



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

1200 New Jersey Avenue SE
Washington DC 20590

2009 Natural Gas State Program Evaluation

for

Connecticut Department of Public Utility Control

Document Legend

PART:

- O -- Representative Date and Title Information
- A -- General Program Qualifications
- B -- Inspections and Compliance - Procedures/Records/Performance
- C -- Interstate Agent States
- D -- Incident Investigations
- E -- Damage Prevention Initiatives
- F -- Field Inspection
- G -- PHMSA Initiatives - Strategic Plan
- H -- Miscellaneous
- I -- Program Initiatives



2009 Natural Gas State Program Evaluation -- CY 2009
Natural Gas

State Agency: Connecticut

Agency Status:

Date of Visit: 06/21/2010 - 06/25/2010

Agency Representative: Karl Baker

PHMSA Representative: Dino N. Rathod, P.E.

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

Name/Title: Mr Kevin M. DelGobbo, Chairman

Agency: Connecticut Department of Public Utility Control

Address: 10 Franklin Square

City/State/Zip: New Britain, CT 06051

Rating:

60105(a): Yes **60106(a):** No **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 2009 (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 certification/agreement attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART F):

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 F, the PHMSA representative should include a written summary which thoroughly documents the inspection.

Scoring Summary

PARTS

Possible Points Points Scored

A	General Program Qualifications	26	26
B	Inspections and Compliance - Procedures/Records/Performance	24.5	24.5
C	Interstate Agent States	6	6
D	Incident Investigations	5.5	5.5
E	Damage Prevention Initiatives	9	9
F	Field Inspection	12	12
G	PHMSA Initiatives - Strategic Plan	10	10
H	Miscellaneous	3	3
I	Program Initiatives	9	9

TOTALS

105

105

State Rating

100.0

PART A - General Program Qualifications

Points(MAX) Score

- | | | | |
|---|--|-------------------------------------|---|
| 1 | Did the state submit complete and accurate information on the attachments to its most current 60105(a) Certification/60106 (a) Agreement? (NOTE: PHMSA Representative to verify certification/agreement attachments by reviewing appropriate state documentation. Score a deficiency in any one area as "needs improvement". Attachment numbers appear in parenthesis) Previous Question A.1, Items a-h worth 1 point each
Yes = 8 No = 0 Needs Minor Improvement = 3-7 Needs Major Improvement = 2 | 8 | 8 |
| a. State Jurisdiction and agent status over gas facilities (1) | | <input checked="" type="checkbox"/> | |
| b. Total state inspection activity (2) | | <input checked="" type="checkbox"/> | |
| c. Gas facilities subject to state safety jurisdiction (3) | | <input checked="" type="checkbox"/> | |
| d. Gas pipeline incidents (4) | | <input checked="" type="checkbox"/> | |
| e. State compliance actions (5) | | <input checked="" type="checkbox"/> | |
| f. State record maintenance and reporting (6) | | <input checked="" type="checkbox"/> | |
| g. State employees directly involved in the gas pipeline safety program (7) | | <input checked="" type="checkbox"/> | |
| h. State compliance with Federal requirements (8) | | <input checked="" type="checkbox"/> | |

SLR Notes:

- | | | | |
|----------|---|---|---|
| 2 | Did the state have an adequate mechanism to receive operator reporting of incidents to ensure state compliance with 60105(a) Certification/60106(a) Agreement requirements (fatality, injury requiring hospitalization, property damage exceeding \$50,000 - Mechanism should include receiving "after hours" reports)? (Chapter 6) Previous Question A.2
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

Gas Pipeline Safety Unit (GPSU)- Administrative Procedures Rev 01/29/2010- Section 18 for Incident Reporting Mechanism

- | | | | |
|----------|---|---|---|
| 3 | Has the state held a pipeline safety TQ seminar(s) in the last 3 years? (NOTE: Indicate date of last seminar or if state requested seminar, but T&Q could not provide, indicate date of state request for seminar. Seminars must be held at least once every 3 calendar years.) (Chapter 8.5) Previous Question A.4
Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

CT GPSU attended and participated in a Joint T&Q- NEPSR seminar Oct 22-23, 2009 in Meridith, NH

- | | | | |
|----------|--|---|---|
| 4 | Were pipeline safety program files well-organized and accessible?(NOTE: This also includes electronic files) (Chapter 5) Previous Question A.5
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

GPSU files are kept in a secure bldg; well organized and accessible (hard copies, electronic files)

- | | | | |
|----------|---|---|---|
| 5 | Did state records and discussions with the state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? (Chapter 4.1, Chapter 8.1) Previous Question A.6
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

Phil sher was Prog Mgr till June 2009. Karl Baker was named as Acting Prog Mgr for remaining 2009. Karl Baker became permanent Program Manager. He brings in wealth of Pipeline Safety Regulatory experience. He also has completed necessary T&Q training. He has worked with ER and PHMSA closely.

- | | | | |
|----------|---|---|---|
| 6 | Did the state respond in writing within 60 days to the requested items in the Chairman's letter following the Region's last program evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

- | | | | |
|----------|--|---|---|
| 7 | What actions, if necessary, did the State initiate as a result of issues raised in the Chairperson's letter from the previous year? Did actions correct or address deficiencies from previous year's evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8/A.9
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

CT DPUC selected Karl Bkaer as a permanent replacement of Program Manager. GPSU also continues to work with LDCs for implementation of IMP.

Personnel and Qualifications

- | | | | |
|----------|--|---|---|
| 8 | Has each inspector fulfilled the 3 year TQ training requirement? If No, has the state been granted a waiver regarding TQ courses by the Associate Administrator for Pipeline Safety? (NOTE: If the State has new inspectors who have not attended all TQ courses, but are in a program which will achieve the completion of all applicable courses within 3 years of taking first course (5 years to successfully complete), or if a waiver has been granted by the applicable Region Director for the state, please answer yes.) (Chapter 4.4) Previous Question A.10
Yes = 3 No = 0 | 3 | 3 |
|----------|--|---|---|

SLR Notes:

CT DPUC maintains T&Q training requirements of pipeline inspection staff. New inspector John DePaolo has signed up for four (4) T&Q courses for FY 2011

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|----------|---|-----------|-----------|
| 9 | Brief Description of Non-TQ training Activities:
Info Only = No Points

For State Personnel:

For Operators:

For Non-Operator Entities/Parties, Information Dissemination, Public Meetings: | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

- | | | | |
|-----------|---|---|---|
| 10 | Did the lead inspectors complete all required T&Q OQ courses and Computer Based Training (CBT) before conducting OQ Inspections? (Chapter 4.4.1) Previous Question A.12
Yes = 1 No = 0 | 1 | 1 |
|-----------|---|---|---|

SLR Notes:

Per CY 2010 Certification, current GPSU staff members have completed required T&Q training for OQ

- | | | | |
|-----------|--|---|---|
| 11 | Did the lead inspectors complete all required TQ Integrity Management (IMP) Courses/Seminars and CBT before conducting IMP Inspections? (Chapter 4.4.1) Previous Question A.13
Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|

SLR Notes:

GPSU inspectors Karl, Bruce and Dan have completed IMP training. Another inspector Ed has signed up and expected to complete IMP training requirement in CY 2011

- | | | | |
|-----------|--|---|---|
| 12 | Was the ratio acceptable of Total inspection Person-days to Total Person-days charged to the program by state inspectors? (Region Director may modify points for just cause) (Chapter 4.3) Previous Question B.12
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):
342.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 3.59 = 789.80

Ratio: A / B
342.00 / 789.80 = 0.43

If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0
Points = 5 | 5 | 5 |
|-----------|--|---|---|

SLR Notes:

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- 13** Have there been modifications or proposed changes to inspector-staffing levels? (If yes, describe) Previous Info Only Info Only
Question B.13
Info Only = No Points

SLR Notes:

Phil Sher retired from DPUC in June 2009. Karl baker was named Acting Prog Mgr. GPSU also added a new Inspector John DePaolo in early June 2010.

- 14** Part-A General Comments/Regional Observations Info Only Info Only
Info Only = No Points

SLR Notes:

State of Conecticut Gas Pipeline Safety Unit (GPSU) Admin Procedures- Rev 01/29/2010. I adcussed with GPSU minor changes of procedures.

Total points scored for this section: 26
Total possible points for this section: 26



PART B - Inspections and Compliance - Procedures/Records/ Performance

Points(MAX) Score

Inspection Procedures

- 1** Does the State have a written inspection plan to complete the following? (all types of operators including LNG) (Chapter 5.1) Previous Question B.1 + Chapter 5 Changes + Incorporate LNG 6.5 6.5
Yes = 6.5 No = 0 Needs Improvement = 50% Deduction
- | | | | | |
|---|---|--------------------------------------|--------------------------|---|
| a | Standard Inspections (Including LNG) (Max points = 2) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b | IMP Inspections (Including DIMP) (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c | OQ Inspections (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d | Damage Prevention (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e | On-Site Operator Training (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f | Construction Inspections (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| g | Incident/Accident Investigations (Max points = 1) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| h | Compliance Follow-up (Max points = 1) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

SLR Notes:

Gas Pipeline Safety Unit- GPSU Admin Procedure- Rev 01//29/2010 Section 5

- 2** Did the written Procedures for selecting operators adequately address key concerns? (Chapter 5.1) Previous Question B.2, items a-d are worth .5 point each 2 2
Yes = 2 No = 0 Needs Improvement = 50% Deduction
- | | | | | |
|---|--|--------------------------------------|--------------------------|---|
| a | Length of time since last inspection | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b | History of Operator/unit and/or location (including leakage , incident and compliance history) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c | Type of activity being undertaken by operator (construction etc) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d | For large operators, rotation of locations inspected | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

SLR Notes:

Gas Pipeline Safety Unit- GPSU Admin Procedure- Rev 01//29/2010 Section 8

Inspection Performance

- 3** Did the state inspect all types of operators and inspection units in accordance with time intervals established in its written procedures? (Chapter 5.1) Previous Question B.3 2 2
Yes = 2 No = 0

SLR Notes:

Gas Pipeline Safety Unit- GPSU Admin Procedure- Rev 01//29/2010 Section 6

- 4** Did the state inspection form cover all applicable code requirements addressed on the Federal Inspection forms? (Chapter 5.1 (3)) Previous Question B.4 1 1
Yes = 1 No = 0

SLR Notes:

Gas Pipeline Safety Unit- GPSU Admin Procedure- Rev 01//29/2010 DPUC reviews inspection forms and revises, as necessary. GPSU notes date of revision and Amendment as part of Inspection Form footer

- 5** Did state complete all applicable portions of inspection forms? (Chapter 5.1 (3)) Previous Question B.5 1 1
Yes = 1 No = 0

SLR Notes:

I discussed ad suggested to GPSU to describe and provide short supplemental information in comments/ notes portion of inspection checklist /form. This should help capture necessary brief description in addition to boxes being checked. (Short concise write-up should be sufficient, as necessary.) GPSU agreed to start implementing it going forward.

- 6** Did the state initiate appropriate follow-up actions to Safety Related Condition Reports? (Chapter 6.3) Previous Question B.6 .5 NA
Yes = .5 No = 0

SLR Notes:

- | | | | |
|----------|---|----|----|
| 7 | 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) Previous Question B.7 | .5 | .5 |
| | Yes = .5 No = 0 | | |

SLR Notes:

GPSU performed O&M inspection 02/23/2009 of CNG, Reviewed exposed cast iron pipe report (Part 192.459). Operator was cited for probable violation

- | | | | |
|----------|--|----|----|
| 8 | 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) Previous Question B.8 | .5 | .5 |
| | Yes = .5 No = 0 | | |

SLR Notes:

GPSU performed O&M inspection 02/23/2009 of CNG, Reviewed surveillance of cast iron pipe report (Part 192.755).

- | | | | |
|----------|---|----|----|
| 9 | 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) Previous Question B.9 | .5 | .5 |
| | Yes = .5 No = 0 | | |

SLR Notes:

DPUC requires monthly Leak reports from LDCs (part 192.615)

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|-----------|--|---|---|
| 10 | 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? (NTSB) Previous Question B.10 | 1 | 1 |
| | Yes = 1 No = 0 | | |

SLR Notes:

GPSU performed O&M inspection , Reviewed previous incidents, 3rd party damage report (Part 192.617). GGrade 1 and 2 Leak Reports received on a Monthly Basis.

Compliance - 60105(a) States

- | | | | |
|-----------|---|---|---|
| 11 | Did the state adequately document sufficient information on probable violations? (Chapter 5.2) Previous Question B.14 | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

SLR Notes:

- | | | | |
|-----------|---|---|---|
| 12 | Does the state have written procedures to identify the steps to be taken from the discovery to the resolution of a probable violation as specified in the "Guidelines for State Participating in the Pipeline Safety Program"? (Chapter 5.1) Previous Question D(1).1 | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

SLR Notes:

GPSU Section 10-11

- | | | | |
|-----------|---|---|---|
| 13 | Does the state have written procedures to notify an operator when a noncompliance is identified as specified in the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(4)) Previous Question D(1).2 | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

SLR Notes:

GPSU Section 10

- | | | | |
|-----------|---|---|---|
| 14 | Does the state have a written procedure for routinely reviewing the progress of compliance actions to prevent delays or breakdowns of the enforcement process, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(5)) Previous Question D(1).3 | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

SLR Notes:

GPSU Section 10

15	Has the State issued compliance actions for all probable violations discovered? (Note : PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation) Previous Question D(1).4 Yes = 1 No = 0	1	1
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SLR Notes:

Per 2010 Certification-A ttachmnet 5-- 27 were issued, 12 Compliance action taken

16	Did the state follow its written procedures for reviewing compliance actions and follow-up to determine that prompt corrective actions were taken by operators, within the time frames established by the procedures and compliance correspondence, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? Previous Question D(1).5 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

GPSU Section 10

17	If compliance could not be established by other means, did state pipeline safety program staff request formal action, such as a "Show Cause Hearing" to correct pipeline safety violations? (check each states enforcement procedures) Previous Question D(1).6 No = 0 Yes = 1	1	1
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SLR Notes:

GPSU Section 10.1

18	Did the state adequately document the resolution of probable violations? (Chapter 5.1 (6)) Previous Question D(1).7 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

GPSU follow-up actions are documented.

19	Were compliance actions sent to a company officer? (manager or board member if municipal/government system) (Chapter 5.1(4)) Previous Question D(1).8 Yes = .5 No = 0	.5	.5
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SLR Notes:

Procedures per GPSU Section 10 and Appendix "I"

20	Did the compliance proceedings give reasonable due process to all parties? (check each states enforcement procedures) Previous Question D(1).9 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

GPSU Section 10.1

Compliance - 60106(a) States

21	Did the state use the current federal inspection form(s)? Previous Question D(2).1 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

22	Are results adequately documented demonstrating inspection units were reviewed in accordance with state inspection plan? Previous Question D(2).2 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

23	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.) Previous Question D(2).3 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

24	Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question D(2).4 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

25	Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(2).5 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

26	Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? Previous Question D(2).6 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

27	Part B: General Comments/Regional Observations Info Only = No Points	Info Only	NA
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SLR Notes:

Written Inspeccion Procedures Manual- Titled: State of Connecticut- Gas Pipeline Safety Unit (GPSU) Administrative Procedure Rev 1/29/2010

Total points scored for this section: 24.5
Total possible points for this section: 24.5



PART C - Interstate Agent States

Points(MAX) Score

- | | | | |
|----------|---|---|---|
| 1 | Did the state use the current federal inspection form(s)? Previous Question D(3).1
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

DPUC utilized federal inspection forms (available from PHMSA website)

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|----------|--|---|---|
| 2 | Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? Previous Question D(3).2
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

DPUC performed interstate inspection per PHMSA ER annual inspection plan (2009)

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|----------|--|---|---|
| 3 | Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? Previous Question D(3).3
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

DPUC worked closely with PHMSA ER Team Leaders

- | | | | |
|----------|---|---|---|
| 4 | 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.) Previous Question D(3).4
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

- | | | | |
|----------|--|---|----|
| 5 | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question D(3).5
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

SLR Notes:

No safety hazard conditions found in 2009

- | | | | |
|----------|--|---|---|
| 6 | Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(3).6
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

DPUC worked closely with PHMSA ER staff inspectors

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|----------|--|---|---|
| 7 | Did the state initially submit documentation to support compliance action by PHMSA on probable violations? Previous Question D(3).7
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

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|----------|---|-----------|-----------|
| 8 | Part C: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
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SLR Notes:

DPUC and PHMSA staff members work closely on intrerstate inspections

Total points scored for this section: 6
Total possible points for this section: 6

PART D - Incident Investigations

Points(MAX) Score

- | | | | |
|----------|--|---|---|
| 1 | Are state personnel following the procedures for Federal/State cooperation in case of an incident? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6.1) Previous Question E.1
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

- | | | | |
|----------|---|----|----|
| 2 | Are state personnel familiar with the jurisdictional authority and Memorandum of Understanding between NTSB and PHMSA? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6 ? Appendix D) Previous Question E.2
Yes = .5 No = 0 | .5 | .5 |
|----------|---|----|----|

SLR Notes:

- | | | | |
|----------|--|---|---|
| 3 | Did the state keep adequate records of incident notifications received? Previous Question E.3
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

- | | | | |
|----------|--|---|---|
| 4 | If an onsite investigation of an incident was not made, did the state obtain sufficient information by other means to determine the facts and support the decision not to go on-site? Previous Question E.4
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

- | | | | |
|----------|---|--------------------------------------|--|
| 5 | Were investigations thorough and conclusions and recommendations documented in an acceptable manner? Previous Question E.5, comprehensive question worth 2 points total
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| 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 where appropriate | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

SLR Notes:

DPUC prepares detailed incident investigations. Dec 2009 investigation continues pending metallurgical lab analysis report. DPUC is expected to take appropriate actions as a result of review of this report. DPUC agreed to keep me informed of progress and closing of investigation and possible actions.

- | | | | |
|----------|---|---|----|
| 6 | Did the state initiate enforcement action for violations found during any incident investigation(s)? Previous Question E.6 Variation
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

SLR Notes:

Dec 2009 investigation continues. DPUC is expected to conclude this investigation and keep me informed of progress including possible compliance/enforcement actions, if any.

- | | | | |
|----------|--|----|----|
| 7 | 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 annual report data from operators concerning incidents/accidents and investigate discrepancies) (Chapter 6) Previous Question E.7/E.8
Yes = .5 No = 0 | .5 | NA |
|----------|--|----|----|

SLR Notes:

- | | | | |
|----------|---|-----------|-----------|
| 8 | Part D: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

GPSU is investigating Dec 2009 incident. GPSU expects to complete investigation report and resolve final actions in early 2010.

Total points scored for this section: 5.5
Total possible points for this section: 5.5



PART E - Damage Prevention Initiatives

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? Previous Question B.11
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

DPUC Performed review during O&M audits. \$ LDCs uditis performed in 2009. Also state regulations, 16-345-4(a)(5), states "If the excavator is utilizing trenchless excavation, the excavator shall, if such excavation is expected to cross or encroach within the approximate location of underground facilities either horizontally or vertically, prior to the crossing or encroaching, determine the precise location of such underground facilities expected to be so crossed or encroached

- | | | | |
|----------|--|---|---|
| 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? New 2008
Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

Performed review during O&M audits. Audits of 4 LDCs 2009. This is also accomplished during normal review of one-call damages that are reported to the DPUC.

- | | | | |
|----------|---|---|---|
| 3 | Did the state encourage and promote the adoption of the Common Ground Alliance Best Practices document to its regulated companies as a means of reducing damages to all underground facilities? Previous Question A.7
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

DPUC has performed a review of the CGA Best Practices document and determined that all pertinent best practices are included in the state regulations.

- | | | | |
|----------|---|---|---|
| 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? New 2008
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

DPUC collects and evaluates this data(Damages per 1000 locate requestes).
2006 ? 4.39
2007 ? 4.26
2008 ? 4.10
2009 ? 3.21

- | | | | |
|----------|--|---|---|
| 5 | Did the state review operators' records of accidents and failures due to excavation damage to ensure causes of failure are addressed to minimize the possibility of recurrence as required by 192.617?
Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

DPUC Performed review during O&M audits. Audits of 4 LDCs performed in 2009. This is also accomplished during normal review of one-call damages that are reported to the GPSU

- | | | | |
|----------|---|-----------|-----------|
| 6 | Part E: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

Owners of Public Utilities are required by state regulations to file damage reports. DPUC is reviewing possibility of excavator formally reporting to DPUC/CBYG. This issue may be taken up in late 2010

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

PART F - Field Inspection

Points(MAX) Score

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

Name of Operator Inspected:

Norwich Public Utilities

Name of State Inspector(s) Observed:

Ed F

Location of Inspection:

Norwich

Date of Inspection:

06/22/2010

Name of PHMSA Representative:

Dino N. Rathod, P.E.

SLR Notes:

Observed GPSU inspectors Ed and Bruce perform plastic pipe installation and Critical Valve maintenance including Operator Qualification (OQ #9) Field Verification Inspection of various covered tasks

2 Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? New 2008 1 1
Yes = 1 No = 0

SLR Notes:

Norwich DPU Asst Gen Mgr Chris LaRose was present during field activities and records review at Norwich DPU office.

3 Did the inspector use an acceptable inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) Previous Question F.2 2 2
Yes = 2 No = 0

SLR Notes:

GPSU inspectors used inspection check list hard copy initially and subsequently transferred into electronic forms. I also received necessary completed copies by e-mail

4 Did the inspector thoroughly document results of the inspection? Previous Question F.3 2 2
Yes = 2 No = 0

SLR Notes:

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.) New 2008 1 1
Yes = 1 No = 0

SLR Notes:

6 What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc) New 2008 Info Only Info Only
Info Only = No Points

SLR Notes:

Plastic pipe installation and Valve Maintenance in Norwich.

7 Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) New 2008, comprehensive question worth 2 points total 2 2
Yes = 2 No = 0 Needs Improvement = 1

a. Procedures

☒

b. Records

☒

c. Field Activities/Facilities

☒

d. Other (Please Comment)

☒

SLR Notes:

Also observed OQ#9 Field verification

- | | | | |
|----------|---|---|---|
| 8 | Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Liaison will document reasons if unacceptable) Previous Question F.8
Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

GPSU inspectors are experience and completed necessary T&Q courses. Inspeicton activites wer performed well.

- | | | | |
|----------|--|---|---|
| 9 | 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) Previous Question F.10
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

GPSU inspectors conducted brief exit interviews

- | | | | |
|-----------|--|---|---|
| 10 | During the exit interview, did the inspector identify probable violations found during the inspections? Previous Question F.11
Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|

SLR Notes:

No major issues were found. Discused concern with quality of backfill above top of padded sand cover. GPSU will review to assure that LDC procedures adequately address this concern. Concern was with size of rock, asphalt chunks from street paved surface.

- | | | | |
|-----------|---|-----------|-----------|
| 11 | What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)
Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

SLR Notes:

Norwich DPU- GPSU inspector Ed Fabricki perofrmed inspection of 6 and 8-inch HDPE plastic pipe installation- Driscoe Pipe 8100 PE 3408- approx 800 ft of new pipe. He checked Dig Safe ticket validity and line locate mark outs of various utilities. He performed field verificatin of OQ#9 of covered employees. Norwich crew used tracer wire (12THHN-solid copper), yellow warning tape and 6-inch clean sand all arounf pipe. Ed also observed pipe fusion of butt joints with use of McElroy. He also verified heating iorn surface temp at various points of heating iron. Crew used Digital infrared thermometer (Westward). On site storage on grassy surface- ok. He also verified trench depth. Quality of back-fill procedures- GPSU to follow-up in O&M.
Crtical Valves- Emergency Valves
GPSU inspector Bruce Benson used inspection check list and checked procedures and selected records. Norwich performs annual maintenace of these valves. We also observed field mainteance at Fifth Street in Norwich. Bruce aslo performed OQ#9 field verification. No issues wee found. Bruce

- | | | | |
|-----------|--|-----------|-----------|
| 12 | Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)
Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

SLR Notes:

- | | | | |
|-----------|--|-------------------------------------|-----------|
| 13 | Field Observation Areas Observed (check all that apply)
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 checked="" type="checkbox"/> | |
| | i. Damage Prevention | <input type="checkbox"/> | |
| | j. Deactivation | <input type="checkbox"/> | |
| | k. Emergency Procedures | <input type="checkbox"/> | |
| | l. Inspection of Right-of-Way | <input type="checkbox"/> | |
| | m. Line Markers | <input type="checkbox"/> | |
| | n. Liaison with Public Officials | <input type="checkbox"/> | |
| | o. Leak Surveys | <input type="checkbox"/> | |

p.	MOP	<input type="checkbox"/>
q.	MAOP	<input type="checkbox"/>
r.	Moving Pipe	<input type="checkbox"/>
s.	New Construction	<input checked="" type="checkbox"/>
t.	Navigable Waterway Crossings	<input type="checkbox"/>
u.	Odorization	<input type="checkbox"/>
v.	Overpressure Safety Devices	<input type="checkbox"/>
w.	Plastic Pipe Installation	<input checked="" type="checkbox"/>
x.	Public Education	<input type="checkbox"/>
y.	Purging	<input type="checkbox"/>
z.	Prevention of Accidental Ignition	<input type="checkbox"/>
A.	Repairs	<input type="checkbox"/>
B.	Signs	<input type="checkbox"/>
C.	Tapping	<input type="checkbox"/>
D.	Valve Maintenance	<input checked="" type="checkbox"/>
E.	Vault Maintenance	<input type="checkbox"/>
F.	Welding	<input type="checkbox"/>
G.	OQ - Operator Qualification	<input checked="" type="checkbox"/>
H.	Compliance Follow-up	<input type="checkbox"/>
I.	Atmospheric Corrosion	<input type="checkbox"/>
J.	Other	<input type="checkbox"/>

SLR Notes:

14 Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

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



PART G - PHMSA Initiatives - Strategic Plan

Points(MAX) Score

Risk base Inspections - Targeting High Risk Areas

1 Does state have process to identify high risk inspection units? 1.5 1.5

Yes = 1.5 No = 0

Risk Factors (criteria) to consider may include:

Miles of HCA's, Geographic area, Population Density

Length of time since last inspection

History of Individual Operator units (leakage, incident and compliance history, etc.)

Threats - (Excavation Damage, Corrosion, Natural Forces, Other Outside Forces, Material or Welds, Equipment, Operations, Other)

SLR Notes:

DPUC Section 8 of Administrative Procedures states "Inspections are ordinarily conducted pursuant to one of the following criteria.

- (a) Routine scheduling
- (b) A complaint received from a member of the public
- (c) Information obtained from a previous inspection
- (d) Pipeline accident or incident
- (e) Whenever deemed appropriate by the DPUC

Every operator and every inspection unit is typically inspected in accordance with 6c above, with priority given to inspecting systems with greater risk potential. In determining the potential risk of a facility, the following factors may be considered.

- (a) The length of time since the last inspection.
- (b) The history of the inspection unit (leak history, unaccounted-for gas, prior non-compliances, accident/incident history, etc.).
- (c) Types of activities being undertaken by the inspection unit (construction, recent changes in personnel and procedures, etc.).
- (d) For multi-unit operators, rotation of inspection units to be inspected.
- (e) The nature of the facility (pipeline, LNG plant, propane plant)
- (f) Pressure classification (low, elevated-low, high)
- (g) Material involved (cast iron, steel, plastic)
- (h) History of the type of facility
- (i) Population density
- (j) Threats to the facilities (Excavation damage, corrosion, natural forces, other outside forces, material or welds, equipment, operations)

2 Are inspection units broken down appropriately? (see definitions in Guidelines) .5 0.5

Yes = .5 No = 0

SLR Notes:

3 Consideration of operators DIMP Plan? (if available and pending rulemaking) Info Only Info Only

Info Only = No Points

SLR Notes:

DPUC is working closely with implementation of IMP and Plan development.

4 Does state inspection process target high risk areas? .5 0.5

Yes = .5 No = 0

SLR Notes:

Also details as noted in Part Q 1

Use of Data to Help Drive Program Priority and Inspections

5 Does state use data to analyze effectiveness of damage prevention efforts in the state? (DIRT or other data, etc) .5 0.5

Yes = .5 No = 0

SLR Notes:

Approximately twice per year the damage prevention data is reviewed by DPUC to determine trends. These trends are reviewed to determine where emphasis is to be placed. These trends are also reviewed with the Call Before You Dig (CBYD) Public Awareness Committee and where appropriate, the public awareness campaigns are modified.

6 Has state reviewed data on Operator Annual reports for accuracy? .5 0.5

Yes = .5 No = 0

SLR Notes:

DPUC reviews LDC annual reports- in 2008 Southern Connecticut Gas report was ok however in 2009 error was found and DPUC had SCG revise and resubmit annual report to PHMSA. SCG submitted to PHMSA dated 6-10-2010

7	Has state analyzed annual report data for trends and operator issues?	.5	0.5
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Yes = .5 No = 0

SLR Notes:

DPUC maintains reports and reviews for trends etc. See PIPEDATA.XLS located in L:\Gaspipe\Undergrnd Facilities

8	Has state reviewed data on Incident/Accident reports for accuracy?	.5	0.5
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Yes = .5 No = 0

SLR Notes:

DPUC reviewed Dec 2009 gas incident=4-inch cast iron cracked. DPUC ordered Lab Analysis.

9	Does state do evaluation of effectiveness of program based on data? (i.e. performance measures, trends, etc.)	.5	0.5
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Yes = .5 No = 0

SLR Notes:

DPUC evaluates program using leak response time data, class 2 leak backlog data, third-party damage data and cast iron/bare steel replacement program data

10	Did the State input all operator qualification inspection results into web based database provided by PHMSA in a timely manner upon completion of OQ inspections? Previous Question B.15	.5	0.5
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Yes = .5 No = 0

SLR Notes:

in 2009 DPUC uploaded 43 OQ#9 field verification inspections and 4 OQ Plan reviews

11	Did the State submit their replies into the Integrity Management Database (IMDB) in response to the Operators notifications for their integrity management program? Previous Question B.16	.5	0.5
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Yes = .5 No = 0

SLR Notes:

DPUC does not have any intrastate IMP facilities. DPUC works closely with ER for interstate IMP inspections.

12	Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17	.5	0.5
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Yes = .5 No = 0

SLR Notes:

DPUC works with ER Team Leader and PHMSA ER/ Cyclo enters data in IMDB.

13	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? Previous Question B.18	.5	0.5
-----------	---	----	-----

Yes = .5 No = 0

SLR Notes:

All data on class 1 and 2 leaks are required to be submitted to the DPUC on a monthly basis. This data is reviewed to determine trends including any plastic pipe issues. Also, during the O&M audits, this is reviewed under 192.617

14	Has state confirmed transmission operators have submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submission?	.5	0.5
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Yes = .5 No = 0

SLR Notes:

No intrastate IMP pipeline facilities; DPUC works closely with PHMSA ER for Interstate facilities

Accident/Incident Investigation Learning and Sharing Lessons Learned

15	Has state shared lessons learned from incidents/accidents? (i.e. NAPS meetings and communications)	.5	0.5
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Yes = .5 No = 0

SLR Notes:

DPUC presented at NAPS meetings. In addition, all incident/accident reports are sent to all applicable operators in the state for their review and response to any applicable recommendations included in the report.

16	Does the State support data gathering efforts concerning accidents? (Frequency/Consequence/etc)	.5	0.5
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Yes = .5 No = 0

SLR Notes:

DPUC ensures that operators correctly file appropriate PHMSA incident forms.

17	Does state have incident/accident criteria for conducting root cause analysis?	Info Only	Info Only
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Info Only = No Points

SLR Notes:

18	Does state conduct root cause analysis on incidents/accidents in state?	Info Only	Info Only
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Info Only = No Points

SLR Notes:

19	Has state participated on root cause analysis training? (can also be on wait list)	.5	0.5
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Yes = .5 No = 0

SLR Notes:

3 DPUC inspectors completed Root Cause Analysis training in Feb 2010; 1 in March 2010.

Transparency - Communication with Stakeholders

20	Other than pipeline safety seminar does State communicate with stakeholders? (Communicate program data, pub awareness, etc.)	.5	0.5
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Yes = .5 No = 0

SLR Notes:

DPUC web page has CBYD enforcement data docketed and available to public

21	Does state share enforcement data with public? (Website, newsletters, docket access, etc.)	.5	0.5
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Yes = .5 No = 0

SLR Notes:

DPUC has weblink
www.ct.gov/dpuc

22	Part G: General Comments/Regional Observations	Info Only	Info Only
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Info Only = No Points

SLR Notes:

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

PART H - Miscellaneous

Points(MAX) Score

- | | | | |
|----------|---|----|-----|
| 1 | What were the major accomplishments for the year being evaluated? (Describe the accomplishments, NAPSR Activities and Participation, etc.)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

- 1 DPUC selected Karl Baker as a Program Manager in 2010. he was Acting Program Manager since departure of Phil Sher in June 2009.
- 2 DPUC was able to hire a new Pipeline Safety Engineer in June 2010.
3. Karl worked closely with investigation of Keen Energy, Middletown Power Plant explosion investigation- PHMSA and Chemical Safety Board

- | | | | |
|----------|--|----|-----|
| 2 | What legislative or program initiatives are taking place/planned in the state, past, present, and future? (Describe initiatives (i.e. damage prevention, jurisdiction/authority, compliance/administrative, etc.)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

1. DPUC actively working to resolve SCG related incident issues- damage prevention related issues. DPUC intends to pursue it further in consideration on possible compliance actions upon completion of metallurgical analysis and final report.
2. DPUC works actively to promote CBYD. GPSU also reviews CBYD data for repeat violations, trends and means to resolve this issue.

- | | | | |
|----------|--|----|-----|
| 3 | Any Risk Reduction Accomplishments/Projects? (i.e. Cast iron replacement projects, bare steel, third-party damage reductions, etc.)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

1. CT DPUC has cast iron and bare steel replacement program. 27 miles of mains and 2972 services replaced.
- 2 Call Before You Dig (CBYD)- 377 possible violation notices were issued in 2009 and \$68,750 civil penalty amount was assessed.

- | | | | |
|----------|--|---|---|
| 4 | Did the state participate in/respond to surveys or information requests from NAPSR or PHMSA?
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

DPUC participated in Jul30, 2009 in CGA/DIRT; Aug 11, 2009 NPRM Periodic Updates.

- | | | | |
|----------|---|----|-----|
| 5 | Sharing Best Practices with Other States - (General Program)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

DPUC shares with NAPSR and NEPSR stakeholders.

- | | | | |
|----------|---|-----------|-----------|
| 6 | Part H: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

Total points scored for this section: 3
Total possible points for this section: 3

PART I - Program Initiatives

Points(MAX) Score

Drug and Alcohol Testing (49 CFR Part 199)

- | | | | |
|----------|---|---|---|
| 1 | Has the state verified that operators have drug and alcohol testing programs?
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

In 2009 DPUC performed Drug & Alcohol inspections of LDCS (CNG, SCG, Norwich DPU and YAnkee Gas). DPUC used federal inspection form #13 for these inspections.

- | | | | |
|----------|--|----|-----|
| 2 | Is the state verifying that operators are conducting the drug and alcohol tests required by the operators program (random, post-incident, etc.)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Using Form #13 DPUC verified interview questions (Part 199.3)

- | | | | |
|----------|---|----|-----|
| 3 | Is the state verifying that any positive tests are responded to in accordance with the operator's program?
Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

DPUC verified positive tests are responded to in accordance with the operator's program.

Qualification of Pipeline Personnel (49 CFR Part 192 Subpart N)

- | | | | |
|----------|---|---|---|
| 4 | Has the state verified that operators have a written qualification program?
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

In 2009 DPUC performed 43 OQ field verification and 4 OQ Plan inspections

- | | | | |
|----------|--|----|-----|
| 5 | Has the state reviewed operator qualification programs for compliance with PHMSA rules and protocols?
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

in 2009 DPUC reviewed 4 OQ Plans and used OQ Protocols

- | | | | |
|----------|--|----|-----|
| 6 | Is the state verifying that persons who perform covered tasks for the operator are qualified in accordance with the operator's program?
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

In 2009 DPUC used OQ protocols and verified that persons who perform covered tasks for the operator are qualified in accordance with the operator's program.

- | | | | |
|----------|--|----|-----|
| 7 | Is the state verifying that persons who perform covered task for the operator are requalified at the intervals specified in the operator's program?
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

In 2009 DPUC verified that persons who perform covered task for the operator are requalified at the intervals specified in the operator's program

Gas Transmission Pipeline Integrity Management (49 CFR Part 192 Subpart O)

- | | | | |
|----------|--|---|---|
| 8 | Has the state verified that all operators with transmission pipelines have either adopted an integrity management program (IMP), or have properly determined that one is not required?
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

No intrastate pipelines in CT; DPUC works closely with PHMSA ER for Interstate Gas Transmission pipelines. DPUC used IMP Protocols.

- | | | | |
|----------|--|----|-----|
| 9 | Has the state verified that in determining whether a plan is required, the operator correctly calculated the potential impact radii and properly applied the definition of a high consequence area?
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

- | | | | |
|-----------|---|----|-----|
| 10 | Has the state reviewed operator IMPs for compliance with Subpart O? (In accordance with State Inspection plan)
Yes = .5 No = 0 | .5 | 0.5 |
|-----------|---|----|-----|

SLR Notes:

No intrastate pipelines in CT; DPUC works closely with PHMSA ER for Interstate Gas Transmission pipelines. DPUC used IMP Protocols

- | | | | |
|-----------|--|----|-----|
| 11 | Is the state monitoring operator progress on the inspections, tests and remedial actions required by the operator's IMP, including that they are being done in the manner and schedule called for in its IMP?
Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

No intrastate pipelines in CT; DPUC works closely with PHMSA ER for Interstate Gas Transmission pipelines. DPUC used IMP Protocols.
Algonquin Sept 2009; Tennessee Gas Oct 2009

- | | | | |
|-----------|--|----|-----|
| 12 | Is the state verifying that operators are periodically examining their transmission line routes for the appearance of new HCAs?
Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

No intrastate pipelines in CT; DPUC works closely with PHMSA ER for Interstate Gas Transmission pipelines. DPUC used IMP Protocols

Public Awareness (49 CFR Section 192.616)

- | | | | |
|-----------|--|----|-----|
| 13 | Has the state verified that each operator has developed a continuing public awareness program? (due date was 6/20/06 for most operators, 6/20/07 for certain very small operators, 6/13/08 for master meters)
Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

DPUC reviewed LDCs and propane operators for Public Awareness Programs

- | | | | |
|-----------|--|----|-----|
| 14 | Has the state reviewed the content of these programs for compliance with 192.616 (by participating in the Clearinghouse or by other means)?
Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

DPUC performed reviews in 2009 as a part of Standard inspection process.

- | | | | |
|-----------|--|----|-----|
| 15 | Is the state verifying that operators are conducting the public awareness activities called for in its program?
Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

- | | | | |
|-----------|---|-----------|-----------|
| 16 | Is the state verifying that operators have evaluated their Public Awareness programs for effectiveness as described in RP1162?
Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

SLR Notes:

- | | | | |
|-----------|---|-----------|-----------|
| 17 | Part I: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

SLR Notes:

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