



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

1200 New Jersey Avenue SE  
Washington DC 20590

# 2011 Natural Gas State Program Evaluation

for

Connecticut Department of Public Utility Control

## 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)



2011 Natural Gas State Program Evaluation -- CY 2011  
Natural Gas

**State Agency:** Connecticut

**Agency Status:**

**Date of Visit:** 06/05/2012 - 06/07/2012

**Agency Representative:** Karl Baker

**PHMSA Representative:** Jim Anderson

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

**Name/Title:** Arthur House, Chairman

**Agency:** Connecticut Department of Energy and Environmental Protection, Public Utilities  
Regulatory Authority

**Address:** Ten Franklin Square

**City/State/Zip:** New Britain, Connecticut 06051

**Rating:**

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

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**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 2011 (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.

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**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.

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**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	10
15	15
41	41
14	14
8	8
8	8
11	11
3	3
0	0

**TOTALS**

**110                    110**

**State Rating** .....

**100.0**

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## PART A - Progress Report and Program Documentation Review

Points(MAX) Score

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

Evaluator Notes:

Yes. All data reviewed was accurate.

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

Evaluator Notes:

Inspection days reported accurately.

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

Evaluator Notes:

Yes. Reported correctly, Attachment 1 and Attachment 3 totals match.

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

Evaluator Notes:

Yes. Information on Attachment 4 meets information listed in Pipeline Data Mart.

- |   |  |   |   |
|---|--|---|---|
| 5 | Accuracy verification of Compliance Activities - Progress Report Attachment 5 (A1e)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

Yes. Information listed was accurate.

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

Evaluator Notes:

Yes. Files kept in pipeline safety section. Some kept electronically and some kept in hard copy. Moving toward keeping records electronically.

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

Evaluator Notes:

All employee's training information listed was accurate and complete.

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

Evaluator Notes:

CT pipeline safety rules automatically adopt federal regulations.

- |   |  |   |   |
|---|--|---|---|
| 9 | List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10 (H1-3) | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Attained promotions for two (2) staff members (Engineer 1 to Engineer 2; Engineer Intern to Engineer 1) to help ensure retention of qualified staff. Obtained approval for staff to work up to 5 hours of overtime per week to ensure more "boots on the ground". Staff served on Grant Allocation/Strategic Planning Committee, Service Line Periodic Inspection Task Group (Chairman), CGA Data Committee, EFV task group, and Damage Prevention Task Group.

We are currently in the process of updating our damage prevention statutes and regulations to make them stronger.

Program initiatives:

1. Aggressively pursuing accelerated cast iron/bare steel pipe replacement
2. Minimizing backlog of Class 2 leaks - companies have mandates to not have more than 60 on backlog and one company has a mandate not to have more than 90 on backlog
3. Converting inspection forms and reference material to electronic format to decrease time spent on administrative overhead and to enhance the availability of information in the field through the use of laptops for all inspections
4. Damage prevention ? working to reduce numbers of damages through targeted advertising and educational sessions
5. Damage prevention ? Initiative thru civil penalties to reduce the number of markout error damages by companies
6. Eliminated master meters
7. Attempting to locate of jurisdictional LP Gas operators and facilities

Successfully accelerated one LDC's cast iron and bare steel replacement program from \$15 million annually to \$40 million annually, reducing the timeline from 67 years down to 15-20 years total. Currently have 432 miles of cast iron in the state.

Reduced third party damage ratios from 3.53 damages per 1000 ticket request in 2010 down to 2.85 damages per 1000 ticket request in 2011.

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**10** General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

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



## PART B - Program Inspection Procedures

Points(MAX) Score

- |          |                                      |   |   |
|----------|--------------------------------------|---|---|
| <b>1</b> | Standard Inspections (B1a)           | 2 | 2 |
|          | Yes = 2 No = 0 Needs Improvement = 1 |   |   |

Evaluator Notes:

The Administrative Procedures define what a Standard Inspection consist of in Section 5 and the inspection interval times are listed in Section 8 .

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | IMP Inspections (including DIMP) (B1b) | 1 | 1 |
|          | Yes = 1 No = 0 Needs Improvement = .5  |   |   |

Evaluator Notes:

The Administrative Procedures define what a Integrity Management Inspection consist of in Section 5 and the inspection interval times are listed in Section 8.

CT does not have any intrastate transmission lines.

- |          |                                       |   |   |
|----------|---------------------------------------|---|---|
| <b>3</b> | OQ Inspections (B1c)                  | 1 | 1 |
|          | Yes = 1 No = 0 Needs Improvement = .5 |   |   |

Evaluator Notes:

The Administrative Procedures define what a Operator Qualification Inspection consist of in Section 5 and the inspection interval times are listed in Section 8.

- |          |                                       |   |   |
|----------|---------------------------------------|---|---|
| <b>4</b> | Damage Prevention Inspections (B1d)   | 1 | 1 |
|          | Yes = 1 No = 0 Needs Improvement = .5 |   |   |

Evaluator Notes:

The Administrative Procedures define what a Damage Prevention Inspection consist of in Section 5 and the inspection interval times are listed in Section 8.

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

Evaluator Notes:

The Administrative Procedures define what a Training Inspection consist of in Section 5 and the inspection interval times are listed in Section 8.

- |          |                                       |   |   |
|----------|---------------------------------------|---|---|
| <b>6</b> | Construction Inspections (B1f)        | 1 | 1 |
|          | Yes = 1 No = 0 Needs Improvement = .5 |   |   |

Evaluator Notes:

The Administrative Procedures define what a Construction Inspection consist of in Section 5 and the inspection interval times are listed in Section 8.

- |          |  |   |   |
|----------|--|---|---|
| <b>7</b> | Incident/Accident Investigations (B1g) | 2 | 2 |
|          | Yes = 2 No = 0 Needs Improvement = 1   |   |   |

Evaluator Notes:

Conducted as needed.

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

- a. Length of time since last inspection

Yes ☒ No ☐ Needs Improvement ☐

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

Yes. Section 8 of our 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 PURA

Every operator and every inspection unit will be inspected in accordance with this section, 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 operating history of the inspection unit (leak history, unaccounted-for gas, prior non-compliances, accident/incident history, any other information available from the operator's annual reports, etc.)
- (c) Types of activities being undertaken by the inspection unit (construction, recent changes in personnel and procedures, etc.)
- (d) Locations of operators inspection units being inspected - (HCA's, Geographic area, Population Density, etc.)
- (e) Threats to the facilities (Excavation damage, corrosion, natural forces, other outside forces, material or welds, equipment, operations)
- (f) For multi-unit operators, rotation of inspection units to be inspected
- (g) The nature of the facility (pipeline, LNG plant, propane plant)
- (h) Pressure classification (low, elevated-low, high)
- (i) Material involved (cast iron, steel, plastic)
- (j) History of the type of facility
- (k) Population density

To conduct this risk ranking, intrastate operators are broken down into the following classes: private and municipal distribution, LNG and propane distribution. Within each class, the reviews of items (a) through (j) above have to date resulted in a similar risk potential among the operators. This risk potential review is conducted during each of our staff meetings, based on the most currently available information from both the operators and the industry as a whole. Any findings from these staff meeting reviews will be used to update our inspection program, if necessary.

Inspection units are broken down according to the "Guidelines for States Participating in the Pipeline Safety Program".

Have a copy of Administrative Procedures.

**9 General Comments:**

Info Only Info Only

Info Only = No Points

**Evaluator Notes:**

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

## PART C - Program Performance

Points(MAX) Score

- 1 Was ratio of Total Inspection person-days to total person days acceptable? (Director of State Programs may modify with just cause) Chapter 4.3 (A12) 5 5  
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):  
399.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
220 X 4.64 = 1020.07

Ratio: A / B  
399.00 / 1020.07 = 0.39

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

### Evaluator Notes:

CT met the required although one inspector was out for about 6 months do to and automobile accident.

- 2 Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines for requirements) Chapter 4.4 (A8-A11, G19) 5 5  
Yes = 5 No = 0 Needs Improvement = 1-4

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

### Evaluator Notes:

Each staff inspector has completed all required core TQ training within the required timeframe. In addition Karl Baker, Bruce Benson and Daniel Nivison have received OQ, DIMP/IMP and Root Cause training. Edward Fabrycki has received OQ, DIMP, Root Cause and all but one IMP course. John DePaolo has been in the program since June 2010, has recently completed all require core courses and will be scheduled for additional courses as they become available.

- 3 Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1 (A5) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

Yes. Karl Baker has been with the program for about 20 years and is very knowledgeable.

- 4 Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1 (A6-7) 2 NA  
Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

No response was requested.

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

### Evaluator Notes:

Yes. October 2011 and in May 2011 a propane seminar was held.

- 6 Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1 (B3) 5 5  
Yes = 5 No = 0 Needs Improvement = 1-4

### Evaluator Notes:

Yes. Have copy of data.

7	Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1 (B4-5) Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

Yes. CT uses the federal inspection forms.

8	Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Chapter 5.1 (B7) Yes = 1 No = 0	1	1
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Evaluator Notes:

Yes. Question is on federal form, reviewed inspection reports and saw the question answered.

9	Did the state review operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance) (NTSB) Chapter 5.1 (B8) Yes = 1 No = 0	1	1
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Evaluator Notes:

Yes. Question is on federal form, reviewed inspection reports and saw the question answered.

10	Did the state review operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21? (NTSB) Chapter 5.1 (B9) Yes = 1 No = 0	1	1
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Evaluator Notes:

Yes. Question is on federal form, reviewed inspection reports and saw the question answered.

11	Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 192.617? Chapter 5.1 (B10,E5) Yes = 1 No = 0	1	1
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Evaluator Notes:

Yes. Performed review during O&M audits. Last audits performed on 3 LDCs and Norwich Public Utilities in 2007, 2009 and 2011. This is also accomplished during normal review of one-call damages that are mandatorily reported to the GPSU. Dan Nivison reviews the data.

12	Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues? Data Initiative (G6-9,G16) Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

Yes, we review and analyze Operator Annual Reports (see PIPEDATA.XLS located in L:\Gaspipe\Undergrnd Facilities).

As part of the investigation of incidents/accidents, CT reviews incident/accident data for accuracy and ensure that operators correctly file appropriate PHMSA incident forms.

CT evaluates their program effectiveness and check for operator issues and trends by using leak response time data, class 2 leak backlog data, third-party damage data and cast iron/bare steel replacement program data.



- 13 Did state input all applicable OQ, IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1 (G10-12) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, CT have uploaded all applicable OQ inspection results into the federal database in a timely manner.

There were no IMP Operator notifications for calendar year 2011.

There are no intrastate transmission lines in Connecticut. For interstate operators, the PHMSA team leaders are responsible for uploading this data for team inspections and CT uploads data for inspections where we are lead. There were no IMP inspections to upload in 2011.

- 14 Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission? (G14) 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No intrastate transmission lines in Connecticut. CT has not been asked by PHMSA, as part of annual interstate inspection plan, to review this data for interstate operators. At request from Zach Barrett to NAPS, CT reviewed interstate operator data on PHMSA website, comparing annual report data to NPMS data.

- 15 Is the state verifying operators are conducting drug and alcohol tests as required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199 (I1-3) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, annual field inspections are performed on all intrastate operators that are required to have the program (see inspection database for dates of inspections). In addition, an annual review of the Drug and Alcohol Testing MIS Data Collection forms is performed. Verification is made that any positive tests are responded to in accordance with the operator's program.

- 16 Is state verifying operators OQ programs are up to date? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals determined in the operators plan. 49 CFR 192 Part N (I4-7) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. Both headquarters, Protocols 1 through 8, and field, Protocol 9, inspections have been performed on all intrastate operators. In addition, on new construction, welding and joining OQ qualifications are being reviewed.

- 17 Is state verifying operator's gas transmission integrity management programs (IMP) are up to date? This should include a previous review of IMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart O (I8-12) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

No intrastate transmission lines in Connecticut.

GPSU has taken part in IMP inspections of interstate operators as part of our interstate annual inspection plan.

None in 2011, but will have some in 2012.

- 18 Is state verifying operator's gas distribution integrity management Programs (DIMP)? Info OnlyInfo Only  
This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart P  
Info Only = No Points

Evaluator Notes:

CT has started communicating with operators on the DIM programs. Had 4 DIMP inspection days in 2011.

- |           |   |   |   |
|-----------|---|---|---|
| <b>19</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. 49 CFR 192.616 (I13-16)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

Yes. Performed review during O&M audits. Last O&M audits performed in 2007, 2009 and 2011. In addition, PAPEE audits have been performed on all LDCs and Norwich Public Utilities is scheduled in 2012.

- |           |   |   |   |
|-----------|---|---|---|
| <b>20</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). (G20-21)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes. Communications occur with all operators on a regular basis. CT attends and communicates information at Call Before You Dig Board of Directors meetings and Public Awareness meetings. CT attends and provides training at operator training sessions with local officials including fire departments. CT participates in the Northeast Gas Association CT Advisory Group meetings as well. PURA maintains a website that has access to all docketed matters which include all pipeline safety and One-Call enforcement proceedings. Press releases issued to local media for more notable One-Call enforcement cases.

- |           |  |   |    |
|-----------|--|---|----|
| <b>21</b> | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 (B6)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|-----------|--|---|----|

Evaluator Notes:

- |           |   |   |   |
|-----------|---|---|---|
| <b>22</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? (G13)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

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

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

Evaluator Notes:

Yes. Reviewed several surveys.

- |           |  |           |           |
|-----------|--|-----------|-----------|
| <b>24</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

Evaluator Notes:

Total points scored for this section: 41  
Total possible points for this section: 41

## PART D - Compliance Activities

Points(MAX) Score

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

Evaluator Notes:

Yes. They are in Sections 10-13 of GPSU's Administrative Procedures.

- 2 Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1 (B11,B18,B19) 4 4  
Yes = 4 No = 0 Needs Improvement = 1-3
- a. Were compliance actions sent to company officer or manager/board member if municipal/government system? Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

Yes. Looked at Southern Connecticut Gas Company. Looked at Yankee Gas, Connecticut Natural Gas and Norwich O&M and follow up letters.

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

Evaluator Notes:

Yes.

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

Evaluator Notes:

Yes. This information was included in the noncompliance letters.

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

Evaluator Notes:

Yes.

- 6 Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations? (new question) Info Only Info Only  
Info Only = No Points

Evaluator Notes:

Last fine was in 2007. Do not believe any noncompliances since metit fines. Have fined operators under the Damage Prevention Law.

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

Evaluator Notes:

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

## PART E - Incident Investigations

Points(MAX) Score

- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? And did state keep adequate records of Incident/Accident notifications received? Chapter 6 (A2,D1-3)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2   | 2                                       |
| a.       | Acknowledgement of MOU between NTSB and PHMSA (Appendix D)  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b.       | Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E)  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

CT has 2-3 inspectors on call each week. Operators call Karl Baker's cell phone and he contacts on-call inspectors for dispatching them to an incident.

- |          |   |   |   |
|----------|---|---|---|
| <b>2</b> | If onsite investigation was not made, did state obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 (D4)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Yes. All leaks from gas operators reported to PURA.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? (D5)<br>Yes = 3 No = 0 Needs Improvement = 1-2 | 3   | 3                                       |
| a.       | Observations and document review   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b.       | Contributing Factors   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c.       | Recommendations to prevent recurrences when appropriate  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

Only one in 2011. It was caused by snow being removed from a building roof and pushed onto a meter set shearing off the service regulator causing a fire at the electrical control panel inside the building.  
Reviewed report

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

Evaluator Notes:

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

Evaluator Notes:

CT responded to PHMSA's Eastern Region request. Reviewed emails sent back and forth.

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

Evaluator Notes:

Yes, CT incidents/accidents have been presented at NAPS Region meetings and pipeline safety seminars. 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.

7 General Comments:

Info Only = No Points

Evaluator Notes:

Info OnlyInfo Only

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



## PART F - Damage Prevention

Points(MAX) Score

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

Evaluator Notes:

Yes, performed review during O&M audits. Last audits performed on 3 LDCs and Norwich in 2007, 2009 and 2011. Also state regulation, 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."

Question is on federal inspection form which CT uses.

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

Evaluator Notes:

Yes, performed review during O&M audits. Last audits performed on 3 LDCs and Norwich in 2007, 2009 and 2011. This is also accomplished during normal review of One-Call damages that are reported to the GPSU.

- |   |   |   |   |
|---|---|---|---|
| 3 | Did the state encourage and promote practices for reducing damages to all underground facilities to its regulated companies? (i.e. such as promoting/adopting the CGA Best Practices encouraging adoption of the 9 Elements, etc.) (E3)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

The GPSU has performed a review of the CGA Best Practices document and determined that all pertinent best practices are included in the state regulations. CT is currently working on revising their underground damage prevention laws and are reviewing the CGA Best Practices to see if they can strengthen their program. The state program has adopted the 9 elements.

- |   |  |   |   |
|---|--|---|---|
| 4 | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests? (This can include DIRT and other data shared and reviewed by the pipeline safety program) (E4,G5)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, the GPSU collects and evaluates this data.

Ticket ratio per 1000 ticket request

2006 ? 4.39 total

2007 ? 4.26 total

2008 ? 4.10 total

2009 ? 3.21 total

2010 ? 3.53 total; 1.73 gas operators only

2011 ? 2.84 total; 1.46 gas operators only

Approximately twice per year the damage prevention data is reviewed 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 Public Awareness Committee and where appropriate, the public awareness campaigns are modified.

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

Evaluator Notes:

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

## PART G - Field Inspections

Points(MAX) Score

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

Name of Operator Inspected:

Yankee Gas Company and Pioneer Gas (LP)

Name of State Inspector(s) Observed:

Dan Nivison (Yankee Gas) and Bruce Benson (Pioneer Gas)

Location of Inspection:

Yankee Gas - Naugatuck and Pioneer - Seymour

Date of Inspection:

June 6, 2012

Name of PHMSA Representative:

Jim Anderson

Evaluator Notes:

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

Evaluator Notes:

Yes for Yankee Gas and No for Pioneer Gas (Pioneer facility only had 6 meters (4 active) at a strip mall locaton.

- 3 Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) (F3) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. Have copy of both.

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

Evaluator Notes:

Yes.

- 5 Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps,pyrometer,soap spray,CGI,etc.) (F5) 1 1  
Yes = 1 No = 0

Evaluator Notes:

Yes.

- 6 Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) (F7) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

a. Procedures ☒

b. Records ☒

c. Field Activities ☒

d. Other (please comment) ☐

Evaluator Notes:

Checked joining procedures, checked OQ of contract employees, and plastic pipe installation.

- 7 Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) (F8) 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes.

- |   |  |   |   |
|---|--|---|---|
| 8 | Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) (F9)<br>Yes = 1 No = 0 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

Yes. A plimarnary exit for the days inspection. Construction project was not complete.

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

Evaluator Notes:

- |    |  |           |           |
|----|--|-----------|-----------|
| 10 | General Comments: What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) Other.<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 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 checked="" 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 checked="" type="checkbox"/> |  |
| x. | Public Education                  | <input type="checkbox"/>            |  |
| y. | Purging                           | <input type="checkbox"/>            |  |
| z. | Prevention of Accidental Ignition | <input type="checkbox"/>            |  |
| A. | Repairs                           | <input type="checkbox"/>            |  |
| B. | Signs                             | <input type="checkbox"/>            |  |
| C. | Tapping                           | <input type="checkbox"/>            |  |
| D. | Valve Maintenance                 | <input type="checkbox"/>            |  |
| E. | Vault Maintenance                 | <input type="checkbox"/>            |  |
| F. | Welding                           | <input type="checkbox"/>            |  |



- G. OQ - Operator Qualification
- H. Compliance Follow-up
- I. Atmospheric Corrosion
- J. Other

☐  
☐  
☐  
☐

Evaluator Notes:

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



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

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

Evaluator Notes:

Yes.

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

Evaluator Notes:

Yes. Have a copy of spreadsheet used to document workload and communication with PHMSA Eastern Region.

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

Evaluator Notes:

Yes. Spreadsheet dates are withing timeframe.

- |          |  |   |    |
|----------|--|---|----|
| <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.) (C4)<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? (C5)<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? (C6)<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? (C7)<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: 3  
Total possible points for this section: 3

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

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

Evaluator Notes:  
NA

- |          |  |   |    |
|----------|--|---|----|
| <b>2</b> | Are results documented demonstrating inspection units were reviewed in accordance with state inspection plan? (B22)<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? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) (B23)<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? (B24)<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? (B25)<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? (B26)<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