



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

MISSOURI 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:** Missouri

**Agency Status:**

**Date of Visit:** 04/16/2018 - 04/20/2018

**Agency Representative:** Kathleen McNelis

Pipeline Safety Program Manager

**PHMSA Representative:** Clint Stephens

State Evaluator

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

**Name/Title:** Mr. Daniel Y. Hall, Chairman

**Agency:** Missouri Public Service Commission

**Address:** 200 Madison Street, Suite 900

**City/State/Zip:** Jefferson City, Missouri 65101

**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	10	10
B	Program Inspection Procedures	13	13
C	Program Performance	49	49
D	Compliance Activities	15	14
E	Incident Investigations	11	11
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
<b>TOTALS</b>		<b>118</b>	<b>117</b>
<b>State Rating</b>	.....		<b>99.2</b>

## 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:

There were no issues with accuracy of data in Attachment 1 of Progress Report.

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

Evaluator Notes:

Reviewed inspection days' spreadsheet for comparison with data in Attachment 2 of Progress Report. Data seems accurate in Attachment 2.

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

There were no issues with accuracy of data in Attachment 3 of Progress Report.

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

Incidents listed in Attachment 4 of Progress Report match data in Pipeline Data Mart (PDM).

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

Evaluator Notes:

There were no issues with accuracy of data in Attachment 5 of Progress Report.

- |   |   |   |   |
|---|---|---|---|
| 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. Pipeline Program files were well-organized and stored both in paper form and electronically.

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

Yes. Employee listing and completed training seemed accurate and complete in Attachment 7 of Progress Report.

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

No issues with information in Attachment 8 of Progress Report.

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

The MoPSC continued program of replacing/retiring Aldyl A, bare steel, and cast iron pipe in 2017 per information in Attachment 10 of Progress Report. There was 80 miles of cast iron main replaced from 2016 to the end of 2017. There was 87 miles of bare steel main replaced in 2016 to the end of 2017. The MoPSC's excavation damage prevention law was deemed adequate by PHMSA's evaluation.

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**10** General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

No issues were identified in Part A of evaluation of State Program.

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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:

Pre-Inspection procedures for all inspection types are included in Section 5.2 including standard inspections. The inspection activities for standard inspection is included in Section 5.5.2. Post inspection Activities for all types of inspections is included in Section 5.6 of the Missouri Pipeline Safety Program Plan.

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

Pre-Inspection procedures for all inspection types are included in Section 5.2 including IMP and DIMP inspections. The inspection activities for DIMP inspections is included in Section 5.5.6. and for IMP in Section 5.5.7. Post inspection Activities for all types of inspections is included in Section 5.6 of the Missouri Pipeline Safety Program Plan.

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

Pre-Inspection procedures for all inspection types are included in Section 5.2 including OQ inspections. The inspection activities for OQ inspections is included in Section 5.5.5. Post inspection Activities for all types of inspections is included in Section 5.6 of the Missouri Pipeline Safety Program Plan.

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

Pre-Inspection procedures for all inspection types are included in Section 5.2 including standard inspections (includes damage prevention). The inspection activities for standard inspection is included in Section 5.5.2. Post inspection Activities for all types of inspections is included in Section 5.6 of the Missouri Pipeline Safety Program Plan.

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

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

Pre-Inspection procedures for all inspection types are included in Section 5.2 including on-site operating training. The inspection activities for on-site operator training is included in Section 5.5.14. Post inspection Activities for all types of inspections is included in Section 5.6 of the Missouri Pipeline Safety Program Plan.

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

Pre-Inspection procedures for all inspection types are included in Section 5.2 including construction inspections. The inspection activities for construction inspections is included in Section 5.5.12. Post inspection Activities for all types of inspections is included in Section 5.6 of the Missouri Pipeline Safety Program Plan.

- |          |   |                                      |  |
|----------|---|--------------------------------------|--|
| <b>7</b> | 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:

The Missouri Pipeline Safety Program Plan addresses inspection priorities in section 4.2. No issues.

**8** General Comments:

Info Only = No Points

Info Only Info Only

Evaluator Notes:

No issues were identified in Part B of evaluation of State Program.

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):  
735.60

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
220 X 7.70 = 1694.00

Ratio: A / B  
735.60 / 1694.00 = 0.43

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

### Evaluator Notes:

Ratio of Total Inspection person days meets requirement  $\geq$ .38. Ratio = A/B = 735.6/ (220 x 7.70) = 735.6/1694 = .43. No issues.

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

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

### Evaluator Notes:

- Seven MoPSC inspectors have completed the OQ training.
- Daniel Fitzpatrick, Foster Clinton, John Kottwitz, Kathleen McNelis, Evan Neuner, and Gregory Williams completed Root Cause course.
- John Kottwitz, Kathleen McNelis completed IM course.
- Daniel Fitzpatrick, Gregory Williams, and Kathleen McNellis have taken NACE training. Gregory Williams has training through the National Association of Fire Investigators (NAFI).

- 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. State Pipeline Safety Program Manager showed adequate knowledge of PHMSA program and regulations.

- 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. Chair letter was sent on October 4, 2017 and response was received on October 30, 2017.

- 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. The MoPSC participated in the MANGO Natural Gas Operations Seminar and Trade Fair on June 28-30, 2017. They are scheduled in 2018 for the T&Q seminar.

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

Yes. The MoPSC inspected all types of operators and inspection units in accordance with time intervals established in the written procedures.

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

Evaluator Notes:

Yes. Inspection forms covered all applicable code requirements and all portions of inspection forms were completed.

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

Evaluator Notes:

Yes. The procedure question is included in the O&M inspection form and the standard inspection form.

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

Yes. The procedure question is included in the O&M inspection form and Emergency Procedures Inspection Checklist (12) (H).

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

Yes. The procedure question is included in the O&M inspection form and Emergency Procedures Inspection Checklist (12) (J).

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

Evaluator Notes:

Yes. The procedure question is included in the O&M inspection form and Emergency Procedures Inspection Checklist (12) (L). Leak response procedures are spelled out in 4 CSR 240-40.030(14) which are part of the O&M and Emergency Procedures Inspection checklist.

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

Evaluator Notes:

Yes. The MoPSC has a checklist for reviewing operator annual reports (distribution and transmission pipelines) accuracy and for analyzing that data for trends and operator issues. This data is used for evaluating operator issues prior to DIMP and TIMP inspections.

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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. The MoPSC has correspondence with operators verifying information has been submitted into the NPMS database with changes, if required.

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

D&A question is included in the MoPSC standard inspection checklist and documented as such.

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

The MoPSC completed OQ inspections Protocols 1-8 on all operators from 2016, and completed in July 2017. The OQ questions are included in the standard inspection checklist

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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:

The MoPSC performed three comprehensive TIMP inspections in 2017 (Liberty Utilities, Summit Natural Gas, and Missouri Gas Energy). There is a total of six transmission operators with HCAs. The large operators are contacted annually to inquire about integrity digs, construction, etc.

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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:

There were 25 DIMP inspections performed in 2017. This completed DIMP inspections for all operators that were required within the 5-year timeframe.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>18</b> | 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:

The MoPSC verifies operators Public Awareness programs are up to date during standard inspections. There was 27 Public Awareness Program inspection performed in 2017 based on a 5-year interval.

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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. There is a "all operators" letter which was sent out six times in 2017 outlining any pipeline regulatory changes, annual reporting, etc. Communicating with stakeholders through the MoPSC website and the three MANGO meetings per year. Gas Cases are available to the public through EFIS (Electronic Filing and Information System).

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

Evaluator Notes:

There were no SRC Reports in 2017.

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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:

The MoPSC has one operator with Aldyl A polyethylene pipe (City Utilities of Springfield). They are required to replace 6 miles of pipe annually. They must submit a progress report semi-annually to the MoPSC. Presently, approximately 47.3 miles of pre-1985 high pressure plastic pipe has been replaced, with approximately 28.15 miles remaining. Also, there are some operators replacing PVC pipe which has found to be unlocatable due to no tracer wire being installed with pipe.

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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. The State responded to surveys and information requests from NAPSRS and PHMSA in 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. 1 1  
No = 0 Needs Improvement = .5 Yes = 1

Evaluator Notes:

There were two waivers the MoPSC had in affect in 2017. One waiver from CY2000 pertains to re-qualification of persons for electrofusion and mechanical joining procedures. This waiver is being monitored during standard inspections. The second waiver was rescinded in 2017 pertaining to City of Kennett, Missouri performing a leak survey and cathodic survey annually on a yard line. This waiver had been in effect since July 22, 2003.

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

Evaluator Notes:

Yes. The MoPSC attended the National NAPSRS Board of Directors Meeting in 2017 in Dublin, OH.

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

- a. Discussion of Potential Accelerated Actions (AA's) based on any negative trends Yes ☒ No ☐ Needs Improvement ☐  
b. NTSB P-11-20 Meaningful Metrics Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

State Program Performance Metric was discussed with MoPSC and the following items were provided:

- Damage Prevention Program performance metrics indicates slight decrease in excavation damages per 1,000 tickets from 2014-2016.
- Inspection Activity performance metrics indicates increase of inspection days per 1,000 miles of gas pipeline from 2015-2016.
- Leak Management performance metrics indicates leaks repaired, hazardous leaks and leaks outstanding all decreased from 2015 to 2016.

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<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? No = 0 Yes = 1	1	1
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Evaluator Notes:

The MoPSC submitted into the State Inspection Day Calculation Tool (SICT) was 441 as of December 27, 2017, and verified in PDM on April 17, 2018.

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<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 Needs Improvement = .5 No = 0 Yes = 1	1	1
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Evaluator Notes:

Yes. The MoPSC has specific State guidelines, along with the federal regulations that are required when you have a conversion of service.

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<b>28</b>	General Comments: Info Only = No Points	Info Only	Info Only
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Evaluator Notes:

No issues were identified in Part C of evaluation of State Program.

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Total points scored for this section: 49  
Total possible points for this section: 49



**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 | <b>4</b>  | <b>4</b>                                |
| 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:**

Yes. The procedures for notifying a company officer when non-compliance is identified in Section 2.5.5. The procedure to routinely review progress of compliance actions to prevent delays is in Section 5.6.1, Item #5. The procedure for closing outstanding probable violation is in 5.6.2, 5.6.3, and 5.6.4.

- |          |  |   |   |
|----------|--|---|---|
| <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 | <b>4</b>  | <b>4</b>                                |
| 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:**

Yes. The MoPSC followed compliance procedures from discovery to resolution and adequately documented all probable violations based on the inspection reports reviewed during the State evaluation.

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

**Evaluator Notes:**

Yes. The MoPSC issued compliance actions for all probable violations identified during inspections.

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

**Evaluator Notes:**

Yes. The compliance actions gave reasonable due process to all parties. There were no "show cause" hearing warranted based on the compliance actions.

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

**Evaluator Notes:**

Yes. The program manager is familiar with the state process for imposing civil penalties. There were no civil penalties for repeat violations.

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

Evaluator Notes:

The MoPSC cannot demonstrate it is using their enforcement fining authority for pipeline safety violations.

---

7 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

There was one issue identified in Part D of State evaluation; the MoPSC cannot demonstrate it is using their enforcement fining authority for pipeline safety violations.

---

Total points scored for this section: 14  
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?<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Yes. The procedure to address State actions in the event of an incident/accident is in Section 6 of the Missouri Pipeline Safety Program Plan.

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

- |    |  |                                      |                          |   |
|----|--|--------------------------------------|--------------------------|---|
| a. | Acknowledgement of MOU between NTSB and PHMSA (Appendix D)                             | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

Yes. The procedure that provides adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports is in Section 6 of Missouri Pipeline Safety Program Plan (Plan). Reference to NTSB is in Section 6.1.3 of Plan.

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

Evaluator Notes:

There two reportable incidents in 2017 that the MoPSC did not perform an on-site investigation; however, the State did obtain sufficient information from the operator that warranted a compliance action for both incidents. The incident investigation is still open and the MoPSC staff is expected to have a conference call with the operator on April 30, 2018. A DIMP inspection is scheduled on August 6-9, 2018.

- |   |   |   |   |
|---|---|---|---|
| 4 | Were all incidents investigated, thoroughly documented, and with conclusions and recommendations?<br>Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
|---|---|---|---|

- |    |   |                                      |                          |   |
|----|---|--------------------------------------|--------------------------|---|
| a. | Observations and document review                        | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Contributing Factors                                    | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Recommendations to prevent recurrences when appropriate | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

Yes. The two reportable incidents that were investigated in 2017 were thoroughly documented, with conclusions and recommendations.

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

Evaluator Notes:

Yes. The MoPSC did initiate compliance action for violations found during the incident investigation in 2017.

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

Evaluator Notes:

Yes. The MoPSC provided updates to (AID) following both incidents that occurred in 2017. The MoPSC staff could provide accurate information (AID) as soon as it was provided from the operator.

---

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

Evaluator Notes:

Information is shared during the NAPS regional meeting.

---

8 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

No issues were identified in Part E of evaluation of State Program.

---

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



## PART F - Damage Prevention

Points(MAX) Score

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

Evaluator Notes:

Yes. The information is included in the MoPSC O&M and Emergency Procedures inspection checklist in Part (12) (I).

- |   |  |   |   |
|---|--|---|---|
| 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. The information is included in the MoPSC Standard inspection checklist in Part (12) (I) and Missouri State Rule 4 CSR 240-40.030(12) (I)2.

- |   |  |   |   |
|---|--|---|---|
| 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. The MoPSC staff attended the MO CGA excavation summit in Springfield, MO in December 2017. The MoPSC Chairman currently has radio advertisement for 811. Missouri Damage Prevention program has been deemed adequate by PHMSA based on the 9 elements.

- |   |  |   |   |
|---|--|---|---|
| 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. The MoPSC evaluates each operator's trends during DIMP and TIMP inspections by preparing graphs with data from the annual reports from 2010 to 2017.

- |   |  |           |           |
|---|--|-----------|-----------|
| 5 | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

No issues were identified in Part F of evaluation of State Program.

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:

City of Bernie Municipal System

Name of State Inspector(s) Observed:

Greg Williams (lead inspector), Aaron Archer

Location of Inspection:

Bernie, Missouri

Date of Inspection:

May 29-May 31, 2018

Name of PHMSA Representative:

Leonard Steiner

Evaluator Notes:

A standard records, DIMP inspection procedures and records, OQ records, Emergency Response procedures, and Drug Testing Program were conducted.

- 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:

Adequate notification was provided. The operator had staff and records available.

- 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:

Missouri has their inspection form. The form has the required questions, compared to the PHMSA inspection form.

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

Evaluator Notes:

Yes, each question had the results recorded.

- 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:

All equipment was available to conduct any tasks that reviewing or verifying of completion.

- 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             | <input checked="" type="checkbox"/> |
| b. Records                | <input checked="" type="checkbox"/> |
| c. Field Activities       | <input checked="" type="checkbox"/> |
| d. Other (please comment) | <input type="checkbox"/>            |

Evaluator Notes:

Only procedures were inspected if there may be an inconsistency with the records. All records were from random selection of records. Selected field locations were inspected.

- |   |   |   |   |
|---|---|---|---|
| 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, both inspectors were knowledgeable of safety program required to comply with the pipeline safety regulations.

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

Mr. Williams reviewed the previous inspection probable violations and the corrections completed.

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

Yes, Probable violations were identified and discussed the correction of these probable violations. Area of concern, or areas that may need more emphasis. Each probable violation or area of concern, will be addressed in the followup letter.

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

- |    |                             |                                     |
|----|-----------------------------|-------------------------------------|
| D. | Valve Maintenance           | <input checked="" type="checkbox"/> |
| E. | Vault Maintenance           | <input type="checkbox"/>            |
| F. | Welding                     | <input checked="" type="checkbox"/> |
| G. | OQ - Operator Qualification | <input checked="" type="checkbox"/> |
| H. | Compliance Follow-up        | <input type="checkbox"/>            |
| I. | Atmospheric Corrosion       | <input checked="" type="checkbox"/> |
| J. | Other                       | <input type="checkbox"/>            |

Evaluator Notes:

From May 29 through May 31, I observed Greg Williams, lead inspector, and Aaron Archer, conducting an inspection of the Municipal System of Bernie, Missouri. I started the evaluation during the afternoon of May 29, after the start of their inspection. Adequate notice was provided, with the operator's representatives fully prepared with access of records and procedures. An adequate check list was used and the results were recorded as provided by the operator or from evaluation of the records. The inspectors were knowledgeable of the pipeline safety regulations and were competent in determining if actions and procedures were in compliance of pipeline safety regulations. The inspection was conducted in a courteous and professional manner.

---

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:

The MoPSC is not an interstate agent.

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

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

- |          |  |   |    |
|----------|--|---|----|
| <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:

The MoPSC does not have a Section 60106 agreement with PHMSA.

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