



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

PR Department of Transp. and Public Works

### 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:** Puerto Rico

**Agency Status:**

**Date of Visit:** 05/21/2018 - 05/25/2018

**Agency Representative:** Alice Velazquez

Samuel A. Rodriguez Gonzalez

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

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

**Name/Title:** Carlos M. Contreras, Secretary

**Agency:** Department of Transportation and Public Works

**Address:** P. O. Box 41269, Minillas Station

**City/State/Zip:** San Juan, Puerto Rico 00940-1269

**Rating:**

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

## INSTRUCTIONS:

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

## Field Inspection (PART G):

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

## Scoring Summary

### PARTS

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	9.5
13	13
33	32.5
15	14
4	3
6	6
12	12
0	0
0	0

### TOTALS

**93 90**

### State Rating

**96.8**

## 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 of Attachment 1 - Stats on Operators found the information correct. Two operators and six inspection units were not inspected in CY2017 resulting in percentage of operators inspected at 75% and units at 81.3%. In CY2016 the percentage was 83.3% and 96.6%.

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

A review of records and files found information on Attachment 2- State Inspection Activity was correct. The number of inspections performed in CY2017 (86) was less than in CY2016 (94) due to storm damage and hurricanes.

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

A reviewed of Attachment 3 - List of Operators found the information correct. Information on Attachment 1 pertaining to operators and inspection units match. No areas of concerns were found.

- |          |  |   |   |
|----------|--|---|---|
| <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 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

No incidents occurred in CY2017.

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

**Evaluator Notes:**

Reviewed and verified violations found, corrected and carry over for calendar year 2017. In CY2016 Progress Report the number of carry overs were 72. However a review of CY2017 Progress Report show the number to be 35. In reviewing the information an error occurred in the number of carry overs and number corrected during the CY. The correct number of carried over is 72 not 35 and number corrected during CY was 98 not 61. Will have program manager contact Carrie Winslow to correct the CY2017 Progress report. A loss of half a point occurred due to this error.

- |          |   |   |   |
|----------|---|---|---|
| <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, inspection reports, letters, forms and other pipeline safety information was accessible in the office. Documents were found in the bookshelf located in Samuel Rodriguez office. All forms used by inspectors are listed in the Pipeline Safety Program Administrative Procedures.

- |          |  |   |   |
|----------|--|---|---|
| <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, a review of SABA found Samuel Rodriguez Gonzalez & Alice Velazquez have completed all seven training courses for gas inspector. Zuleika Rutz needs to complete the remaining four courses before December 2019 to become qualified as a gas inspector and prevent the loss of points to the PR DTPW Pipeline Safety Program.

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

Evaluator Notes:

Information listed in Attachment 8 is correct. They have automatic adoption of pipeline safety regulations. However, their civil penalties amount of \$10,000 per day up to \$250,000 does not match PHMSA's policy requirements of \$100,000/\$1 M.

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

Evaluator Notes:

A review of Attachment 10 confirm planned performance goals and accomplishments were completed. Information was helpful in understanding the current pipeline safety program.

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

Evaluator Notes:

A loss of half a point occurred in this section of the review. See questions A. 5.

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Total points scored for this section: 9.5  
Total possible points for this section: 10



## PART B - Program Inspection Procedures

Points(MAX) Score

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

Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

A review of Puerto Rico Department of Transportation and Public Works (PR DTOPW) Pipeline Safety Administrative Procedures dated January 25, 2018 found this item listed under "Activities, During and After An Inspection". It was suggested additional items be included for the before inspection. These suggested items include history of the operator, violations cited, unaccounted for gas loss from the annual report, amount of leakage and number of damages to pipelines.

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

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

A review of Puerto Rico Department of Transportation and Public Works (PR DTOPW) Pipeline Safety Administrative Procedures dated January 25, 2018 found this item listed under "Types of Inspections" Section D and "Activities, During and After An Inspection". It was suggested to refer to Appendix S in the Guidelines for States Participating in the Pipeline Safety Program for assistance in making improvements to their Administrative Procedures.

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

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

A review of Puerto Rico Department of Transportation and Public Works (PR DTOPW) Pipeline Safety Administrative Procedures dated January 25, 2018 found this item listed under "Types of Inspections, Section E" and "Activities, During and After An Inspection".

- |   |   |   |   |
|---|---|---|---|
| 4 | Damage Prevention Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|---|---|---|

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

A review of Puerto Rico Department of Transportation and Public Works (PR DTOPW) Pipeline Safety Administrative Procedures dated January 25, 2018 found this item listed under "Types of Inspections, Section G" and "Activities, During and After An Inspection".

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

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

A review of Puerto Rico Department of Transportation and Public Works (PR DTOPW) Pipeline Safety Administrative Procedures dated January 25, 2018 found this item listed under Types of Inspections, Section C.

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

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

A review of Puerto Rico Department of Transportation and Public Works (PR DTOPW) Pipeline Safety Administrative Procedures dated January 25, 2018 found this item listed under "Types of Inspections, Section B" and "Activities, During and After An Inspection".

<b>7</b>	Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? Yes = 6 No = 0 Needs Improvement = 1-5	<b>6</b>	<b>6</b>
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:**

A review of Puerto Rico Department of Transportation and Public Works (PR DTOPW) Pipeline Safety Administrative Procedures dated January 25, 2018 found these items listed under "Quantity of Inspections, Sections A thru I. Inspection units were found broken down appropriately and reviewed annually during the inspection visits.

**8 General Comments:**

Info OnlyInfo Only

Info Only = No Points

**Evaluator Notes:**

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

Total points scored for this section: 13  
Total possible points for this section: 13



## PART C - Program Performance

Points(MAX) Score

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

A. Total Inspection Person Days (Attachment 2):  
86.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
220 X 1.07 = 235.40

Ratio: A / B  
86.00 / 235.40 = 0.37

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

### Evaluator Notes:

A.Total Inspection Person Days (Attachment 2)= 86

B.Total Inspection Person Days Charged to the program(220\*Number of Inspection person years(Attachment 7)=235.4

Formula:- Ratio = A/B = 86/235.4 = 0.37

Rule:- (If Ratio  $\geq$ .38 then points = 5 else Points = 0.)

Due to Hurricane Marie that occurred on the island preventing pipeline safety inspectors in performing and meet the required number of inspection person days, Director of State Programs has modify the score to grant the full five points.

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

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

### Evaluator Notes:

a & b. Samuel Rodriquez has completed all required courses to be the lead inspector for gas and DIMP inspections. Zuleika Ruiz has completed the PL1250, PL3257 & PL3242 courses. She is waitlisted to complete the remaining four courses in CY18 & CY19.

c. Samuel Rodriquez has been waitlisted to attend the PL3600 Root Cause course in CY2019.

d. No outside training courses or seminars were attended in CY2017.

e. Yes, Samuel Rodriquez has obtained the minimum qualifications to be the lead inspector on all standard inspections.

- 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, Samuel Rodriquez has completed all required TQ courses. He has three years of experience in pipeline safety.

- 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:

Secretary Aponte designed Alice Velazquez, Executive Director, to response to Zach Barrett's letter mailed on October 20,

2017. An extension of time was requested and granted to January 1, 2018 by Zach Barrett on December 19, 2017. The response letter was mailed on December 29, 2017 and within the 60 day requirement.

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

Evaluator Notes:

Yes, they conducted a pipeline safety seminar in May 9-11, 2016. The number of participants consisting of different operators and contractors representing 343 individuals over the three day period.

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

Evaluator Notes:

No, conducted a review of files and inspection reports and found all operator types and inspection units were not inspected in accordance to written procedures as described under Administrative Procedures, Quantity of Inspections. Inspection intervals were not met due to Hurricane Marie. However, due to this event, no loss of points occurred.

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

Evaluator Notes:

Yes, PR DTOPW uses the federal forms to cover all applicable code sections of the regulations.

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

Evaluator Notes:

N/A. No cast iron pipelines in Puerto Rico.

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

Evaluator Notes:

N/A. No cast iron pipelines in Puerto Rico.

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

Evaluator Notes:

Yes, this item is reviewed with additional questions in the standard inspection form used by the inspector.

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

Yes, this item is cover in the PHMSA Standard Inspection form and reviewed with the operator.

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

Yes, the Program Manager reviews the annual reports submitted by the operators as they are received into their office. A review of files found annual reports were reviewed on April 21. No areas of concern with this question.

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

Yes, this item is reviewed and listed on the inspection form.

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

No Drug & Alcohol inspections have not been conducted due to the inspection schedule cycle. These inspections are scheduled in the next two years to meet the five year time requirement.

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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 | NA |
|-----------|---|---|----|
- 

Evaluator Notes:

No OQ inspections have not been conducted due to the inspection schedule cycle. These inspections are scheduled in the next two years to meet the five year time requirement.

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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 | NA |
|-----------|---|---|----|
- 

Evaluator Notes:

No TIMP inspections have not been conducted due to the inspection schedule cycle. A primary reviewed with one operator was conducted in CY18. The inspector and operator determined they needed more time to prepare for the inspection. Therefore, the TIMP inspections will begin in CY19.

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

Evaluator Notes:

No DIMP inspections have not been conducted due to the inspection schedule cycle. These inspections are scheduled in CY2018 to meet the five year time requirement.

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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 | NA |
|-----------|---|---|----|
-

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

No Public Awareness inspections have not been conducted due to the inspection schedule cycle. These inspections are scheduled in CY2019.

- |           |   |   |     |
|-----------|---|---|-----|
| <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 | 0.5 |
|-----------|---|---|-----|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No. The Program Manager is working with the agency's system personnel to have information about the pipeline safety program posted on their website. However, no action has been taken since last state program evaluation and improvement is needed. Therefore, a loss of half a point occurred.

- |           |  |   |    |
|-----------|--|---|----|
| <b>20</b> | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 | 1 | NA |
|-----------|--|---|----|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No safety related condition reports were issued in CY2017.

- |           |  |   |   |
|-----------|--|---|---|
| <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 item is listed and reviewed during the standard inspection with the operator.

- |           |   |   |   |
|-----------|---|---|---|
| <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 Samuel Rodriguez confirmed participation in surveys from NAPSRS and PHMSA did occurred in CY2017.

- |           |   |   |    |
|-----------|---|---|----|
| <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 | NA |
|-----------|---|---|----|

No = 0 Needs Improvement = .5 Yes = 1

Evaluator Notes:

No waivers/special permits have been issued.

- |           |  |   |   |
|-----------|--|---|---|
| <b>24</b> | Did the state attend the National NAPSRS Board of Directors Meeting in CY being evaluated? | 1 | 1 |
|-----------|--|---|---|

No = 0 Needs Improvement = .5 Yes = 1

Evaluator Notes:

No, due to Hurricane Marie the program manager was unable to attend the NAPSRS Board of Directors Meeting in Columbus, OH on September 25-29, 2017. Zach Barrett waived the deducted of one point for this question.

- |           |   |   |   |
|-----------|---|---|---|
| <b>25</b> | Discussion on State Program Performance Metrics found on Stakeholder Communication site - <a href="http://primis.phmsa.dot.gov/comm/states.htm">http://primis.phmsa.dot.gov/comm/states.htm</a> | 2 | 2 |
|-----------|---|---|---|

No = 0 Needs Improvement = 1 Yes = 2

- |    |   |                                      |                          |   |
|----|---|--------------------------------------|--------------------------|---|
| a. | Discussion of Potential Accelerated Actions (AA's) based on any negative trends | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | NTSB P-11-20 Meaningful Metrics   | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

Conducted a review of the Performance Metrics with the Program Manager. It was found information on the number of

damages per 1,000 tickets was not posted due to only one operator that had one damage. Reviewed the other metrics pertaining to the number of inspections and program performance. Program Manager is now familiar with the website and how to use the data to improve the pipeline safety program's performance.

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

Evaluator Notes:

A discussion on the number of inspection days assigned to each operator entered into the SICT may be higher than can be accomplished by current inspector staff members. Reviewed the number of days and cycle time and assisted in making a revision of several operators. The program manager has a better understanding on how to enter the information into the SICT program.

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

Evaluator Notes:

This item and question does not apply to any operators in Puerto Rico.

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- |           |  |           |           |
|-----------|--|-----------|-----------|
| <b>28</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

Evaluator Notes:

A loss of points occurred in questions C-1 & C-19 of this section of the review.

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Total points scored for this section: 32.5  
Total possible points for this section: 33



**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>3</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 type="radio"/> No <input checked="" type="radio"/> | Needs Improvement <input type="radio"/> |
| c.       | Procedures regarding closing outstanding probable violations   | Yes <input type="radio"/> No <input checked="" type="radio"/> | Needs Improvement <input type="radio"/> |

**Evaluator Notes:**

- a. This information is listed in PR DTOPW Administrative Procedures under the section entitled, Notification of a Probable Violation/Warning Letter.
- b. This information is implied but not detailed or described in the procedures. A loss of half point occurred.
- c. No written procedures were provided in the Administrative Procedure document regarding closing outstanding probable violations. A loss of half point occurred.

- |          |  |   |  |
|----------|--|---|--|
| <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 type="radio"/> No <input type="radio"/>            | Needs Improvement <input checked="" type="radio"/> |

**Evaluator Notes:**

- a. Yes, reviewed inspection reports and found letters were sent to the company officer of the private companies.
- b. Yes, they document all probable violations in the letter to the operator and follow their written procedures as described in the section entitled, Action When Probable Violations are Identified.
- c. Yes, this is listed in the section entitled, Action When Probable Violations are Identified.
- d. All probable violations are reviewed by the Program Manager quarterly.
- e. Yes, this is listed in Action When Probable Violations are identified.
- f. This item is not written in the procedures but is being followed. Improvement is needed to include this item in future revisions to the procedure document.

- |          |  |          |          |
|----------|--|----------|----------|
| <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, a review of files and inspection reports found four compliance actions were issued in CY2017. The four compliance actions were against San Juan Gas, Del Gas, Empire Gas & Santa Juanita Gas.

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

**Evaluator Notes:**

Yes, the operators were given an opportunity to meet with staff members to discuss the probable violation and determine a plan of action. No show causes were necessary to obtain compliance.

- |          |   |          |          |
|----------|---|----------|----------|
| <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) | <b>2</b> | <b>2</b> |
|----------|---|----------|----------|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, Samuel Rodriguez is familiar with imposing civil penalties. No civil penalties have been assessed in the last three years since the program moved to the Puerto Rico Department of Transportation and Public Works.

---

**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:

The pipeline safety program was transferred to the Department of Transportation and Public Works in CY2015, DTOPW has not had an opportunity to site probable violations that would warrant a civil penalty.

---

**7** General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

A loss of one point occurred in this section of the review pertaining to question D.2

---

Total points scored for this section: 14  
Total possible points for this section: 15



## PART E - Incident Investigations

Points(MAX) Score

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

Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

Yes, information is listed in PR DOTPW Administrative Procedures under sub-title, Accident Investigation. However, information is general and does not address the specific requirements on action to be taken on an incident. Improvement is needed in re-writing the procedures. Therefore, a loss of one point occurred.

- 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 notification of incidents to be reported by the operator to PR DOTPW is provided on their website. Additionally, the information is provided in a mail out to the operators. Information on MOU and Federal/State incidents is included in the Administrative Procedure document.

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

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

No incidents occurred in CY2017.

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

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

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

### Evaluator Notes:

No incidents occurred in CY2017.

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

Yes = 1 No = 0

### Evaluator Notes:

No incidents occurred in CY2017.

- 6 Did the state assist Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 1 NA

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

No incidents occurred in CY2017. However, information on potential safety related issues resulting from Hurricane Marie damage to the island was reported to the Southern Region Office during and after the hurricane by Samuel Rodriguez and Alice Velazquez.

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

Evaluator Notes:

No incidents occurred in CY2017.

- 8 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

A loss of one point occurred in this section of the review. See question E.1

Total points scored for this section: 3  
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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | NA |
|---|--|---|----|

Evaluator Notes:

The operators do not use directional drilling or boring in the construction of a new or renewed lines.

- |   |  |   |   |
|---|--|---|---|
| 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 reviewed during the standard inspection.

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

PR DTOPW Excavation/ Demolition Center has conducted several meetings with stakeholder groups in CY2017 promoting best practices for reducing damages. Program Manager does participate in the meetings.

- |   |  |   |   |
|---|--|---|---|
| 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, this information is collected and reviewed by PR DTOPW Excavation/ Demolition Center. CY 2017 found the number of damages per locate request was 7.13% for all stakeholder groups. This includes gas, water, electric, sewer & telecommunications. The number of tickets received was 1,611 in CY2017 compared to 2,381 in CY2016. The number of tickets shows a downward trend due in part to Hurricane Marie.

- |   |  |           |           |
|---|--|-----------|-----------|
| 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: 6  
Total possible points for this section: 6

## PART G - Field Inspections

Points(MAX) Score

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

Name of Operator Inspected:

Empresas de Gas Company, Inc.

Name of State Inspector(s) Observed:

Samuel Rodriguez & Zuleika Ruiz

Location of Inspection:

San Juan, Puerto Rico

Date of Inspection:

May 23-24, 2018

Name of PHMSA Representative:

Glynn Blanton, State Liaison

### Evaluator Notes:

This was a standard field inspection reviewing the meters, valves, piping, operating pressure and other components in the LPG systems located at the Mayaguez and Plaza Del Caribe malls in Puerto Rico.

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

### Evaluator Notes:

Yes, Samuel Rodriguez contacted Jose Sisco, a representative of Empresas de Gas Company, Inc. on April 19, 2018

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

### Evaluator Notes:

Yes, they used the Federal Inspection form.

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

### Evaluator Notes:

Yes, observed each inspector writing down notes on the different components at the two tank and regulator stations, individuals meter sets and main line running up and across the shopping malls to each individual customer. Good note taking and pictures were taken by each inspector.

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

### Evaluator Notes:

Yes, inspectors checked the operator's equipment before testing the valves, regulators and other equipment in the tank and regulator stations. Observed operator personnel changing pressure gauges with the inspector documenting operating pressure and work performed.

- |          |  |   |   |
|----------|--|---|---|
| <b>6</b> | Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) | 2 | 2 |
|          | Yes = 2 No = 0 Needs Improvement = 1   |   |   |

a. Procedures

☒

b. Records

☒

c. Field Activities

☒

d. Other (please comment)

☐

### Evaluator Notes:

Yes, a review of operator's written procedure manual and records were conducted on May 23 in Empire Gas Company office

located in San Juan. Observed inspectors taking down notes on the operator's procedures. A discussion about the method used to check the odorant level was reviewing and discussed. Currently, odorant is checked by a sniff test sample. The field portion of the inspection was conducted the following day.

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

Evaluator Notes:

Yes, Samuel Rodriguez has completed all required TQ courses to be a gas safety inspector. Zuleika Ruiz has completed the PL1250 and two other TQ courses. Each inspector is qualified to perform a gas safety inspection.

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

Evaluator Notes:

Yes, an exit interview was conducted immediately after the office and field inspections. Information on areas of concern were provided to the operator representatives.

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

Evaluator Notes:

No violations were found or cited. Several areas of concerns pertaining to telephone wiring over the existing gas main line & potential areas of corrosion were discussed with the operator's representatives.

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

- |    |                               |                                     |  |
|----|-------------------------------|-------------------------------------|--|
| a. | Abandonment                   | <input type="checkbox"/>            |  |
| b. | Abnormal Operations           | <input type="checkbox"/>            |  |
| c. | Break-Out Tanks               | <input type="checkbox"/>            |  |
| d. | Compressor or Pump Stations   | <input type="checkbox"/>            |  |
| e. | Change in Class Location      | <input type="checkbox"/>            |  |
| f. | Casings                       | <input type="checkbox"/>            |  |
| g. | Cathodic Protection           | <input type="checkbox"/>            |  |
| h. | Cast-iron Replacement         | <input 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 checked="" type="checkbox"/> |  |
| q. | MAOP                          | <input type="checkbox"/>            |  |
| r. | Moving Pipe                   | <input type="checkbox"/>            |  |
| s. | New Construction              | <input type="checkbox"/>            |  |
| t. | Navigable Waterway Crossings  | <input type="checkbox"/>            |  |
| u. | Odorization                   | <input type="checkbox"/>            |  |
| v. | Overpressure Safety Devices   | <input type="checkbox"/>            |  |
| w. | Plastic Pipe Installation     | <input type="checkbox"/>            |  |
| x. | Public Education              | <input type="checkbox"/>            |  |
| y. | Purging                       | <input type="checkbox"/>            |  |

- |    |                                   |                                     |
|----|-----------------------------------|-------------------------------------|
| z. | Prevention of Accidental Ignition | <input type="checkbox"/>            |
| A. | Repairs                           | <input type="checkbox"/>            |
| B. | Signs                             | <input checked="" type="checkbox"/> |
| C. | Tapping                           | <input type="checkbox"/>            |
| D. | Valve Maintenance                 | <input type="checkbox"/>            |
| E. | Vault Maintenance                 | <input type="checkbox"/>            |
| F. | Welding                           | <input type="checkbox"/>            |
| G. | OQ - Operator Qualification       | <input type="checkbox"/>            |
| H. | Compliance Follow-up              | <input type="checkbox"/>            |
| I. | Atmospheric Corrosion             | <input checked="" type="checkbox"/> |
| J. | Other                             | <input type="checkbox"/>            |

Evaluator Notes:

This was a standard LPG inspection of Empire Gas Company's facilities located in two different malls location in Puerto Rico. Each tank and regulator station was located outside in a fenced area. The inspectors verified the equipment, operating pressure, valve and regulator settings, condition of the gas main that was located on the roof level of the shopping mall. Each inspector walked the gas line checking for condition of the pipe, reviewing the supports and meter set arrangements to each individual customer.

---

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