



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

MARYLAND 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:** Maryland

**Agency Status:**

**Date of Visit:** 06/25/2018 - 07/13/2018

**Agency Representative:** John J. Clementson, Assistant Chief Engineer

**Rating:**

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

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

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

**Name/Title:** Jason M. Stanek, Chairman

**Agency:** Maryland Public Service Commission

**Address:** 6 St. Paul Street, 19th Floor

**City/State/Zip:** Baltimore, Maryland 21202-6806

## 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	10	10
B Program Inspection Procedures	13	13
C Program Performance	48	48
D Compliance Activities	15	15
E Incident Investigations	5	5
F Damage Prevention	8	8
G Field Inspections	12	12
H Interstate Agent State (If Applicable)	0	0
I 60106 Agreement State (If Applicable)	0	0

### TOTALS

**111 111**

**State Rating ..... 100.0**

# 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<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

A review of Attachment 1 found the number of operators inspected was less than in previous year. Unit inspected was 75.6% compared to last year's 92.6%. All information contained in the attachment was found correct.

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

Evaluator Notes:

A review of inspection days of each activity listed in Attachment 2 found the data to be correct. Total number of inspections performed were 523.5 and more than fifty percent was in design, testing and construction.

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

Evaluator Notes:

Attachment 3 was checked with the list of operators and other information on file in the MD PSC office and found correct.

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

Evaluator Notes:

No incidents/accidents occurred or reported in CY2017.

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

Evaluator Notes:

A comprehensive review of Attachment 5 found the number of carryovers,34 continues to be less than in previous years. Action is being taken to clear all violations found and carry overs violations within one year from the date they were cited.

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

Evaluator Notes:

Yes program files and records located in MD PSC office were well-organized and accessible.

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

Evaluator Notes:

A review of Attachment 7 and TQ records indicate all inspectors except Kobby Anyinam have completed training to meet the Gas Inspector requirements. Mr. Anyinam needs to complete PL3242 Welding & Welding Inspection of Pipeline Material course. Additionally, Kobby Anyinam & Negussie Tesfaye need to complete PL-1245 Safety Evaluation of Distribution Integrity Management Programs to meet the DIMP Training requirements.

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

Evaluator Notes:

MD PSC has automatic adoption of federal rules and regulations. MD PSC civil penalty amounts are the same as PHMSA.

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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:

A good description of planned and past program performance were listed along with DPAP information. No issues of concern with the information.

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

Evaluator Notes:

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

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



## PART B - Program Inspection Procedures

Points(MAX) Score

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

Yes = 2 No = 0 Needs Improvement = 1

**Evaluator Notes:**

Yes, this information is listed in MD PSC Pipeline Safety Program Procedure Plan for Inspection, Enforcement and Incident (Procedures) dated May 1, 2018. Inspection and post-inspection are listed under V. Conducting Inspections, Section E, Record Inspection, page 10.

- |   |  |   |   |
|---|--|---|---|
| 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:**

Yes, IMP & DIMP inspection procedures for pre-inspection, inspection and post-inspection are listed under V. Conducting Inspections, Section O, Distribution Integrity Management Programs, page 17 of MD PSC Procedures.

- |   |  |   |   |
|---|--|---|---|
| 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:**

Yes, OQ inspection procedures for pre-inspection, inspection and post-inspection are listed under V. Conducting Inspections, H. Training and Operator Qualification (OQ) Inspections, page 16.

- |   |   |   |   |
|---|---|---|---|
| 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:**

Yes, Damage Prevention procedures for pre-inspection, inspection and post-inspection are listed under V. Conducting Inspections, L. Damage Prevention Activities, page 16.

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

Yes = 1 No = 0 Needs Improvement = .5

**Evaluator Notes:**

Yes, operator training is listed in the written Procedures under V. Conducting Inspections, Section K. Operator Training on page 16.

- |   |  |   |   |
|---|--|---|---|
| 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:**

Yes, Construction inspection procedures for pre-inspection, inspection and post-inspection are listed under V. Conducting Inspections, Section G. Design, Testing and Construction Inspection, page 13.

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

**Evaluator Notes:**

Inspection Priorities are listed under IV. Inspection Planning, Section B. Inspection Priority, pages 8-9 of the written procedures. Each of the elements above were listed and used in establishing inspections. Additionally, a review of office records and files indicate all inspections units are broken down correctly. No areas 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):  
523.50
- B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
220 X 5.37 = 1181.03
- Ratio: A / B  
523.50 / 1181.03 = 0.44
- If Ratio  $\geq$  0.38 Then Points = 5, If Ratio  $<$  0.38 Then Points = 0  
Points = 5

**Evaluator Notes:**

A.Total Inspection Person Days (Attachment 2)= 523.5  
B.Total Inspection Person Days Charged to the program(220\*Number of Inspection person years(Attachment 7)=1181.03326  
Formula:- Ratio = A/B = 523.5/1181.03326 = 0.44  
Rule:- (If Ratio  $\geq$  .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
- a. Completion of Required OQ Training before conducting inspection as lead? Yes ☒ No ☐ Needs Improvement ☐
- b. Completion of Required DIMP\*/IMP Training before conducting inspection as lead? \*Effective Evaluation CY2013 Yes ☒ No ☐ Needs Improvement ☐
- c. Root Cause Training by at least one inspector/program manager Yes ☒ No ☐ Needs Improvement ☐
- d. Note any outside training completed Yes ☒ No ☐ Needs Improvement ☐
- e. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector. Yes ☒ No ☐ Needs Improvement ☐

**Evaluator Notes:**

A review of TQ records indicate all inspectors except Kobby Anyinam have completed training to meet the Gas Inspector requirements. Mr. Anyinam needs to complete PL3242 Welding & Welding Inspection of Pipeline Material course. All inspectors except Kobby Anyinam & Negussie Tesfaye who need to complete PL-1245 Safety Evaluation of Distribution Integrity Management Programs meet the required DIMP Training requirements. John Clementson, Carlos Acosta, R.K. Amroliwala & Adesina Jaiyeola have completed the Root Cause training. All but inspector Kobby Anyinam are qualified to perform and lead a standard inspection. Two inspectors attended the Appalachian Underground Corrosion Short Course in West Virginia during CY2017.

- 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, John Clementson has completed all training courses for Gas & Hazardous Liquid Inspector training requirements and has over twenty-one years experience in pipeline safety inspection work.

- 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:**

Yes, Chairman Hughes' response letter to Zach Barrett was received on September 13, 2018 and within the required 60 day time requirement.

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

Evaluator Notes:

The last seminar held was in CY2016 at Linthicum Heights, MD. The three days seminar was attended by operators from distribution, master meter and LPG systems. Total number of attendees from LDC was 88 and Master Meter 25.

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

Evaluator Notes:

An in-depth review of all inspections was conducted to determine if they were performed on the time intervals established in MD PSC procedures. The review found operators are being inspected within the established time schedule listed in Appendix D. No areas of concern.

- |          |  |   |   |
|----------|--|---|---|
| <b>7</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

Yes, they are using the Federal and State forms in performing inspections of operators. They are also using the IA system and forms.

- |          |   |   |   |
|----------|---|---|---|
| <b>8</b> | 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<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Yes, this item is reviewed and discussion with the operator in the MD PSC Form EN # 17, Gas Utility O&M Plan Comp Review form.

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|----------|--|---|---|
| <b>9</b> | 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<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Yes, these item pertaining to cracking, leakage and other unusual operating maintenance conditions are address in MD PSC Form EN # 17, Gas Utility O&M Plan Comp Review.

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|-----------|---|---|---|
| <b>10</b> | 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<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes, Form EN # 17, Gas Utility O&M Plan Comp Review, is used to monitor the operator's action in monitoring leaks caused by excavation damage near building and determine if the operator's procedures address multiple leaks and underground migration of gas into nearby building.

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|-----------|--|---|---|
| <b>11</b> | 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<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

MD PSC is using Form 54, Failure Investigation, to review and monitor this item.



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

Evaluator Notes:

Yes, the program manager reviews all operator's annual reports and records data entered into a spreadsheet that is used in the rank risking of operators to be inspected. Also, the data is reviewed for trends in the number of services, mains and leaks by material. Inspector's also review the annual report with the operator during their inspection to insure the information is correct.

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|-----------|---|---|---|
| <b>13</b> | Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission?<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes, MD PSC send out a Specific Information Request (SIR) the second quarter of each year to each of the three intrastate transmission operators asking for verification of data submitted into the NPMS. A review of the letters confirm this action was completed in CY2017.

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|-----------|---|---|---|
| <b>14</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

Yes, MD PSC Form EN # 10, Drug & Alcohol, is used to verify the operator is conducting drug and alcohol tests. The form includes information on verifying positive tests are responded to in accordance to 49 CFR 199.

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|-----------|---|---|---|
| <b>15</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

Yes, they use the Federal Program IA to verify this information.

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|-----------|---|---|---|
| <b>16</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

Yes, MD PSC uses the Federal Program IA to verify this information. Additionally, the Specific Information Request (SIR) is used to contact the three largest operators requesting updates to their plans.

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|-----------|--|---|---|
| <b>17</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|

Evaluator Notes:

Yes, MD PSC uses the Federal Program IA to verify this information. Additionally, the Specific Information Request (SIR) is used to contact the larger operators requesting updates to their plans.

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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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----|---|---|---|

Evaluator Notes:

Yes, MD PSC uses the federal form to monitor the operator's public awareness program. The effectiveness of the program is reviewed during the inspection.

- |    |  |   |   |
|----|--|---|---|
| 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).<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----|--|---|---|

Evaluator Notes:

Yes, MD PSC staff members meet with operators on a quarterly schedule at the Gas Operator Advisory Committee meetings. They discuss issues pertaining to damage prevention or enforcement action for non-compliance. The last meeting in CY2017 was December 21, 2017.

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

Evaluator Notes:

N/A No safety related condition reports in CY2017.

- |    |   |   |   |
|----|---|---|---|
| 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?<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----|---|---|---|

Evaluator Notes:

Yes, this item is reviewed at the Gas Operator Advisory Committee meetings each year.

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

Evaluator Notes:

Yes, John Clementson responded to thirteen NAPSRS monkey surveys in CY 2017.

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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.<br>No = 0 Needs Improvement = .5 Yes = 1 | 1 | 1 |
|----|--|---|---|

Evaluator Notes:

No waivers/special permits issued in CY2017. Currently, there are three remaining waivers that are active.

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

Evaluator Notes:

Yes, John Clementson, Program Manager, attended the NAPSRS Board of Directors Meeting in Columbus, Ohio.

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|----|---|---|---|
| 25 | Discussion on State Program Performance Metrics found on Stakeholder Communication site - <a href="http://primis.phmsa.dot.gov/comm/states.htm">http://primis.phmsa.dot.gov/comm/states.htm</a><br>No = 0 Needs Improvement = 1 Yes = 2 | 2 | 2 |
|----|---|---|---|

- a. Discussion of Potential Accelerated Actions (AA's) based on any negative trends    Yes ☒    No ☐    Needs Improvement ☐

b. NTSB P-11-20 Meaningful Metrics

Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

MD PSC continues to track leaks and causes for both services and mains. The information is annually recorded. CY2017 data results show leakage on mains were trending upward in the areas of corrosion, natural force damage and excavation damage. Additionally, leakage on services was contributing to natural force and excavation damages. Overall, leakage on mains are trending upward versus service lines trending downward. MD PSC will continue to monitoring these trends during their review of the operator's records during the field inspection.

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

Evaluator Notes:

Reviewed and discussion with John Clementson the current data entered into the SIDCT program. Information entered reflects the time cycle for the type of inspection and operator they inspect in accordance to Appendix D of their procedures. A few minor changes were made to the SIDCT program this year due to the lost of three master meter operators. These changes will have no effect to the results of the number of days to be inspected. John anticipate the current numbers entered in the SIDCT will not change in CY2018

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

Evaluator Notes:

Reviewed this information with John Clementson. This item is not applicable to the three intra transmission operators in the State of Maryland.

- |           |  |           |           |
|-----------|--|-----------|-----------|
| <b>28</b> | General Comments:<br>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: 48  
Total possible points for this section: 48



## PART D - Compliance Activities

Points(MAX) Score

- |          |  |                                      |  |
|----------|--|--------------------------------------|--|
| <b>1</b> | Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1<br>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. Yes, this is listed in Section V. CONDUCTING INSPECTIONS, Subsection P. Notice of Probable Violations (NOPV) and/or Warning Letters (WARN) of MD PSC INSPECTION, ENFORCEMENT AND INCIDENT INVESTIGATION PROCEDURES.
- b. Yes, this is described in Section R. Notice of Probable Violation Tracking.
- c. Yes, this information is described in Section S. Closure of a Probable Violation

- |          |  |                                      |  |
|----------|--|--------------------------------------|--|
| <b>2</b> | 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<br>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 thirty-eight compliance actions letters and randomly selected ten to confirm letter was sent to company officer. All were sent to President or V-President.
- b. Yes, program manager has a spreadsheet that he reviews monthly on probable violations.
- c. Yes, probable violations are being resolved in a timely manner. In this regard, most are cleared within 30 days of receipt of the compliance letter to the operator.
- d. Yes, routinely reviewed monthly by program manager.
- e. Inspection reports and letters pertaining to areas of concern are completed by the inspector(s) one week after the inspection
- (s). The documents are reviewed by the program manager and mailed to the officer of the company within ten days.
- f. The operator receives within 45 days after the inspection the letter of concern or probable violation from the MD PSC.

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

### Evaluator Notes:

Yes, thirty-eight compliance actions were taken in CY2017 against operators for non-compliance with the pipeline safety regulations.

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

### Evaluator Notes:

Yes, MD PSC has written procedures to allow the operator due process including a request for a show cause hearing. In each of the compliance letter there is four options available to the operator:

1. Agree to the proposed compliance order;

2. Request the execution of a consent order;
3. Object to the proposed compliance order and submit written explanation, information or other material to the allegations in the notice;
4. Request a hearing under 3-102(c), Public Utility Companies Article.

---

<b>5</b>	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:

Yes, Program Manager is familiar with imposing civil penalties, In CY2017 three civil penalties were assessed against three operators: Annapolis Housing Authority in the amount of \$1,000, Kendal Apartments in the amount of \$1,000 and Washington Gas Company in the amount of \$2,500.

---

<b>6</b>	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, MD PSC has clearly demonstrated the agency's enforcement authority by issuing fines in CY2017 and prior years. No areas of concern in demonstrating this item.

---

<b>7</b>	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: 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, procedures pertaining to incident/accident investigation are listed in MD PSC written procedures, Section VI. Investigation of Incidents, page 20.

- 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, the state has a mechanism to receive calls from operators and respond to all incidents after hours as described in the written procedures document section VI. Yes, MD PSC maintains records of all incidents/accidents notifications received.

a. & b. Yes, Program Manager and Engineers are familiar with the MOU's between NTSB and PHMSA. This item is reference in their written procedures, section D. Incident Investigation Process and Scope.

- 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:

Yes, if an onsite investigation was not made they have in their written procedures under Section VI, a statement, "a memo to the Incident File will be created documenting the reason(s) that an on-site investigation was not conducted."

- 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:

NA. No incidents occurred in CY2017 that required an investigation, report or conclusions of facts.

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

Evaluator Notes:

NA. No accidents/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:

N/A. No incidents/accidents occurred in CY2017.

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

Evaluator Notes:

N/A. No incidents/accidents occurred in CY2017.

---

- 8 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

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

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Total points scored for this section: 5  
Total possible points for this section: 5



## 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, this item is reviewed with operator's who have directional drilling procedures in-house by staff members. This question is also listed on the Natural Gas Operator Comprehensive O&M Evaluation form, number EN17.

- |   |  |   |   |
|---|--|---|---|
| 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?<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, this item and question is listed on the MD PSC construction activity form EN33-34 and comprehensive form EN17. The inspector is required to check and verify the locate request ticket number on all construction projects.

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

Evaluator Notes:

Yes, a Specific Information Request (SIR) was sent to each of its operators requesting information on how the company's damage prevention program complied with CGA Best Practices. The results were reviewed and found the companies are utilizing the CGA Damage Prevention Best Practices. Going forward, MD PSC has added this question to the Natural Gas Operator Comprehensive O&M Review form EN17 and will be reviewing during their inspections.

- |   |  |   |   |
|---|--|---|---|
| 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)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, program manager collects data on the number of damages reported by the operator on the Specific Information Request form. In combination with the SIR and annual report submitted by the operator, the program manager determines trends on the damages per 1,000 locate request. The average damages per 1,000 locate request is 1.13 for CY2017.

- |   |  |           |           |
|---|--|-----------|-----------|
| 5 | General Comments:<br>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

- |          |  |                    |
|----------|--|--------------------|
| <b>1</b> | Operator, Inspector, Location, Date and PHMSA Representative | Info OnlyInfo Only |
|          | Info Only = No Points  |                    |

Name of Operator Inspected:

Columbia Gas Company of Maryland, Washington Gas Company & AC&T Company

Name of State Inspector(s) Observed:

Carlos Acosta; Adesina Jaiyeola; John Clementson

Location of Inspection:

South Cumberland, Frederick, Hagerstown, MD

Date of Inspection:

July 9-11

Name of PHMSA Representative:

Glynn Blanton, State Program Evaluator

Evaluator Notes:

Reviewed inspections of the following operators;

Columbia Gas Company of Maryland - regulation station and overpressure protection inspection record & field review.

Washington Gas Company - review of fabrication of new steel regulator station and installation of 2" PE 2413 pipeline in East Rising Street

AC&T Company (LPG system) - comprehensive inspection

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | 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, each of the three operators were notified two weeks prior to the inspection visits by email or phone call from each inspector.

- |          |   |   |   |
|----------|---|---|---|
| <b>3</b> | 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, each inspector used MD PSC inspection form relative to the type of inspection being performed.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Did the inspector thoroughly document results of the inspection? | 2 | 2 |
|          | Yes = 2 No = 0 Needs Improvement = 1                             |   |   |

Evaluator Notes:

Yes, this observer noted Mr. Carlos Acosta taking notes on the type of regulator, size, serial number and operating pressure of the working and monitoring regulators. Mr. Acosta asked questions and recorded responses to each question.

Mr. Adesina Jaiyeola asked questions and obtained information from each crew member on their qualifications. He was observed reviewing and obtaining clarification on the components being installed at the new regulator station and pipeline construction site.

- |          |  |   |   |
|----------|--|---|---|
| <b>5</b> | 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, both inspectors were observed checking the operator's equipment, personnel identifications and qualifications prior to reviewing the construction sites.

- |          |  |   |   |
|----------|--|---|---|
| <b>6</b> | 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:

Columbia Gas of Maryland written procedures and records were reviewed prior to observing one regulator station being checked for lock-up and over pressurization protection.  
Washington Gas Company construction plans for the newly fabricated steel regulator station was reviewed in the field prior to conducting the inspection.

A comprehensive inspection using MD PSC form 64 was used to performed the inspection on AC&T facilities. All maintenance records and procedures were reviewed along with a field inspection.

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

Evaluator Notes:

Yes, Carlos Acosta and Adesina Jaiyeola have completed all TQ courses and meet the Gas Inspector Training requirements,

- |   |   |   |   |
|---|---|---|---|
| 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)<br>Yes = 1 No = 0 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

Yes, each inspectors conducted an exit interview with each company representative at the end of the inspection.

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

Evaluator Notes:

No probable violations were found.

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

- a. Abandonment ☐
- b. Abnormal Operations ☐
- c. Break-Out Tanks ☐
- d. Compressor or Pump Stations ☐
- e. Change in Class Location ☐
- f. Casings ☐
- g. Cathodic Protection ☐
- h. Cast-iron Replacement ☐
- i. Damage Prevention ☐
- j. Deactivation ☐
- k. Emergency Procedures ☐
- l. Inspection of Right-of-Way ☐
- m. Line Markers ☐
- n. Liaison with Public Officials ☐
- o. Leak Surveys ☐
- p. MOP ☒

- |    |                                   |                                     |
|----|-----------------------------------|-------------------------------------|
| q. | MAOP                              | <input checked="" type="checkbox"/> |
| r. | Moving Pipe                       | <input type="checkbox"/>            |
| s. | New Construction                  | <input checked="" type="checkbox"/> |
| t. | Navigable Waterway Crossings      | <input type="checkbox"/>            |
| u. | Odorization                       | <input type="checkbox"/>            |
| v. | Overpressure Safety Devices       | <input type="checkbox"/>            |
| w. | Plastic Pipe Installation         | <input checked="" type="checkbox"/> |
| x. | Public Education                  | <input type="checkbox"/>            |
| y. | Purging                           | <input type="checkbox"/>            |
| z. | Prevention of Accidental Ignition | <input type="checkbox"/>            |
| A. | Repairs                           | <input type="checkbox"/>            |
| B. | Signs                             | <input type="checkbox"/>            |
| C. | Tapping                           | <input type="checkbox"/>            |
| D. | Valve Maintenance                 | <input checked="" type="checkbox"/> |
| E. | Vault Maintenance                 | <input type="checkbox"/>            |
| F. | Welding                           | <input checked="" 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:

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



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

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

- |          |   |   |    |
|----------|---|---|----|
| <b>4</b> | 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.)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>8</b> | General Comments:<br>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**

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>7</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

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