inspector, and Brad Cox Gas Distribution - San Sein
 Location of Inspection:
 CenterPoint's operation center in Mineola, TX and Atmos Energy in Carrollton, TX
 Date of Inspection:
 6/2/2015
 Name of PHMSA Representative:
 Gas Transmission - Don Martin Gas Distribution - Michael Thompson

Evaluator Notes:

Harry "Bubba" Vrana, District Operations Manager, for CenterPoint Energy, represented the operator. CenterPoint Energy is the contracted operator of the gas transmission pipeline. The pipeline is owned by Morton International Incorporated. The OPID is 31251.

A Standard Distribution Inspection was conducted on the Atmos Energy system in Carrollton, Texas. This inspection covered the review of records, and field verification on Leak Survey, Cathodic Protection, Valve Maintenance, Regulator Station Maintenance and a Construction (Line relocation project) An O&M Manual review was not conducted at this time. (San Sein) was the inspector representing the Texas Railroad Commission.

The RRC conducted a Standard Inspection during the evaluation observation. The last Standard Inspection on the system was conducted in March, 2008.

The Railroad Commission of Texas (RRC) conducted a Standard (Comprehensive) Inspection of the operator's records and observed operating and testing of pipeline facilities in the field. Operation and Maintenance Procedures were reviewed on only the procedures that were being carried in the field.

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:

Gas Transmission - The operator was notified by the RRC in March, 2015.

Gas Distribution - Yes, the operator was given notice and was prepared for the inspection. Brian Jackson, Compliance Manager for Atmos was lead on the inspection for the operator and had people scheduled for all parts of the inspection or on standby.

3 Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) 2 2
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

The inspectors used RRC Form 1 - Gas Transmission Checklist. RRC Form 1 was developed from PHMSA Form 1. The Operation and Maintenance Procedures were removed from PHMSA Form 1 to develop RRC Form 1. When an Operation and Maintenance inspection is performed, PHMSA Form 1 is utilized. RRC Form 1 appeared to cover all requirements on PHMSA Form 1 (except for Operation and Maintenance Procedures).

Gas Distribution - Yes, The PHMSA Form #2 was used during this inspection. They reviewed field maintenance records, and verified work had been completed.

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



Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Gas Transmission - The inspector completed all portions of the RRC Form 1 and the applicable addendums.

Gas Distribution - Yes, San used a note pad and the electronic inspection form while in the office and copies of the operators maintenance forms while in the field to keep track of his findings.

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:

Gas Transmission - The testing equipment was verified and found to be adequate.

Gas Distribution - Yes, all equipment used in the field was visually inspected and documented by the Texas RRC inspector.

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:

Gas Transmission - The Procedures were reviewed for the field tasks that were conducted during the field portion of the inspection. Cathodic protection test point readings, atmospheric corrosion, overpressure protection, valve operation and line locating.

Gas Distribution - Yes, San took his time to ensure all portions of the inspection were given an adequate review.

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

Evaluator Notes:

Gas Transmission - The lead inspector, Joey Bass, has completed all of the required Training and Qualifications training. Mr. Bass has over eight years experience as a pipeline safety inspector. He was an operator of a gas system prior to his employment with the RRC. Brad Cox has four months of experience and has not taken a TQ class at present.

Gas Distribution - Yes, San showed he knows and understands the state's program and the regulations through his questions and discussions with the operators' representatives during the inspection.

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) 1 1
Yes = 1 No = 0

Evaluator Notes:

Gas Transmission - Yes an interview was conducted.

Gas Distribution - Yes, although the inspection was not complete an interview was conducted on Thursday on all aspects of the inspection which had been conducted to that point. All of the operators' representatives were present.

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

Evaluator Notes:

Gas Transmission - The inspector reviewed the low cathodic protection readings and marker signs with incorrect company information.



Gas Distribution - Yes, even if the operator had addressed the issues during the inspection period, San covered all PV's identified during the inspection to that point.

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

Info Only = No Points

- | | | |
|----|-----------------------------------|-------------------------------------|
| 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 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 checked="" type="checkbox"/> |
| n. | Liaison with Public Officials | <input checked="" type="checkbox"/> |
| o. | Leak Surveys | <input checked="" type="checkbox"/> |
| p. | MOP | <input type="checkbox"/> |
| q. | MAOP | <input checked="" 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 checked="" type="checkbox"/> |
| y. | Purging | <input type="checkbox"/> |
| z. | Prevention of Accidental Ignition | <input checked="" type="checkbox"/> |
| A. | Repairs | <input checked="" type="checkbox"/> |
| B. | Signs | <input checked="" type="checkbox"/> |
| C. | Tapping | <input type="checkbox"/> |
| D. | Valve Maintenance | <input checked="" type="checkbox"/> |
| E. | Vault Maintenance | <input type="checkbox"/> |
| F. | Welding | <input checked="" type="checkbox"/> |
| G. | OQ - Operator Qualification | <input checked="" type="checkbox"/> |
| H. | Compliance Follow-up | <input checked="" type="checkbox"/> |
| I. | Atmospheric Corrosion | <input checked="" type="checkbox"/> |
| J. | Other | <input type="checkbox"/> |

Evaluator Notes:

Gas Transmission - Gas Transmission inspection covered all recordkeeping portions for Operation and Maintenance and field inspection of overpressure protection, cathodic protection. All above ground facility requirements such as markers, signs, atmospheric corrosion, etc. were inspected. The last standard inspection of this operator's facility was completed during 2008.

Gas Distribution - ? Leak Repair follow up: The inspector chose several repair forms that showed small amounts of gas present during the operators repair verifications were conducted to review in the field. The inspector had the operator take several reads with a CGI at each location to verify the repairs had been successful. Reads at one location were found at a

level high enough to require the operator to reassess the leak. They found that the service tee cap had been over tightened and cracked during the original repair.

? Patrolling: The inspector pulled a patrolling record for a bridge crossing in Flower Mound Texas and found that the pipeline had been lifted off of several of its supports by a large tree growing out from under the bridge and not reported on the patrol.

? Cathodic Protection: The inspector pulled locations from CP survey records that showed low reads and visited each site to had new reads taken.

? Odorant Test: The inspector asked to have a couple odorant samples taken in his presence while in the field. Each test was conducted and he noted the reads in his records. (He also wrote the operator up for a PV during one of the Odorant tests when he saw that the large meter at this location was set up off the ground with no support to keep stress off all the connections.)

? New Construction: Although the inspector had not planned to do any new construction during the field portion of his inspection he did ask to stop and look at a job we had driven by while in route to a CP read location. During this stop he requested the OQ records for all contract employees present on the job site to verify they were qualified to perform the tasks they were involved in. He also stayed to witness a couple fusions of the 6 inch plastic being installed and some of the pull back on the bore being completed.

San was very observant and thorough in his field inspection.

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)? 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
The RRC does not have an interstate agreement with PHMSA.

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

Evaluator Notes:
The RRC does not have an interstate agreement with PHMSA.

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

Evaluator Notes:
The RRC does not have an interstate agreement with PHMSA.

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.) 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
The RRC does not have an interstate agreement with PHMSA.

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

Evaluator Notes:
The RRC does not have an interstate agreement with PHMSA.

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

Evaluator Notes:
The RRC does not have an interstate agreement with PHMSA.

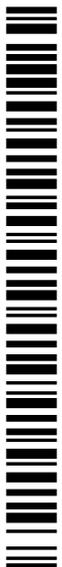
7 Did the state initially submit documentation to support compliance action by PHMSA on probable violations? 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
The RRC does not have an interstate agreement with PHMSA.

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

Evaluator Notes:
The RRC does not have an interstate agreement with PHMSA.

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)? 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
The RRC does not have a Section 60106 agreement with PHMSA.

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

Evaluator Notes:
The RRC does not have a Section 60106 agreement with PHMSA.

3 Were any probable violations identified by state referred to PHMSA for compliance? 1 NA
(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

Evaluator Notes:
The RRC does not have a Section 60106 agreement with PHMSA.

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

Evaluator Notes:
The RRC does not have a Section 60106 agreement with PHMSA.

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

Evaluator Notes:
The RRC does not have a Section 60106 agreement with PHMSA.

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

Evaluator Notes:
The RRC does not have a Section 60106 agreement with PHMSA.

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

Evaluator Notes:
The RRC does not have a Section 60106 agreement with PHMSA.

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

