



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

1200 New Jersey Avenue SE
Washington DC 20590

2017 Gas State Program Evaluation

for

Alabama Public Service Commission

Document Legend

PART:

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



2017 Gas State Program Evaluation -- CY 2017

Gas

State Agency: Alabama

Agency Status:

Date of Visit: 04/23/2018 - 05/11/2018

Agency Representative: Wallace Jones - Director, Gas Pipeline Safety Division

PHMSA Representative: Glynn Blanton, US DOT/PHMSA State Evaluator

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

Name/Title: Twinkle Andress Cavanaugh, President

Agency: Alabama Public Service Commission

Address: 100 N. Union St., Suite 800

City/State/Zip: Montgomery, Alabama 36104

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 2017 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. A deficiency in any one part of a multiple part question should be scored as needs improvement. Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual progress report attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART G):

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

Scoring Summary

PARTS

Possible Points Points Scored

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

10	8.5
13	13
48	42
15	15
4	4
8	8
12	12
0	0
0	0

TOTALS

110 102.5

State Rating

93.2

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:

A review of Attachment 1 - Stats on Operators found the information correct and all inspection units except for one new Municipal system was inspected in CY2017. Additionally, one gathering line inspection unit was added to the document from previous year.

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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:

A review of records and files found information on Attachment 2- State Inspection Activity was correct. The number of inspections performed in CY2017 (1019.5) was more than in CY2016 (942.5). No issues of concern were found in this review.

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

Evaluator Notes:

A reviewed of Attachment 3 - List of Operators found the information correct. Information on name changes to several systems was provided in the note section of attachment. No areas of concerns were found.

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

Evaluator Notes:

No incidents/accidents occurred in CY2017.

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

Evaluator Notes:

Reviewed and verified violations found, corrected and carry over for calendar year 2017. A larger number of carry overs (122) was listed from previous year. It was suggested an in-depth review of all carry over violations be checked and scheduled to be cleared in CY2018. The number of compliance actions taken against the operators was incorrectly reported as zero. The correct number is forty-two and Program Manager has corrected this information via e-mail to Carrie Winslow on April 25th. Improvement is needed in correctly reporting this data. Therefore, a loss of half point occurred.

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

Evaluator Notes:

Yes, inspection reports, letters, forms and other pipeline safety information was accessible in the file room and on the main server I drive. All forms used by inspectors are listed in Appendix C in the Pipeline Safety Procedure Manual. No areas of concern.

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

Evaluator Notes:

A review of SABA and information from Program Manager via email to Don Martin on April 2, 2018 determined one inspector was incorrectly listed as a category III. The correct category is II because the individual has completed all core

courses, has three years of experience with AL PSC and several years experience with the natural gas industry. Therefore, a loss of one point occurred.

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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 |
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Evaluator Notes:

Information listed in Attachment 8 is correct. Civil penalties amount of \$200,000 per day up to \$2 M for a related series of violations is the same amount as PHMSA.

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

A review of Attachment 10 confirm planned performance goals and accomplishments were completed. Information was concise and provided the reader an excellent description of the programs goals and objectives.

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

Evaluator Notes:

A loss of points occurred in this section of the review. See questions A. 5 & A. 7 for more information.

Total points scored for this section: 8.5
Total possible points for this section: 10



PART B - Program Inspection Procedures

Points(MAX) Score

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

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

A review of Alabama Pipeline Safety Program Operations Plan dated March 6, 2018 found this item listed on pages 12-15, Section V. Conducting Inspections: Sub-Sections A-G.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A review of Alabama Pipeline Safety Program Operations Plan dated March 6, 2018 found this item listed on pages 18-19, Section V. Conducting Inspections: Sub-Sections N & P.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A review of Alabama Pipeline Safety Program Operations Plan dated March 6, 2018 found this item listed on page 17, Section I. Training and Operator Qualification.

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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:

A review of Alabama Pipeline Safety Program Operations Plan dated March 6, 2018 found this item listed on pages 18, Section M, Damage Prevention Activities.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A review of Alabama Pipeline Safety Program Operations Plan dated March 6, 2018 found this item listed on pages 18, Operator Training. Information listed does not match PHMSA Guidelines and this item was discussed with Program Manager. It was agreed to update this information in future revisions of the procedures.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A review of Alabama Pipeline Safety Program Operations Plan dated March 6, 2018 found this item listed on pages 15-17, Section V, Subsection H. They use their state form for all construction. The operator is required to file a construction notification to the agency prior to construction work being performed.

- 7 Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? 6 6
Yes = 6 No = 0 Needs Improvement = 1-5
- a. Length of time since last inspection (Within five year interval) Yes ☒ 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:

A review of Alabama Pipeline Safety Program Operations Plan dated March 6, 2018 found these items listed in Appendix D, Risk Management Assessments. The elements of risk were listed separately and ranked on pages 34-35. No issues of concern.

8 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: 13
Total possible points for this section: 13



PART C - Program Performance

Points(MAX) Score

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

A. Total Inspection Person Days (Attachment 2):
1019.50

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
 $220 \times 7.93 = 1744.97$

Ratio: A / B
 $1019.50 / 1744.97 = 0.58$

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

Evaluator Notes:

A.Total Inspection Person Days (Attachment 2)= 1019.5

B.Total Inspection Person Days Charged to the program($220 \times$ Number of Inspection personyears(Attachment 7)=1744.96652

Formula:- Ratio = A/B = $1019.5/1744.96652 = 0.58$

Rule:- (If Ratio ≥ 0.38 then points = 5 else Points = 0.)

Thus Points = 5

- 2 Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines Appendix C for requirements) Chapter 4.4 5 5
Yes = 5 No = 0 Needs Improvement = 1-4

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|---|--------------------------------------|--------------------------|---|
| a. Completion of Required OQ Training before conducting inspection as lead? | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. Completion of Required DIMP*/IMP Training before conducting inspection as lead? *Effective Evaluation CY2013 | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. Root Cause Training by at least one inspector/program manager | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. Note any outside training completed | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector. | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

a. Yes, nine inspectors which includes the Program Manager have completed all required gas courses and meet the gas inspector training requirements. One newly hired inspector is scheduled to attend TQ courses in CY2018.

b. Yes, eight inspectors which includes the Program Manager have completed all required DIMP/IMP training courses.

c. Yes, three inspectors which includes the Program Manager have completed the root cause course.

d. Yes, several inspectors have HAZWOPER Certifications.

e. Yes, a review of SABA confirm 9 of the 10 inspectors are qualified to perform a standard inspection as the lead.

- 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:

Yes, Wallace Jones has a good understanding of the requirements of the pipeline safety program and completed all TQ courses within three years of employment. He has over forty years of natural gas experience and been a Program Manager for ten years.

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

Evaluator Notes:

Yes, Chairman Cavanaugh response letter to Zach Barrett was sent on February 8, 2018 and within the required 60-day time frame. However, a review and verification of the items corrected in the letter, Operator Qualification and Distribution Integrity Management Program Inspections, were found not completed. Therefore, improvement is needed to insure information provided is correct. A loss of one point occurred.

- 5 Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5 1 1
Yes = 1 No = 0

Evaluator Notes:

Yes, AL PSC conducts an annual seminar each year. The last seminar was held in Montgomery, AL on December 5-7, 2017. Number of attendees was three hundred and fifty operators.

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

Evaluator Notes:

No, conducted a review of files and inspection reports and found all operator types and inspection units were not inspected in accordance to written procedures. A review found seven OQ and two DIMP inspections that were more than sixty days pass the five year cycle, scheduled for CY2017, not completed. These inspections were also listed in the previous 2016 state program evaluation. Due to the inspections not being completed within 60 days of established time schedule a loss of five points occurred.

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

Evaluator Notes:

Yes, AL PSC uses the federal and state inspection forms to cover all applicable code section. The Alabama Gas Field Evaluation Report is used for two years and then they use PHMSA ? Standard Inspection Report of a Gas Distribution Operator form. A review of files and inspections found all portions of the forms were completed with a check mark or comment beside each question.

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

Evaluator Notes:

Yes, this item is reviewed and checked on the Alabama Gas Field Evaluation Report /PHMSA ? Standard Inspection Report of a Gas Distribution Operator forms.

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

Evaluator Notes:

Yes, a review of files found this item is reviewed on the Alabama Gas Field Evaluation Report /PHMSA ? Standard Inspection Report of a Gas Distribution Operator forms.

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

Evaluator Notes:

Yes, a review of files found this item is reviewed on the Alabama Gas Field Evaluation Report /PHMSA ? Standard Inspection Report of a Gas Distribution Operator forms.

- 11 Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 192.617? Chapter 5.1 1 1

Yes = 1 No = 0

Evaluator Notes:

Yes, this item is reviewed and covered on the Alabama Gas Field Evaluation Report /PHMSA, Standard Inspection Report of a Gas Distribution Operator forms.

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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? | 2 | 2 |
|-----------|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, operator's annual reports are reviewed by Program Manager and data that is found incorrect is corrected by the operator. After corrections are made the annual report information is entered into a rank risk spreadsheet maintained by the Administrative Assistant that is used to determine inspection audits.

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| 13 | Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission? | 1 | 1 |
|-----------|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, this item is checked on the Alabama Gas Field Evaluation Report, question 4 or on the Federal Standard Inspection form located on page 3. A review of Southeast Gas inspection report dated October 2, 2017 found this item was checked. No areas of concern.

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| 14 | 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 | 2 | 2 |
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Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, the AL PSC reviews the operator's drug & alcohol program along with the test required by the regulations during the Gas Field Evaluation Inspection. An additional checklist is used to check the positive tests requirements. In 2017, AL PSC conducted 102 drug and alcohol inspections.

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| 15 | 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 | 2 | 2 |
|-----------|---|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, a review of files found OQ programs have been inspected on each operator. AL PSC uses the federal form Protocol 9 to check and verify the programs. A total of thirty seven inspections were performed in CY2017.

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| 16 | Is state verifying operator's gas transmission integrity management programs (IMP) are up to date? This should include a previous review of IMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review should take in to account program review and updates of operators plan(s). (Are the State's largest operators programs being contacted or reviewed annually? Are replies to Operator IM notifications addressed? (formerly part of Question C-13)). 49 CFR 192 Subpart 0 | 2 | 2 |
|-----------|---|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, AL PSC is verifying the gas transmission integrity program using the Alabama Gas Field Evaluation Inspection form. A review of IMP plan, along with test and action taken by the operator are discussed and reviewed when completing questions 36 & 37 in the form. Yes, the state's largest operator's program is reviewed annually. A check of files found Alabama Gas Corporation (Spire) was inspected in November 2017.

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| 17 | Is state verifying operator's gas distribution integrity management Programs (DIMP)? This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). (Are the State's largest operators programs being contacted or reviewed annually?). 49 CFR 192 Subpart P | 2 | 2 |
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Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, AL PSC is verifying the gas distribution integrity program using the Alabama Gas Field Evaluation Inspection form. A review of DIMP plan, along with test and action taken by the operator are discussed and reviewed when completing questions 36 & 37 in the form. Yes, four of the state's largest operator's program are reviewed annually. A review of files confirms this information. No areas of concern.

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| 18 | Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. PAPEI Effectiveness Inspections should be conducted every four years by operators. 49 CFR 192.616 | 2 | 2 |
|-----------|---|---|---|
- Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. Ten PAPEI inspections identified in the 2016 state program evaluation as not being performed were completed in CY2017. A verification of the inspection reports by reviewing office files confirmed the inspection were completed by December 31, 2017. A second cycle of PAPEI will be begin in CY2018.

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| 19 | 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). | 1 | 1 |
|-----------|---|---|---|
- Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, this is achieved by attending meetings with Alabama Natural Gas Association and Commission's website.

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| 20 | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 | 1 | NA |
|-----------|--|---|----|
- Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No safety related condition reports were issued in CY2017.

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- | | | | |
|-----------|--|---|---|
| 21 | 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? | 1 | 1 |
|-----------|--|---|---|
- Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, this item is described and listed on the Alabama Gas Field Evaluation form question 33. A review of files found this item was checked by the inspector during their field inspections.

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| 22 | Did the state participate in/respond to surveys or information requests from NAPSRS or PHMSA? | 1 | 1 |
|-----------|---|---|---|
- Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, a review of emails from Robert Clarillos to Wallace Jones confirmed participation in surveys from NAPSRS and PHMSA did occurred in CY2017.

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- | | | | |
|-----------|---|---|---|
| 23 | 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. | 1 | 1 |
|-----------|---|---|---|
- No = 0 Needs Improvement = .5 Yes = 1

Evaluator Notes:

Yes. The active waiver issued in 2009 to Alabama Gas Corp for un-odorized gas to be delivered to Hunt Oil Corp continues to be monitored. The waiver issued in 2015 to Exxon-Mobil pertaining to installation of new reinforced thermoplastic pipe (RTP) is also being monitored by AL PSC during their normal inspection audits.

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|-----------|--|---|---|
| 24 | Did the state attend the National NAPSRS Board of Directors Meeting in CY being evaluated? | 1 | 1 |
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No = 0 Needs Improvement = .5 Yes = 1

Evaluator Notes:

Yes, Wallace Jones, Judy Ramsey and Greg Meadows attended the NAPS Board of Directors Meeting in Columbus, OH on September 25-29, 2017.

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|--|---|--------------------------------------|--|
| 25 | Discussion on State Program Performance Metrics found on Stakeholder Communication site - http://primis.phmsa.dot.gov/comm/states.htm
No = 0 Needs Improvement = 1 Yes = 2 | 2 | 2 |
| a. Discussion of Potential Accelerated Actions (AA's) based on any negative trends | | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. NTSB P-11-20 Meaningful Metrics | | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

a & b. Reviewed with Program Manager the number of damages per 1,000 tickets listed on the annual reports along with other action pertaining to AA on cast iron replacement programs. In CY2017 a downward trend on damages occurred resulting in the number of damages per 1000 locates to a lower number 3.176. Total number of locate requests were up to 567,499 with enforcement action on damages being taken by the Attorney General office. The AG has prosecuted one gas operator and several cable companies. The number of excavation leaks is showing a downward trend due to the cast iron replacement program initiatives. The number of inspection days is trending upward due to having a fully staff of inspectors.

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| 26 | Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT) Has the State updated SICT data?
No = 0 Yes = 1 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

A discussion on the number of inspection days assigned to each operator listed in the gas program appears to be correct according to the program manager. The only change that may need to be made would be in the hazardous liquid program.

When the SICT program is available in CY2018, the program manager will be making changes to HL Program.

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| 27 | Did the State verify Operators took appropriate action regarding Pipeline Flow Reversals, Product Changes and Conversions to Service? See ADP-2014-04
Needs Improvement = .5 No = 0 Yes = 1 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

They are not aware of any pipeline flow reversals, product changes, or conversion to service in the state but will be adding this questions to their state/federal inspection forms.

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|-----------|--|-----------|-----------|
| 28 | General Comments:
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

A loss of points occurred on questions C.4 & C.6.

Total points scored for this section: 42
Total possible points for this section: 48

PART D - Compliance Activities

Points(MAX) Score

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

Evaluator Notes:

- a. This information is listed in Alabama Public Service Commission procedure manual in Section S. Notices of Probable Violations pages 19-20.
- b. This information is listed under section U. Notice of Probable Violation Tracking, pages 21-22
- c. This information is listed under section V. Removal or Correction of a Probable Violation, pages 22-23

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|----------|--|---|---|
| 2 | Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| a. | Were compliance actions sent to company officer or manager/board member if municipal/government system? | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Document probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Resolve probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. | Routinely review progress of probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e. | Within 30 days, conduct a post-inspection briefing with the owner or operator of the gas or hazardous liquid pipeline facility inspected outlining any concerns; and | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f. | Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

- a. Yes, reviewed files and inspection reports and found letters were being sent to the company officer of the private companies, mayor/ superintendent of municipality systems and director/manager of housing authorities. A review of contact names of the individuals on the operator's list was current as of March 19, 2018.
- b. Yes, a review of files found fifty-one operators that were cited for Notice of Probable Violations. Reviewed inspection reports and found violations were documented correctly.
- c. Yes, violations were resolved by a follow-up inspection or additional information being filed by the operator to the agency.
- d. Yes, Program Manager/Administrative Assistant review on a quarterly schedule all violations. Information about the status of the information is sent to the affected inspector to perform a follow-up inspection.
- e. An exit interview is conducted immediately after the inspection with the operator. Information about areas of concerns or potential violations are shared with the operator's representatives. This item is described in AL PSC Procedures manual on page 17.
- f. All Notice of Probable Violations letters are provided to the operator about their findings within 90 days of the date of the inspection.

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

Evaluator Notes:

Yes, a review of files and inspection reports found forty-two NOPV's were issued in CY2017.

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

Evaluator Notes:

Yes, no show cause hearings were necessary due to the operators agreeing to correct the violations. Additionally, AL PSC

rules allow the operator an opportunity to argue their position as to whether a probable violation occurred or request a "show cause" hearing before a presiding officer or the commission.

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

Evaluator Notes:

Yes, the program manager is familiar with imposing civil penalties and assessed a civil penalty against a master metered operator four years ago. Additionally, on page 21 of AL PSC procedure manual it identifies a criteria to use in determining the level of fine.

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

Evaluator Notes:

Yes, a civil penalty was assessed against a Air Base Inn, a master metered operator in CY 20017.

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

Evaluator Notes:

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

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



PART E - Incident Investigations

Points(MAX) Score

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

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, a review of Alabama Pipeline Safety Program Operations Plan dated March 6, 2018 found this item listed on pages 24-28, VI. Investigation of Incidents.

- 2 Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? And did state keep adequate records of Incident/Accident notifications received? Chapter 6 2 2

Yes = 2 No = 0 Needs Improvement = 1

- a. Acknowledgement of MOU between NTSB and PHMSA (Appendix D) Yes ☒ No ☐ Needs Improvement ☐
- b. Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E) Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

Yes, according to Alabama PSC's GPS Rule #9, the pipeline operator is required to give telephonic notice of all incidents by calling (334) 242-5778 to report incidents during normal business hours of 8:00 AM to 5:00 PM. After hours, the operator is required to call the Pipeline Safety Investigator assigned to or located in the operator's region of the state (North, Central or South Alabama). Yes, AL PSC is maintaining adequate records of all notifications received. No reportable incidents occurred in CY2017.

a & b. Yes, program manager is familiar with Appendix D & E and included the documents in AL PSC procedure manual.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No incidents occurred in CY2017.

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

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

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

Evaluator Notes:

No incidents occurred in CY2017.

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

Yes = 1 No = 0

Evaluator Notes:

No incidents occurred in CY2017.

- 6 Did the state assist Region Office or Accident Investigation Division (AID) 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 NA

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No incidents occurred in CY2017.

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

Evaluator Notes:

No incidents occurred in CY2017.

- 8 General Comments:

Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

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

Total points scored for this section: 4
Total possible points for this section: 4



PART F - Damage Prevention

Points(MAX) Score

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

Evaluator Notes:

Yes, this is reviewed during an onsite construction inspection with the operator and construction supervisor. It is also checked during the standard inspection of the operator's O & M Plan. This item is check on the construction inspection checklist form. This is item 30 on the form.

- | | | | |
|---|--|---|---|
| 2 | Did the state inspector verify pipeline operators are following their 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, this is check on the construction inspection checklist form. This is item 31 on the form.

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

Program Manger continues to participates in the Alabama Damage Prevention Alliance, Alabama Damage Prevention Summit, support the 811 promulgation signed by Governor, and used the one call grant to support the 811 April safe digging month.

- | | | | |
|---|--|---|---|
| 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 program manager collects the data and evaluates the trends on the number of pipeline damages per 1,000 locate request each year. This information is presented at the NAPSRS Southern region meeting and other information meetings in discussing damage prevention.

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

Evaluator Notes:

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

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

PART G - Field Inspections

Points(MAX) Score

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

Name of Operator Inspected:

Trussville Utilities Board

Name of State Inspector(s) Observed:

Asia Skillman & Jamar Robinson, Pipeline Safety Engineers

Location of Inspection:

Trussville, Alabama

Date of Inspection:

May 7,9 & 10, 2018

Name of PHMSA Representative:

Glynn Blanton, State Liaison

Evaluator Notes:

This was a standard inspection of the natural gas distribution system located in Trussville, Alabama. The following company individuals were present, Mike Strength, General Manager, Brian King, Bryan Smith, Chief Engineer, Danny Roper, David Clements & Eric Merrill. During the inspection the drug & alcohol program and public awareness programs were reviewed.

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

Evaluator Notes:

Yes, Greg Meadows, Pipeline Safety Investigations Supervisor, notified Trussville Utilities Board General Manager Mike Strengths in February, 2018 of the scheduled inspection audit.

- 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:

Yes, Asia Skillman & Jamar Robinson were using the APSC forms, Gas Field Evaluation Report and Drug Program Checklist.

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

Evaluator Notes:

Yes, Asia Skillman & Jamar Robinson were observed writing down information from the operator's representatives on answers to questions asked.

- 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:

Yes, the operator provided a copy of their operation and maintenance manual, drug testing results, valve and regulator maintenance, cathodic protection readings, Public Awareness Plan and its effectiveness.

- 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:

Yes, an in-depth review of records, forms, and procedures of Trussville Utility Board was performed.

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

Evaluator Notes:

Yes, Asia Skillman & Jamar Robinson have completed all mandatory training for a Gas Standard Inspector and have four years of experience in pipeline safety 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)
Yes = 1 No = 0 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

Yes, Asia Skillman & Jamar Robinson conducted the exit interview immediately after the field portion of the inspection was completed with Trussville Utilities Board officials.

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

Evaluator Notes:

Yes, one violation, 192.465 (d), was cited for failure to maintain cathodic protection on the distribution system during this inspection. Asia Skillman also mentioned the following items as areas of concern or improvement:

- 1) Operator needs to establish controls for correcting cathodic protection deficiencies promptly.
- 2) Operator needs to ensure signs are on all regulator station fences and remove vegetation.
- 3) Operator needs to develop repair work order for broken gauge ports on regulator stations.
- 4) Operator needs to consider removing dead tree over Valleybrook Regulator Station.
- 5) Operator should consider more in-depth cross training for regulator station maintenance personnel.

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

- | | | |
|----|-------------------------------|-------------------------------------|
| a. | Abandonment | <input type="checkbox"/> |
| b. | Abnormal Operations | <input 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 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 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 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 type="checkbox"/> |
| F. | Welding | <input type="checkbox"/> |
| G. | OQ - Operator Qualification | <input type="checkbox"/> |
| H. | Compliance Follow-up | <input type="checkbox"/> |
| I. | Atmospheric Corrosion | <input type="checkbox"/> |
| J. | Other | <input type="checkbox"/> |

Evaluator Notes:

This field portion of the inspection was a critical valve and regulator station inspection. Each of the two inspectors did an excellent job in reviewing the crew members operator qualification identifications, AOC's, tools and records of the items checked. Inspectors checked the company's pressure testing devices, gauges and tools used to perform lock-up and popping the relief valve. They recorded all pipe-to soil potential readings as they were taken and observed the overpressure test results on the regulator stations.

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



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

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

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

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

Evaluator Notes:

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

Evaluator Notes:

- | | | | |
|----------|--|---|----|
| 3 | Were any probable violations identified by state referred to PHMSA for compliance?
(NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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