



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

NEW JERSEY BOARD OF PUBLIC UTILITIES

### 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:** New Jersey

**Agency Status:**

**Date of Visit:** 07/23/2018 - 07/27/2018

**Agency Representative:** Mike Stonack, PE Bureau Chief, Pipeline Safety  
Jim Giuliano, Director of Reliability & Security  
Juan Urena, Environmental Engineer 2  
John Staudenmayer, Environmental Engineer 1  
Andre Moses, Environmental Engineer

**Rating:**

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

**PHMSA Representative:** Glynn Blanton, PHMSA State Programs

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

**Name/Title:** Joseph L. Fiordaliso, President

**Agency:** New Jersey Board of Public Utilities

**Address:** 44 South Clinton Avenue, 3rd Floor, Suite 314, PO Box 350

**City/State/Zip:** Trenton, New Jersey 08625-0350

## 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

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)

### Possible Points Points Scored

10	9
13	13
48	48
15	15
11	11
8	8
12	12
0	0
0	0
<b>117</b>	<b>116</b>

### TOTALS

**State Rating** ..... **99.1**

## PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | 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 and comparison of 2016 & 2017 Attachment 1 found two less master meter operators. The names of the master meter operators eliminated were provided in Attachment 3. Total number of units inspected was less than in CY2016.

Colonial Pines, LLC was eliminated as a Master Meter facility in CY2017 and converted to separate services and meters by NJNG.

Rahway Housing Authority was also eliminated as a Master Meter facility in CY2017 and converted to separate services and meters by ETG.

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

**Evaluator Notes:**

Inspection days were higher in CY2017 than CY2016: 454.5/427. Excellent description of inspection activities was listed in note section of Attachment 2.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | 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:**

The list of operators match attachment 1. Note section provided a description of master meter systems that were eliminated in CY2017.

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

**Evaluator Notes:**

No incidents/accidents were indicated on attachment 4 for CY 2017. However, when reviewing the files, Mike Stonack indicated that one incident was inadvertently left off Attachment 4. The incident was on July 7, 2017, at 139 Lincoln Avenue in Fair Lawn, NJ. This item will need to be added to the 2017 NJ BPU progress report. As a follow-up, Mike Stonack contacted Carrie Winslow on July 31, 2018, and requested the incident information be added to the Progress Report document. Improvement is needed in assuring all accidents are listed on attachment 4. Therefore a loss of a point occurred.

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

**Evaluator Notes:**

Verification of compliance activities found no civil penalties assessed in CY2017. However, nine probable violations were corrected and the names of the companies listed was provided in the note section. Number of carry over violations was less than in previous year along with the number corrected during CY2017.

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | 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, letters and reports were reviewed and found well-organized. No issues of concern.

- |          |  |   |   |
|----------|--|---|---|
| <b>7</b> | 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, reviewed TQ training records and found five inspectors (two permanent full time, two temporary part time, and one who left the program in February 2017) which includes the Program Manager have completed all required TQ training courses to meet the Gas Inspector Training requirements. Two other permanent full time inspectors had several courses to complete to meet the Gas Inspector training requirements as of the end of CY 2017. Three inspectors had completed the DIMP inspector training requirements and no one has completed the Gas IM training requirements.

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

Evaluator Notes:

NJ has a current civil penalty amount of \$100,000/\$1,000,000 for violations of the pipeline safety regulations. Senate Bill S-2673 was introduced to increase the Maximum Penalties to \$200,000/\$2 M. The current Senate bill (S-679) is still pending before the legislature.

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<b>9</b>	List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10	1	1
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

A detailed description on past and future performance was provided. Excellent information on long term goals and initiatives on construction activities, damage prevention and training was listed.

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<b>10</b>	General Comments:	Info Only	Info Only
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Info Only = No Points

Evaluator Notes:

Question A.4: a loss of one point occurred.

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Total points scored for this section: 9  
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, standard inspection procedures include pre-inspection, inspection and post inspection information are located on page 30-31 under Section 7, Inspection and Compliance Program, in NJ BPU Procedure Manual dated July, 2018.

- |   |  |   |   |
|---|--|---|---|
| 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 include pre-inspection, inspection and post inspection information are located on page 30-33 under Section 7, Inspection and Compliance Program, in NJ BPU Procedure Manual dated July, 2018.

- |   |  |   |   |
|---|--|---|---|
| 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 include pre-inspection, inspection and post inspection information are located on page 30-33 under Section 7, Inspection and Compliance Program, in NJ BPU Procedure Manual dated July, 2018.

- |   |   |   |   |
|---|---|---|---|
| 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 inspection procedures include pre-inspection, inspection and post inspection information are located on page 33 under Section 7, Inspection and Compliance Program, in NJ BPU Procedure Manual dated July, 2018.

- |   |  |   |   |
|---|--|---|---|
| 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 procedures are located on page 32 under Section 7, Inspection and Compliance Program, in NJ BPU Procedure Manual dated July, 2018.

- |   |  |   |   |
|---|--|---|---|
| 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 including pre-inspection, inspection and post inspection are located on page 32 under Section 7, Inspection and Compliance Program, in NJ BPU Procedure Manual dated July, 2018.

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

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

- |    |   |                                      |                          |   |
|----|---|--------------------------------------|--------------------------|---|
| a. | Length of time since last inspection (Within five year interval)  | Yes <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:

Items a thru e are located on page 25-26 under Section 7, Inspection and Compliance Program, in NJ BPU Procedure Manual dated July, 2018. A review of inspection units found them to be broken down correctly. No issues of concern with this information.

**8** General Comments:

Info Only = No Points

Info Only Info Only

Evaluator Notes:

No loss of points 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):  
454.50
- B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
220 X 3.92 = 861.67
- Ratio: A / B  
454.50 / 861.67 = 0.53
- 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) = 454.5
- B. Total Inspection Person Days Charged to the program (220 \* Number of Inspection person years (Attachment 7)) = 861.6663
- Formula:- Ratio = A/B = 454.5/861.6663 = 0.53
- 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. John Grillo, Andre Moses, John Staudenmayer, Juan Urena, & Eric Weaver have completed the OQ course.
- b. Edward Lihan, Juan Urena and Eric Weaver completed the DIMP course requirements. Mike Stonack, Juan Urena, & Eric Weaver have completed the IMP course.
- c. John Grillo, Edward Lihan, & Juan Urena have completed the root cause course.
- d. No outside training was completed or attended by staff in CY2017.
- e. Yes, John Grillo, Edward Lihan, Juan Urena, Eric Weaver, & Michael Stonack have completed all required courses pertaining to gas inspector training requirements.

- 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, Mike Stonack has over twelve years of experience in pipeline safety as the Program Manager.

- 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, President Richard S. Mroz's response letter to Zach Barrett was received on October 10, 2017 and within the sixty day time requirement.

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

Yes, the last seminar was held on October 26, 2016 in Edison, NJ. The next seminar will be held in CY2019.

<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 Yes = 5 No = 0 Needs Improvement = 1-4	5	5
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Evaluator Notes:

Yes, a review of NJ BPU database confirmed all private operators and units were inspected in accordance to the program's time schedule. CY2017 was the second year in the three-year cycle pertaining to inspections of master meter operators. LNG operator records are inspected each year. CY2017 was the 4th year of the 5 year inspection cycle for Drug and Alcohol inspections of the four natural gas utility operators.

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

Yes, they use the federal inspection forms along with NJ BPU forms in reviewing the operator's compliance with the pipeline safety regulations. All forms are listed in the pipeline safety procedure manual. A review of inspection forms and reports found the portion of the inspection report relative to the type of inspection was completed.

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

Yes, this item is listed in NJ BPU Form GS-2 page 2. NJ BPU has also added this question to their construction form to continue monitoring the operator's compliance.

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

Yes, this item is listed in NJ BPU Form GS-3 page 1, under B 4.

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

Yes, this item is listed in NJ BPU Form GS-3 page 2. B 8 (7)



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

Yes, this item is listed in NJ BPU Form GS-3, page 2, B10.

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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, NJ BPU engineers review the operator's annual reports and perform an analysis on the data yearly. This information is posted on a spreadsheet maintained by the Program Manager. Additionally, each inspector reviews with the operator their annual report during a pipeline safety inspection.

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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, operators submitted to NJ BPU annually a report of any changes they have made or updates on their facilities. Additionally, this question is listed on NJ BPU inspection form GS-3 section E.4 on page 9.

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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, this is accomplished by using the PHMSA Form GS-40-199.

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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, this is accomplished using GS-21 or PHMSA Form 14. NJ BPU has a rule N.J.A.C. 14:7-1.23 that requires the operator to file with their organization any proposed updates.

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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, this is accomplished in NJ BPU GS-31, Transmission IMP Inspection. NJ BPU has a rule N.J.A.C. 14:7-1.23 that requires the operator to file with their organization any proposed updates. In CY2016, all four of the private operators were inspected and reviewed pertaining to the IMP program. CY2017, PSE&G was inspected by Mike Stonack on December 20, 2017.

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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 | 2 | 2 |
|-----------|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, all DIMP inspections were performed in CY2014. The second round of DIMP inspections were performed in CY2016. In CY2018 a third round of inspections will be performed.

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

Evaluator Notes:

Yes, Public Awareness program reviews were initially conducted in December 2013. In CY2016, four operator's public awareness programs were reviewed. The operators were Elizabethtown Gas Company, New Jersey Natural Gas, South Jersey Gas & Public Service Electric & Gas. In CY2017, Elizabethtown Gas Company's public awareness program was reviewed. In CY2018, a public awareness effectiveness review was performed on New Jersey Natural Gas, Public Service Electric & Gas, & South Jersey Gas Company by Northeast Gas Association. The results showed a positive awareness of natural gas properties and hazardous of the product.

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- |           |   |                                       |   |
|-----------|---|---------------------------------------|---|
| <b>19</b> | 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, NJ BPU members continue to attend NJ CGA quarterly meetings to communicate with stakeholders. The meeting dates were January 11, April 5th, June 7th & October 4, 2017. A NJ 811 proclamation was signed by the Governor Philip D. Murphy on March 9th that designates April as the Underground Damage Prevention Month.

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- |           |  |                                       |   |
|-----------|--|---------------------------------------|---|
| <b>20</b> | 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:

No safety related condition reports in CY2017.

- 
- |           |  |                                       |   |
|-----------|--|---------------------------------------|---|
| <b>21</b> | Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns? | 1                                     | 1 |
|           |  | Yes = 1 No = 0 Needs Improvement = .5 |   |

Evaluator Notes:

Yes, this was accomplished by e-mail sent to each operator by Mike Stonack regarding this item. A review of files confirm this item was completed each year and responses reviewed. No areas of concern.

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

Evaluator Notes:

Yes, a review of emails from Robert Clarillos to Mike Stonack confirm several responses were provided to NAPSRS. The dates of the surveys are 08-17-17, 09-14-17 & 12-9-17.

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- |           |   |                                       |   |
|-----------|---|---------------------------------------|---|
| <b>23</b> | 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:

No waivers or special permits were issued in CY2017.

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

Evaluator Notes:

Yes, Mike Stonack attended the NAPS 2017 Board of Directors meeting in Columbus, OH in September, 2017.

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- 25** Discussion on State Program Performance Metrics found on Stakeholder Communication site - <http://primis.phmsa.dot.gov/comm/states.htm> 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:

a & b. Reviewed PHMSA State Program Metrics and found leaks repaired per 1,000 miles were showing a continue downward trend from previous year. It appears the number is 2.25 damages per 1,000 locate request. Leaks outstanding per 1,000 was also trend downward. Program Manager and staff will continue to monitor and review these items and discuss with operators during their inspections and take AA action.

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

Evaluator Notes:

Discussed with Mike Stonack the SIDCT. A few minor changes were made based on the elimination of two master meter operators. The anticipate CY2018 inspection person days will be 554.

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

Evaluator Notes:

No pipeline flow reversals occurred in CY2017. NJ operators are required to inform NJ BPU of this action due to the Bureau's rule.

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- 28** 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: 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 | <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:**

- a. This is located on page 33, NJ BPU Operation Manual Section 7, Inspection & Compliance dated July, 2018.  
b. This is located on page 33-34, NJ BPU Operation Manual Section 7, Inspection & Compliance dated July, 2018.  
c. This is located on page 34 NJ BPU Operation Manual Section 7, Inspection & Compliance dated July, 2018.

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

- a. Yes, a review of compliance action letter sent to Public Service Electric & Gas Company on May 25, 2017 confirm the letter was to the company officer, Ms. Tamara Linde, Executive Vice President. Additional letters reviewed found they were mailed to the company officer.  
b. Yes, violations were found and noted in the letters.  
c. Probable violations were resolved within the established time schedule.  
d. All violations were reviewed monthly.  
e. Yes this is identified in the last paragraph of letter, NJAC 14:7-2.3 an amount of \$100,000 per day or \$1,000,000 for any series of violations.  
f. Yes, see NJ BPU Operation Manual Section 7, Inspection & Compliance dated July, 2018.

- |          |  |          |          |
|----------|--|----------|----------|
| <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, six compliance actions were issued in CY2017 as found in data base and listed on 2017 NJ BPU Progress Report, Attachment 5- Stats on Compliance Actions

- |          |   |          |          |
|----------|---|----------|----------|
| <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, NJ BPU rule section 14:7-2.6 provides the operator and all parties due process including a show cause.

- |          |   |          |          |
|----------|---|----------|----------|
| <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, Mike Stonack is familiar with this process and has issued a civil penalty in the past to several operators. The last civil penalty issues was in CY2016 against South Jersey Gas in the amount of \$150,000

---

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

Evaluator Notes:

Yes, this was demonstrated in the civil penalty issued against South Jersey Gas in CY2016.

---

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

Evaluator Notes:

No loss of point 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, this information is located on pages 38, under section 8.1, Failure Investigation and Safety Related Condition Reports in NJ BPU Pipeline Safety Procedure Manual.

- 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, a. page 38-41, under section 8, Failure Investigation and Safety Related Condition Reports in NJ BPU Pipeline Safety Procedure Manual address this item and Appendix F

Yes, b. this information is listed on page 38-41, NJ BPU Pipeline Safety Procedure Manual and the full documents are provided in Appendix G of their procedures.

- 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, all telephonic calls and emails from operators pertaining to incidents/accidents are responded to by NJ BPU pipeline safety inspectors. NJ BPU require all operators to report incidents/accidents by e-mail to all inspectors. A decision to not go to a site will be rendered by the Program Manager and placed in the operator's file folder.

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

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

Evaluator Notes:

Yes, the one incident that occurred in CY2017 was investigated and thoroughly documented with information and findings of fact.

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

Evaluator Notes:

No violations were found or noted in the investigation of the incident. Cause of the incident was due to a downed power line igniting a gas service at the curb valve box location.

- 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 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, Mike Stonack has related information on incident reports to the Region Office and AID. A review of file found correspondence was conducted with Brian Pierzina on October 12, 2017 pertaining to the incident at 139 Lincoln Avenue in Fair Lawn, NJ.

---

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

Evaluator Notes:

Yes, Mike Stonack provided an overview of the incident at the 2018 NAPSAR Eastern Region meeting held at Penn State University.

---

- 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: 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, this is accomplished by New Jersey Administrative Code Section 14:7-1.25 and reviewed with the operator during a construction inspection.

- |   |  |   |   |
|---|--|---|---|
| 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 is accomplished on construction and office visits. They use NJ BPU GS 9-ST & GS 9- PL & GS-1 forms to monitor this item.

- |   |  |   |   |
|---|--|---|---|
| 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, during the months of February thru April each year, a weekly breakfast and training seminar on damage prevention and using the 811 number is conducted with stakeholders. Over 1,431 stakeholders attended the 12 contractor meetings in several regions of the state which cover all counties in the state.

- |   |  |   |   |
|---|--|---|---|
| 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, NJ BPU reviews the pipeline damages quarterly and annually. In CY2017, New Jersey had 2.49 pipeline damages per 1,000 locate request. The number of total ticket requests has continue to increase by 11 percent from previous year.

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

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

Name of Operator Inspected:

PSE&G Company

Name of State Inspector(s) Observed:

Andre Moses, John Staudenmayer and Juan Urena

Location of Inspection:

Ewing & Monroe Township, NJ

Date of Inspection:

July 24 & 26, 2018

Name of PHMSA Representative:

Glynn Blanton, PHMSA State Programs

Evaluator Notes:

Observed two separate construction inspections at two different locations on July 24 & 26, 2018.

July 24th: Service line was replaced and meter moved out of basement at 531 Patton Drive & Cleardale Avenue in Ewing Township. The 8 " cast iron main was recently replaced with PE. The new service line was connected to the PE main line. Work was performed by Lantier Construction Company, a contractor hired by PSE&G Company. Inspectors checked OQ records of individuals, company procedures on installation and tie-in of service line to main.

July 26th: Installation of a new 12" API 5L X-42 wall thickness .250 steel pipeline located at Spotswood Englishtown Road in Monroe Township. The construction contractor was Henkels & McCoy hired by PSE&G Company. Witnessed welding of sections of pipe, shrink wrapping the welding area and lowering of pipe into the ditch line. OQ records, company procedures on welding, jeeeping the pipe and welded areas, depth of ditch line and other information was reviewed and checked.

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

Evaluator Notes:

Yes, the operator,PSE&G Company, was notified several weeks in advance of the inspection.

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

Evaluator Notes:

Yes, each inspector used the construction form and checklist during the inspection. Validation of pipeline material, procedures and locate ticket for the area was reviewed and checked.

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

Evaluator Notes:

Yes, this evaluator observed both inspectors documenting the results of their inspection on the construction forms.

- 5 Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps,pyrometer,soap spray,CGI,etc.) 1 1  
Yes = 1 No = 0

Evaluator Notes:

Yes, a review of equipment and records of procedures was reviewed prior to witnessing the work being performed by the construction crews.

- 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:**

A thorough review of records, procedures, drawings and construction prints was conducted at each of the two inspection sites.

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

**Evaluator Notes:**

Yes, Juan Urena has four years of experience and has completed the Gas Inspector requirements, John Staudenmayer has two years of experience and will complete gas inspector requirements in August 2018, and Andre Moses has one and three-fourths years of experience and needs two more courses to complete gas inspector requirements.

- |          |   |   |   |
|----------|---|---|---|
| <b>8</b> | Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) | 1 | 1 |
|          | Yes = 1 No = 0  |   |   |

**Evaluator Notes:**

Yes, a verbal exit interview was conducted with the Foreman or Company construction engineer after each inspection was completed.

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

**Evaluator Notes:**

A probable violation was been considered by NJBPU inspectors on the shrink wrap procedure used by the contractor on the 12" pipeline construction project welding tie-in.

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

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

- |    |                                   |                                     |
|----|-----------------------------------|-------------------------------------|
| s. | New Construction                  | <input 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 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 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