



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

1200 New Jersey Avenue SE
Washington DC 20590

2013 Natural Gas State Program Evaluation

for

VIRGINIA STATE CORPORATION 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)

2013 Natural Gas State Program Evaluation -- CY 2013
Natural Gas

State Agency: Virginia

Agency Status:

Date of Visit: 05/19/2014 - 06/30/2014

Agency Representative: Massoud Tahamtani, Director of Utility & Railroad Safety
Jim Hotinger, Assistant Director of Utility & Railroad Safety
Drew Eaken, Senior Utilities Engineer
James Fisher, Senior Utilities Engineer

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

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

Name/Title: Judith W. Jagdmann, Chairman
Agency: Virginia State Corporation Commission
Address: Tyler Building, P.O. Box 1197
City/State/Zip: Richmond, Virginia 232218

Rating:

60105(a): Yes **60106(a):** Yes **Interstate Agent:** Yes

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 2013 (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	9	9
B	Program Inspection Procedures	15	15
C	Program Performance	45	45
D	Compliance Activities	15	15
E	Incident Investigations	4	4
F	Damage Prevention	8	8
G	Field Inspections	12	12
H	Interstate Agent State (If Applicable)	0	0
I	60106 Agreement State (If Applicable)	5	5
TOTALS		113	113
State Rating			100.0

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- | | | | |
|----------|---|---|---|
| 1 | Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1 (A1a)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

We performed a review on information entered into Attachment 1 and found it correct. A review of VSCC office records indicated all inspection units match records listed in the 2013 Progress Report Attachment 1. The totals on inspection units in Attachment 3 are consistent with the operator unit totals on Attachment 1. No areas of concerns were found or noted.

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|----------|--|---|---|
| 2 | Review of Inspection Days for accuracy - Progress Report Attachment 2 (A1b)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

A review of the 2013 VSCC Progress Report found the number of inspection days entered matched the office files. Verified the Protocol 9 inspections were uploaded into the PHMSA Operator Qualification database. No issues were found or noted.

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| 3 | Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3 (A1c)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Verified the number of operators and inspection units on Attachment 3 matched the office records maintained by Virginia State Corporation Commission by reviewing office files. No issues and information is correct.

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| 4 | Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4 (A1d)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
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Evaluator Notes:

No incidents/accidents occurred or were listed on Attachment 4. No issues.

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|----------|--|---|---|
| 5 | Accuracy verification of Compliance Activities - Progress Report Attachment 5 (A1e)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

A review of Attachment 5, Stats on Compliance Actions, found the number of compliance actions, violations found and corrected were reported correctly. A total civil penalty assessed and collected during CY2013 was \$627,550 against the following operators.

Atmos Energy Corporation URS-2013-00173	\$36,150
Virginia Natural Gas URS-2012-00449	\$75,600
Washington Gas & Light URS-2011-00409	\$143,500
Washington Gas & Light URS-2012-00130	\$154,800
Columbia Gas of Virginia URS-2013-00175	\$207,500
Appalachian URS-2010-00391	\$10,000

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|----------|---|---|---|
| 6 | Were pipeline program files well-organized and accessible? - Progress Report Attachment 6 (A1f, A4)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

File folders were accessible and well-organized. Each file contained the inspection report and letter to the operator pertaining to the inspection or violations found. All reports reviewed support the safety program activities and inspections performed. Additionally, all records listed on Attachment 6 match documents maintained in the VA SCC office. No areas of concern.

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| 7 | Was employee listing and completed training accurate and complete? - Progress Report Attachment 7 (A1g)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, a detailed review of employees listed on Attachment 7 was conducted and compared to the SABA training transcript.
No areas of concern.

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| 8 | Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8 (A1h)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

VSCC has automatic adoption of federal regulations. No issues.

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| 9 | List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10 (H1-3)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

A review of Attachment 10 found a good summary of planned and past performances by VSCC. No issues of concern.

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

Evaluator Notes:

No loss of points occurred in this section. VSCC has generally met the requirements of Part A.

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

PART B - Program Inspection Procedures

Points(MAX) Score

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|----------|--|---|---|
| 1 | Standard Inspections (B1a)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

Yes, this is listed in VSCC Pipeline Safety Program Procedures on page 15. The procedures contain established frequencies and include a risk based method to schedule the inspections. All gas operators are inspected each year and 10% of their facilities are reviewed. This information is listed on page 9.

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| 2 | IMP Inspections (including DIMP) (B1b)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, this is listed in VSCC Pipeline Safety Program Procedures on page 9 & 13. IMP inspections are performed every year and field audits as necessary. This would include pig digs, pig runs, etc. No areas of concern.

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| 3 | OQ Inspections (B1c)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, this is listed in VSCC Pipeline Safety Program Procedures on page 14. OQ inspections are performed during the standard inspection and field checks. If a probable violation is found in the field the VSCC inspector will check the operator's individual qualifications. No concerns.

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| 4 | Damage Prevention Inspections (B1d)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, this is listed in VSCC Pipeline Safety Program Procedures on page 13. During the standard inspection, the VSCC inspector will check the operator's locate tickets and field check the marking of the facilities.

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| 5 | On-Site Operator Training (B1e)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

On site operator training is provided by staff members at the VSCC Pipeline Safety Seminar. No issues.

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|----------|---|---|---|
| 6 | Construction Inspections (B1f)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, this is listed in VSCC Pipeline Safety Program Procedures on pages 8 & 9. Operators are required to file with VSCC the construction project on daily or larger projects over \$100,000 within ten days prior to the start of the construction. No issues.

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| 7 | Incident/Accident Investigations (B1g)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

Yes, this is listed in VSCC Pipeline Safety Program Procedures in Section VIII. Also, additional information is listed in Appendix 8 in detail about their investigation of the incidents. No areas of concern.

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| 8 | Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? (B2a-d, G1,2,4)
Yes = 6 No = 0 Needs Improvement = 1-5 | 6 | 6 |
|----------|---|---|---|

- | | | | | |
|----|---|--------------------------------------|--------------------------|---|
| a. | Length of time since last inspection | 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 ☒ No ☐ Needs Improvement ☐
- e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors) Yes ☒ No ☐ Needs Improvement ☐
- f. Are inspection units broken down appropriately? Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

- A. Yes, this is listed in VSCC Pipeline Safety Program Procedures on page 9.
 B. Yes, this is listed as previous year's inspection records on page 10.
 C. Yes, this is identified on page 10.
 D. Yes, this is listed on page 12.
 E. Yes, this is listed on page 11.
 F. Yes, this is listed on page 10.

9 General Comments:
 Info Only = No Points

Info Only Info Only

Evaluator Notes:

No loss of points occurred in this section. VSCC has generally met the requirements of Part B.

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

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 (A12) 5 5
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):
1820.90

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
 $220 \times 10.83 = 2383.33$

Ratio: A / B
 $1820.90 / 2383.33 = 0.76$

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

Evaluator Notes:

A. Total Inspection Person Days (Attachment 2) = 1820.9

B. Total Inspection Person Days Charged to the program ($220 \times$ Number of Inspection person years (Attachment 7) = 2383.33304

Formula:- Ratio = A/B = $1820.9/2383.33304 = 0.76$

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 for requirements) Chapter 4.4 (A8-A11, G19) 5 5
Yes = 5 No = 0 Needs Improvement = 1-4

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

Evaluator Notes:

A review of TQ records indicate newly hired inspectors have completed several Web Based Training Courses before attending the PL1250 in CY2013. DIMP/IMP training courses have been completed before conducting an inspection. Five inspectors have completed the Root Cause course. In-house training is provided to all new inspectors prior to attending TQ. No issues.

- 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 (A5) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, Jim Hotinger, Assistant Director has extensive knowledge of Virginia's rules and regulations and the pipeline safety 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 (A6-7) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, Chairman James Dimitri response letter to Zach Barrett was received on July 19, 2013. The response was within the 60 day time requirement. In the letter, Chairman Dimitri addressed the two areas of concern. No issues.

- 5** Did State hold PHMSA TQ Seminar in Past 3 Years? Chapter 8.5 (A3) 2 2
Yes = 2 No = 0

Evaluator Notes:

Yes, VSCC held a TQ seminar on October 8-10, 2013 in Virginia Beach, VA at the Hilton Hotel. The number of attendees was 232 consisting of operators, PHMSA, gas contractors and vendors.

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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 (B3)
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|----------|---|---|---|

Evaluator Notes:

Yes, a review of VSCC PIPES data base and file folders found all operators were inspected in accordance with their established written procedures. A sample of inspections conducted found PHMSA Form 1 was used for Douglas Pipeline Company Gas Gathering Systems inspected on September 23, 2013, Form 2 for Distribution Inspection was used on City of Danville inspection performed during CY2013 and Form 4 was used on Roanoke Gas Company LNG facility conducted on September 16, 2013. No issues.

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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 (B4-5)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

Yes, VSCC inspectors use the federal inspection forms to perform inspections. The form and information is uploaded into the PIPES data base. A check of inspection forms found the documents to be complete with required information. No issues.

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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 (B7)
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Yes, VSCC includes this question along with four others on NTSB in each of the inspections performed on their operators. A review of the inspection performed on the City of Richmond dated December 19, 2013 indicated this item was reviewed with the operator. No issues.

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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 (B8)
Yes = 1 No = 0 | 1 | 1 |
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Evaluator Notes:

Yes, VSCC includes this question along with four others on NTSB in each of the inspections performed on their operators. A review of the inspection performed on the City of Richmond dated December 19, 2013 indicated this item was reviewed with the operator. No issues.

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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 (B9)
Yes = 1 No = 0 | 1 | 1 |
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Evaluator Notes:

Yes, VSCC includes this question along with four others on NTSB in each of the inspections performed on their operators. A review of the inspection performed on Washington Gas Light Company dated December 10, 2013 indicated this item was reviewed with the operator. No issues.

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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 (B10,E5)
Yes = 1 No = 0 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes, a review of inspection reports performed on operators indicated this item was reviewed.

12	Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues? Data Initiative (G6-9,G16) Yes = 2 No = 0 Needs Improvement = 1	2	2
Evaluator Notes: Yes. VSCC staff members review the operator's annual reports and record the results into their PIPES data base. This information is used in the risk ranking inspection model for determining inspections.			
13	Did state input all applicable OQ, IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1 (G10-12) Yes = 2 No = 0 Needs Improvement = 1	2	2
Evaluator Notes: Yes, a review of the OQDB web site indicated four OQ inspection results were unloaded into the federal database in a timely manner. All OQ inspections were performed on Columbia Gas of Virginia. A review of IMP DB found no results have been entered because violations were found and potential penalties may be issued by VSCC. The four IMP inspections performed are listed below: Columbia Gas of Virginia 10/28/2013, Virginia Natural Gas 07/11/2013, Roanoke Gas Company 11/20/2013, Washington Gas Light Company 09/17/2013.			
14	Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission? (G14) Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: Yes, this item is listed on the federal form 1- Transmission Line Inspection and VSCC staff members monitor this item on their new construction notifications from the operator.			
15	Is the state verifying operators are conducting drug and alcohol tests as required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199 (I1-3) Yes = 2 No = 0 Needs Improvement = 1	2	2
Evaluator Notes: Yes, VSCC inspectors during their field inspections will verify the operator is conducting this requirement. They use PHMSA Federal form 13 and include a copy and review of the company's USDOT Drug & Alcohol Testing MIS Data Collection document.			
16	Is state verifying operators OQ programs are up to date? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals determined in the operators plan. 49 CFR 192 Part N (I4-7) Yes = 2 No = 0 Needs Improvement = 1	2	2
Evaluator Notes: Yes, this is performed by the inspector during the field inspection. They use the federal inspection form in verifying the operator's compliance. VSCC verify plans are updated and individuals qualified by check cards and procedures when on site at a construction site.			
17	Is state verifying operator's gas transmission integrity management programs (IMP) are up to date? This should include a previous review of IMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart 0 (I8-12) Yes = 2 No = 0 Needs Improvement = 1	2	2
Evaluator Notes: Yes, this is checked on Gas Integrity Management Protocols and discussed with the operator. A review of records found four gas transmission operators have not complied with their plans correctly. VSCC has recently issued a Notice of Probable Violation against these companies and waiting on a response from the operators.			

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| 18 | Is state verifying operator's gas distribution integrity management Programs (DIMP)?
This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart P
DIMP ? First round of program inspections should be complete by December 2014 | 2 | 2 |
|----|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, VSCC inspectors have completed all DIMP inspections on all distribution systems using Federal Form 22. A review of DIMP data base found four inspection reports have been uploaded into the database. The remaining seven inspections reports will be uploaded when the operators provide additional information.

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| 19 | Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. 49 CFR 192.616 (I13-16)
PAPEI Effectiveness Inspections should be complete by December 2013 | 2 | 2 |
|----|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, VSCC inspectors have verified and completed all public awareness inspections before December, 2013. Listed below are the operators and inspection dates: Washington Gas & Light Company (4-23-12), RGC Resources (12-14-12), NiSource (1-31-12), AGL Resources (3-14-12), Atmos Energy (1-10-12), City of Danville (4-17-13), Appalachian Natural Gas (11-12-13), Southwestern Virginia Gas Company (12-3-13), City of Richmond (12-21-12) & City of Charlottesville (2-18-13).

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| 20 | Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public). (G20-21) | 1 | 1 |
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, this is accomplished via their web site, quarterly meetings with company officials, emails to all operators on alert notices and Virginia Gas Operators Association.

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| 21 | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 (B6) | 1 | NA |
|----|---|---|----|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No Safety Related Condition Report in CY2013.

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| 22 | Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns? (G13) | 1 | 1 |
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, this is addressed in the DIMP plan. Additionally, this is reviewed in leak records submitted by the operator.

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| 23 | Did the state participate in/respond to surveys or information requests from NAPSRS or PHMSA? (H4) | 1 | 1 |
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, a review of email correspondence from Robert Clarillos dated February 4, 2014 showed VSCC responded to survey questions on NAPSRS Issues.

- 24** If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate. Info OnlyInfo Only
Info Only = No Points

Evaluator Notes:

No waiver or special permits have been issued by VSCC.

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

Evaluator Notes:

No loss of points occurred in this section. VSCC has generally met the requirements of Part C.

Total points scored for this section: 45
Total possible points for this section: 45

PART D - Compliance Activities**Points(MAX) Score**

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|----------|---|---|---|
| 1 | Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1 (B12-14, B16, B1h)
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| a. | Procedures to notify an operator (company officer) when a noncompliance is identified | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Procedures to routinely review progress of compliance actions to prevent delays or breakdowns | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

- a. This is located in VSCC Pipeline Safety Procedure Appendix 7, PIPELINE SAFETY ENFORCEMENT PROCEDURES FOR JURISDICTIONAL OPERATORS, page 35. Notification is sent to company compliance representative or officer as described on page 36.
- b. Procedures to routinely review compliance action is listed on page 17, Follow-up Inspection. "Follow up reviews to determine compliance with the Commission's Orders is performed by the Office Manager to ensure operators' perform the required tasks detailed as part of remedial measures in the Orders".

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|----------|--|---|---|
| 2 | Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1 (B11,B18,B19)
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| a. | Were compliance actions sent to company officer or manager/board member if municipal/government system? | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Were probable violations documented? | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Were probable violations resolved? | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. | Was the progress of probable violations routinely reviewed? | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

- a. A review of compliance action documents found a letter sent to Virginia Natural Gas Company, Mr. Robert Duvall, Vice President dated August 27, 2013; case number URS-2013-00176 supported this item. Additionally, the initial inspection was performed and violations found on January 8, 2013. The inspection report is INS-2013-3423.
- b. Yes, a check of files found probable violations were documented correctly for several operators cited during CY2013. In this regard, a review of the inspection reports for Roanoke Gas Company Case number URS-2013-00173 demonstrated violations were documented.
- c. Yes, probable violations were resolved by company action to pay the civil penalty of \$36,150.
- d. Yes, this is routinely reviewed during monthly staff meetings.

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| 3 | Did the state issue compliance actions for all probable violations discovered? (B15)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

- Yes, a review of VSCC files and progress report indicated 83 probable violations were cited against operators for non-compliance.

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| 4 | Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary. (B17, B20)
Yes = 2 No = 0 | 2 | 2 |
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Evaluator Notes:

- Yes, this process is described in VSCC Pipeline Safety Procedures Manual, page 38 and in the letter to the operator. No issues.

- | | | | |
|----------|---|---|---|
| 5 | Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken) (B27)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

Yes, Program Manager and staff members are familiar with imposing civil penalties. CY2013, VSCC assessed and collected \$627,550.00 from six operators.

- 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, CY2013, VSCC assessed and collected \$627,550.00 from six operators.

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

Evaluator Notes:

No loss of points occurred in this section. VSCC has generally met the requirements of Part

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

PART E - Incident Investigations**Points(MAX) Score**

- | | | | |
|----------|---|--------------------------------------|--|
| 1 | 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 (A2,D1-3)
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:

- a. This item is listed and located on page 45, Appendix 8 of VA SCC Pipeline Safety Procedure Manual.
b. This item is listed and located on page 44, Appendix 8 of VA SCC Pipeline Safety Procedure Manual.

- | | | | |
|----------|---|---|---|
| 2 | 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 (D4)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

This item is listed and located on page 49 & 50, Attachments 1 & 2 of VA SCC Pipeline Safety Procedure Manual.

- | | | | |
|----------|--|--------------------------------------|--|
| 3 | Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? (D5)
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | NA |
| 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:

No incidents occurred in CY2013.

- | | | | |
|----------|--|---|----|
| 4 | Did the state initiate compliance action for violations found during any incident/accident investigation? (D6)
Yes = 1 No = 0 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

No incidents occurred in CY2013.

- | | | | |
|----------|--|---|----|
| 5 | Did the state assist region office by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 (D7)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

No incidents occurred in CY2013.

- | | | | |
|----------|--|---|---|
| 6 | Does state share lessons learned from incidents/accidents? (sharing information, such as: at NAPSR Region meetings, state seminars, etc) (G15)
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Yes, this is discussed at the TQ Seminars, monthly Damage Prevention Advisory Committee meetings and NAPSR Eastern Region Meeting.

- | | | | |
|----------|-------------------|-----------|-----------|
| 7 | General Comments: | Info Only | Info Only |
|----------|-------------------|-----------|-----------|

Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section. VSCC has generally met the requirements of Part E.

Total points scored for this section: 4

Total possible points for this section: 4

PART F - Damage Prevention

Points(MAX) Score

- | | | | |
|---|---|---|---|
| 1 | Has the state reviewed directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies? NTSB (E1)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Yes, VSCC includes this question along with four others on NTSB in each of the inspections performed on their operators. A review of the inspection performed on the Columbia Gas of Virginia dated November 15, 2013 indicated this item was reviewed with the operator. No issues.

- | | | | |
|---|--|---|---|
| 2 | Did the state inspector check to assure the pipeline operator is following its written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? (E2)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, VSCC uses the Standard Inspection Form 2 which includes a question on this item on page 5 of 31. A check on this item found the inspection performed on Roanoke Gas Company, dated November 21, 2013 confirmed this item was checked. No issues.

- | | | | |
|---|---|---|---|
| 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.) (E3)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Yes, VSCC adopted the CGA Best Practices and continues to provide information to all stakeholders and operators on marking, hand digging and directional drilling.

- | | | | |
|---|--|---|---|
| 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) (E4,G5)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, VSCC continues to maintain a database on the number of pipeline damages that are reported by the operator to their agency. VA One Call center also provides information to VSCC on the number of ticket request by a caller involving gas facilities in the area. Using the damage reports and locate requests, VSCC determines the number of damages per 1,000 locate request.

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

Evaluator Notes:

No loss of points occurred in this section. VSCC has generally met the requirements of Part F.

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

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

Name of Operator Inspected:

Virginia Natural Gas South (ID 18166)

Name of State Inspector(s) Observed:

Rick Vanderploeg, Utilities Engineer & Harry Smith, Associate Utilities Engineer

Location of Inspection:

Virginia Beach, VA

Date of Inspection:

May 27 & 28, 2014

Name of PHMSA Representative:

Glynn Blanton, US DOT/PHMSA State Programs

Evaluator Notes:

This was a two day inspection on Virginia Natural Gas Company with two different VSCC Inspectors on separate days. The first inspection was conducted on May 27, 2014 with Rick Vanderploeg. The following operator representatives were present:

Chris Wrocklage, PE, Managing Director System Operations AGL Resources/Virginia Natural Gas

John Jones & Brady Beasley, Maintenance crew members.

The site inspection consisted of a review of six regulator stations checking the relief settings and shut in of each regulator and reviewing the settings of all devices. Listed below is the location of the regulators stations:

1. Hwy 168 North @ Trailer Park
2. Kimball Terrace @ Majestic Avenue
3. Kempsville Road @ Bellany Manor Drive
4. Malibu Station along Hwy 58
5. Bellsroad Station along Virginia Power transmission line
6. Indian River Road

Areas of concern: water level in Hwy 168 and Kimball stations, relief stack location at Kimball is to close home, static lines to regulators in Malibu and Indian River were not stable. Exit interview was conducted and advise operator of potential violations. Rick Vanderploeg was to investigate relief stack design and other items before issuing a letter to the operator. Excellent work was performed by the inspector and a very thorough review of each regulator station.

The second day observed Harry (Justin) Smith with Drew Eaken on May 28, 2014 performing new construction inspection on Virginia Natural Gas Company . The following operator representatives were present:

Greg Asbell, Project Coordinator- Virginia Gas Company

This was a full day inspection checking construction work on new mains and service lines being installed. The first location at Princess Ann Road and High Gate Green observed the VSCC inspector checking Ross & Sons Utility Contractors installing a 2" Driscopex main. We witnessed pipe installation and fusion of pipe by Donald Davis. Inspector checked welding & fusion cards and operator qualifications. Second project consisted of a service line installation at Dermott Avenue and Lakeview Drive by David Hilton crew foreman, and third project at Cornerstone Townhouse witnessed Marshall Perrine, Foreman with Ross & Sons Contractors. No areas of concerns were noted or found by the inspector. An exit interview was conducted at each construction site by the VSCC inspector. A very thorough inspection was observed.

- | | | | |
|---|---|---|---|
| 2 | Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? (F2)
Yes = 1 No = 0 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

Yes, Virginia Natural Gas Company was notified on May 21, 2014.

- | | | | |
|---|--|---|---|
| 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) (F3)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, both inspectors used VSCC inspection forms in observing work being performed by the operator and checked the item on the form. No areas of concern.

4	Did the inspector thoroughly document results of the inspection? (F4)	2	2
Yes = 2 No = 0 Needs Improvement = 1			

Evaluator Notes:

Yes.

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.) (F5)	1	1
Yes = 1 No = 0			

Evaluator Notes:

Yes, both inspectors checked the operator's equipment, machinery and tools being used to in completing the required tasks or construction projects.

6	Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) (F7)	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:

Yes, each inspector requested from the operator copies of Operator Qualification for each individual performing a covered task and review welding and fusion card certifications. No issues of concern.

7	Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) (F8)	2	2
Yes = 2 No = 0 Needs Improvement = 1			

Evaluator Notes:

Yes, Mr. Rick Vanderploeg has extensive knowledge in regulator and relief maintenance that was obtained from working with a private natural gas operator for twenty plus years. Mr. Harry Smith has a good working knowledge of the regulations and has recently completed all of the TQ courses.

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) (F9)	1	1
Yes = 1 No = 0			

Evaluator Notes:

Yes, both inspectors conducted exit interviews with the operator's representatives. Mr. Rick Vanderploeg provided an additional follow-up at the VNG Malibu Station to insure the insulating unions were installed as needed.

9	During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable) (F10)	1	1
Yes = 1 No = 0			

Evaluator Notes:

No violations were found or cited. However, areas of concern were discussed with the operator representatives resulting in insulating unions being installed and a review of the relief stack at Kimball Terrace @ Majestic Avenue.

10	General Comments: What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) Other.	Info Only	Info Only
Info Only = No Points			
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 type="checkbox"/>
l.	Inspection of Right-of-Way	<input checked="" type="checkbox"/>
m.	Line Markers	<input checked="" type="checkbox"/>
n.	Liaison with Public Officials	<input type="checkbox"/>
o.	Leak Surveys	<input type="checkbox"/>
p.	MOP	<input type="checkbox"/>
q.	MAOP	<input type="checkbox"/>
r.	Moving Pipe	<input type="checkbox"/>
s.	New Construction	<input 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 checked="" type="checkbox"/>
C.	Tapping	<input type="checkbox"/>
D.	Valve Maintenance	<input checked="" type="checkbox"/>
E.	Vault Maintenance	<input type="checkbox"/>
F.	Welding	<input checked="" type="checkbox"/>
G.	OQ - Operator Qualification	<input checked="" type="checkbox"/>
H.	Compliance Follow-up	<input type="checkbox"/>
I.	Atmospheric Corrosion	<input checked="" type="checkbox"/>
J.	Other	<input checked="" type="checkbox"/>

Evaluator Notes:
See G.1

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

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

- | | | | |
|----------|---|---|----|
| 1 | Did the state use the current federal inspection form(s)? (C1)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

NA

- | | | | |
|----------|--|---|----|
| 2 | Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? (C2)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

NA

- | | | | |
|----------|---|---|----|
| 3 | Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? (C3)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

NA

- | | | | |
|----------|--|---|----|
| 4 | Were probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) (C4)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

NA

- | | | | |
|----------|--|---|----|
| 5 | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (C5)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

NA

- | | | | |
|----------|---|---|----|
| 6 | Did the state give written notice to PHMSA within 60 days of all probable violations found? (C6)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

NA

- | | | | |
|----------|--|---|----|
| 7 | Did the state initially submit documentation to support compliance action by PHMSA on probable violations? (C7)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

NA

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

Evaluator Notes:

NA

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

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

- | | | | |
|----------|--|---|---|
| 1 | Did the state use the current federal inspection form(s)? (B21)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Yes, a review of inspection performed on City of Danville dated May 9, 2013; INS-2013-4149 show the Federal Inspection form was used. No issues.

- | | | | |
|----------|--|---|---|
| 2 | Are results documented demonstrating inspection units were reviewed in accordance with state inspection plan? (B22)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Yes, a review of inspection performed on City of Danville dated May 8, 2013 confirmed VSCC is following the state inspection plan. VSCC inspects all municipal gas operators annually. No issues.

- | | | | |
|----------|---|---|---|
| 3 | Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) (B23)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Yes, VSCC found two violations, 192.483 & 192.727 on May 8, 2013. Correspondence between the operator and their agency was conducted on July 19, 2013 prior to be submitted to PHMSA. The violations were referred to PHMSA Eastern Region office on July 23, 2013.

- | | | | |
|----------|---|---|----|
| 4 | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (B24)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

NA. No condition of imminent safety hazard occurred in CY2013.

- | | | | |
|----------|--|---|---|
| 5 | Did the state give written notice to PHMSA within 60 days of all probable violations found? (B25)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Yes, a review of file on City of Danville found VSCC provided all supporting documentation to PHMSA Eastern Region within 60 days. No issues.

- | | | | |
|----------|--|---|---|
| 6 | Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? (B26)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Yes, a review of file folder for the City of Danville indicated adequate documentation was provided. No issues.

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

Evaluator Notes:

No issues.

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