



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

1200 New Jersey Avenue SE
Washington DC 20590

2012 Natural Gas State Program Evaluation

for

CT Dept of Energy and Env Protection

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)

2012 Natural Gas State Program Evaluation -- CY 2012
Natural Gas

State Agency: CT
Agency Status:
Date of Visit: 06/10/2014 - 06/14/2013
Agency Representative: Karl Baker
PHMSA Representative: Patrick Gaume
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

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 2012 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. A deficiency in any one part of a multiple part question should be scored as needs improvement. Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual progress report attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART G):

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

Scoring Summary

PARTS		Possible Points	Points Scored
A	Progress Report and Program Documentation Review	10	10
B	Program Inspection Procedures	15	15
C	Program Performance	40	40
D	Compliance Activities	15	15
E	Incident Investigations	8	8
F	Damage Prevention	8	8
G	Field Inspections	12	12
H	Interstate Agent State (If Applicable)	3	3
I	60106 Agreement State (If Applicable)	0	0
TOTALS		111	111
State Rating			100.0

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

1	Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1 (A1a) Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: A1. Yes. All data reviewed was accurate and consistent with Attachments 3 & 8			
2	Review of Inspection Days for accuracy - Progress Report Attachment 2 (A1b) Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: A2. Yes, Inspection days were reported accurately and were in agreement with the Inspection Tracking spreadsheet & the Inspection Records database.			
3	Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3 (A1c) Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: A3. Yes, is consistent with Attachment 1 and the Inspection Records database.			
4	Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4 (A1d) Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: A4. Yes, One interstate incident was reported and is consistent with Pipeline Data Mart.			
5	Accuracy verification of Compliance Activities - Progress Report Attachment 5 (A1e) Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: A5. Yes. Information listed was accurate.			
6	Were pipeline program files well-organized and accessible? - Progress Report Attachment 6 (A1f, A4) Yes = 2 No = 0 Needs Improvement = 1	2	2
Evaluator Notes: A6. Yes. Files kept in pipeline safety section. Some kept electronically and some kept in hard copy. Official files are now electronic with the paper files being kept in the office.			
7	Was employee listing and completed training accurate and complete? - Progress Report Attachment 7 (A1g) Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: A7. Yes, the TQ imported records are in agreement with the CT Training database.			
8	Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8 (A1h) Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: A8. Yes, 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:

A9. Yes. Planned Performance: -- Further accelerate cast-iron and bare steel replacement across all operators. Achieve 100% score on PHMSA evaluation of our state program. Reduce damages due to mismark and bad records.

Past Performance: -- Performed DIMP inspections to ensure adequate cast iron and bare steel pipe replacement programs. Working with 2 companies to ensure next rate case filings will include appropriate capital expenditures for cast iron and bare steel pipe replacement. Received 100% score for 2011 PHMSA program audit and believe that we have performed successfully again in 2012 to receive another 100% score. Third party damages (all utilities) increased from 2.8 in 2011 to 3.0 in 2012. Third party damages (gas utilities only) increased from 1.5 in 2011 to 1.7 in 2012. This disturbing trend was recognized and measures such as increased scrutiny and civil penalties were employed to reduce damages. These additional measures will continue in 2013.

10 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

A10. PHMSA recognizes the vigorous support the Commission has given to the Pipeline Safety Program. The promotions awarded and the overtime authorized for the Pipeline Safety staff during 2012 are specifically noted.

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

PART B - Program Inspection Procedures

Points(MAX) Score

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

B1. Yes. The Administrative Procedures define what a Standard Inspection consists of in Section 5 and the inspection interval times are listed in Section 8.

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

Evaluator Notes:

B2. Yes, CT performs TIMP assignments as assigned from the Eastern Region, and also performs DIMP inspections; See Administrative Procedures Section 5 & Section 8.

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

Evaluator Notes:

B3. Yes; The Administrative Procedures define what an Operator Qualification Inspection consists of in Section 5 and the inspection interval times are listed in Section 8. Review of the OQ database indicates that there has been no OQ inspection of State Line Propane. What has actually happened is that State Line Propane has been cited for failure to have an OQ Plan. OQ re-inspection will occur before the end of 2013.

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

Evaluator Notes:

B4. Yes, is part of the Standard Inspection.

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

Evaluator Notes:

B5. Yes. The Administrative Procedures define what a Training Inspection consists of in Section 5 and the inspection interval times are listed in Section 8.

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

B6. Yes. The Administrative Procedures define what a Construction Inspection consists of in Section 5 and the inspection interval times are listed in Section 8.

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

B7. Yes. The Administrative Procedures define what a Construction Inspection consists of in Section 5 and the inspection interval times are listed in Section 8 & 18.

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

- | | | | |
|--|--------------------------------------|--------------------------|---|
| a. Length of time since last inspection | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. Type of activity being undertaken by operators (i.e. construction) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

- d. Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc) Yes ☒ No ☐ Needs Improvement ☐
- e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors) Yes ☒ No ☐ Needs Improvement ☐
- f. Are inspection units broken down appropriately? Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

B8. Yes. It is well discussed in The Administrative Procedures in Section 8.

9 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

It is CT DEEP practice to inspect every Unit every year for some type of inspection. A major goal that started in 2010 was to identify jurisdictional LPG operators, and this effort will continue for many years.

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):
376.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 3.80 = 836.00

Ratio: A / B
376.00 / 836.00 = 0.45

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

Evaluator Notes:

C1. Yes, A=376 person-days, B=3.8person-years*220 pd/py, A/B=0.45, okay.

- 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:

C2. Yes. 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 required 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:

C3. 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:

C4. NA. No response was required (100 score) .

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

Evaluator Notes:

C5. Yes, Oct 10-11, 2012, Mystic, CT; Also Oct, 2011 & May, 2011(propane Seminar).

- 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:

C6. Yes. The records are in the Inspection Database.

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
Evaluator Notes: C7. Yes, CT uses their Forms that include the Current Fed Forms and are supplemented as needed to include NTSB requirements and State Regulations. The Revised Federal Forms are reviewed annually by the Program Manager & his staff and the inspections are updated as needed.			
8	Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Chapter 5.1 (B7) Yes = 1 No = 0	1	1
Evaluator Notes: C8. 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
Evaluator Notes: C9. 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
Evaluator Notes: C10. 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
Evaluator Notes: C11. Yes. Performed review during O&M audits. Last audits performed on 3 LDCs and Norwich Public Utilities in 2007, 2009, 2011 and 2013. 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
Evaluator Notes: C12. Yes, CT reviews and analyzes Operator Annual Reports (see PIPEDATA.XLS located in L:\Gaspipe\Undergnd Facilities). As part of the investigation of incidents/accidents, CT reviews incident/accident data for accuracy and ensures that operators correctly file appropriate PHMSA incident forms. CT evaluates their program effectiveness and checks 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:

C13. Yes, CT has uploaded all applicable OQ inspection results into the federal database in a timely manner. There were no IMP Operator notifications for calendar year 2012. 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 they are lead. There were 7 GIMP interstate Field inspections that were uploaded by CT in 2012.

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

Evaluator Notes:

C14. NA ?no intrastate transmission in CT. CT HAS reviewed this with interstate operators per PHMSA-State Program request in 2012. Found minor labeling problems that were corrected.

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| 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:

C15. 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.

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| 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:

C16. 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. Review of the OQ database indicates that there has been no OQ inspection of State Line Propane. What has actually happened is that State Line Propane has been cited for failure to have an OQ Plan. OQ re-inspection will occur before the end of 2013.

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

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

C17. NA - No intrastate transmission lines in Connecticut. CT has taken part in IMP inspections of interstate operators as part of their interstate annual inspection plan. 7 IMP Field inspections (interstate) were performed as assigned in 2012.

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

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

C18. Yes, CT started DIMP inspections in 2012. All 3 LDCs and the 1 Municipal operators were done. The LPG operators were started in 2013.

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| 19 | Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. 49 CFR 192.616 (I13-16)
PAPEI Effectiveness Inspections should be complete by December 2013 | 2 | 2 |
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Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

C19. Yes. Performed review during O&M audits. Last O&M audits performed in 2007, 2009 and 2011. In addition, PAPEI audits have been performed on all LDCs and Norwich Public Utilities in 2012.

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

Evaluator Notes:

C20. 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. As a member of NEPSR, the Safety Seminars are being done annually not only once every 3years as required.

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

C21. NA. no SRCR in 2012. Practice is to follow up quickly when they happen.

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

Evaluator Notes:

C22. Yes, all data on class 1 and 2 leaks are required to be submitted to CT 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.

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

C23. Yes, CT is very responsive to NAPSR, NEPSR & PHMSA.

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| 24 | General Comments:
Info Only = No Points | | Info OnlyInfo Only |
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Evaluator Notes:

C24. CT has been successful in hiring and holding engineers in its pipeline safety program. Credit goes to competitive salaries, a beautiful State, and a supportive Commission.

Total points scored for this section: 40
Total possible points for this section: 40

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

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

Evaluator Notes:

D1. Yes. They are in Sections 10-13 of CT DEEP GPSU's Administrative Procedures.

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

Evaluator Notes:

D2. Yes, reviewed files 2012-02-01-beb-pco-comp proc rec Stratford; 2012-02-15-dhn-cng-pap; 2012-03-12-epf-cng-comp proc rec; & 2012-08-10-jpd-unc-lp-unc, Groton, 195 Leonard Dr, SE CT business complex. All were internally consistent.

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

D3. Yes, 39 letters that addressed the 224 PV.

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

D4. Yes, Due Process is explained in Admin Procedures Sections 10-12, and this information is included in noncompliance letters.

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

D5. Yes, Karl is staying within the penalty guidelines, but is using civil penalties more frequently than the previous Program Manager.

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

D6. Yes, 39 Violations letters, 3 had civil penalties for \$105K assessed and \$75K collected. The \$30K is pending & expected to be collected in 2013.

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

Evaluator Notes:

D7. 2012 was the start of a policy change to issue more frequent civil penalties.

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

PART E - Incident Investigations

Points(MAX) Score

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

Evaluator Notes:

E1. Yes. 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.

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

Evaluator Notes:

E2. YES, In 20 years, EVERY reportable incident has been investigated on-site. In addition many leaks are investigated on-site.

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| 3 | Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? (D5)
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:

E3. Yes, the one (interstate) incident was thoroughly documented and reported per the CT IA agreement.

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

Evaluator Notes:

E4. NA. the one incident had no violations found.

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

Evaluator Notes:

E5. Yes. CT responds and investigates ALL reportable incidents per their IA agreement.

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

Evaluator Notes:

E6. Yes, CT incidents/accidents have been presented at NAPSRR 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.

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

Info Only = No Points

Evaluator Notes:

E7. Reportable incidents are few in number and rarely if ever cause injury or death. Everyone hopes that this trend will continue.

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

Evaluator Notes:

F1. Yes.

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

Evaluator Notes:

F2. Yes, performed review during O&M audits. Last audits performed on 3 LDCs and Norwich in 2007, 2009, 2011 and 2013. This is also accomplished during normal review of One-Call damages that are reported to the CT DEEP GPSU.

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

Evaluator Notes:

F3. 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.

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

Evaluator Notes:

F4. 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
2012 3.0 total; 1.7 gas operators only

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

Evaluator Notes:

F5. The uptick in damages per thousand has caused an effort to streamline the issuing and collection of civil penalties. CT is focused on having all parties obey all aspects of the One Call Law.

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 Services Company OPID 24015 and CT Natural Gas Corp. OPID 2700

Name of State Inspector(s) Observed:

Edward P. Fabrycki, Jr. (Yankee Gas) and Dan Nivison (CT Natural Gas)

Location of Inspection:

Yankee Gas - Cheshire and CT Nat Gas - East Hartford

Date of Inspection:

June 11-12, 2012

Name of PHMSA Representative:

Patrick Gaume

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:

G2. Yes, Operator's representative, contract inspector, & contract crew were on site.

- 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:

G3. Yes, Both the State & Federal Forms.

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

Evaluator Notes:

G4. Yes. It was a construction project to install a 6" PE main that was well designed and well executed.

- 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:

G5. Yes, PE fusing equipment ? hydraulic fusing machine, heater plate, heater plate holder, pyrometer, temperature cards, work order package, level, back hoe, hand tools, PPE, fire extinguisher, first aid kit, etc.

- 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:

G6. Yes, I observed a Field construction activity. The onsite records and procedures were in order, available, & complete, and the work was being done in a safe and efficient manner.

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

Evaluator Notes:

G7. Yes, Ed demonstrated a professional level of knowledge while inspecting this construction activity.

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

Evaluator Notes:

G8. Yes, for the day's work only, the day's work had been appropriately performed, consistent with company standards, and safety regulations. No violations were observed. The tee section construction was meticulously well done.

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

Evaluator Notes:

G9. Yes, for the day's work only, the day's work had been appropriately performed, consistent with company standards, and safety regulations. No violations were observed. The tee section construction was meticulously well done.

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

- | | | |
|----|-----------------------------------|-------------------------------------|
| a. | Abandonment | <input checked="" type="checkbox"/> |
| b. | Abnormal Operations | <input type="checkbox"/> |
| c. | Break-Out Tanks | <input type="checkbox"/> |
| d. | Compressor or Pump Stations | <input type="checkbox"/> |
| e. | Change in Class Location | <input type="checkbox"/> |
| f. | Casings | <input type="checkbox"/> |
| g. | Cathodic Protection | <input type="checkbox"/> |
| h. | Cast-iron Replacement | <input type="checkbox"/> |
| i. | Damage Prevention | <input checked="" type="checkbox"/> |
| j. | Deactivation | <input type="checkbox"/> |
| k. | Emergency Procedures | <input checked="" type="checkbox"/> |
| l. | Inspection of Right-of-Way | <input type="checkbox"/> |
| m. | Line Markers | <input type="checkbox"/> |
| n. | Liaison with Public Officials | <input checked="" 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 checked="" type="checkbox"/> |
| A. | Repairs | <input checked="" type="checkbox"/> |
| B. | Signs | <input checked="" type="checkbox"/> |
| C. | Tapping | <input type="checkbox"/> |

- | | | |
|----|-----------------------------|-------------------------------------|
| D. | Valve Maintenance | <input type="checkbox"/> |
| E. | Vault Maintenance | <input type="checkbox"/> |
| F. | Welding | <input checked="" type="checkbox"/> |
| G. | OQ - Operator Qualification | <input checked="" type="checkbox"/> |
| H. | Compliance Follow-up | <input type="checkbox"/> |
| I. | Atmospheric Corrosion | <input type="checkbox"/> |
| J. | Other | <input type="checkbox"/> |

Evaluator Notes:

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

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

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

Evaluator Notes:

H1. Yes.

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

Evaluator Notes:

H2. Yes. Reviewed the PHMSA-ER State Tracking spreadsheet which shows CT to be in compliance with its IA obligations.

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

Evaluator Notes:

H3. Yes. Spreadsheet dates are within timeframe.

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

Evaluator Notes:

H4. NA - there were none in 2012.

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

Evaluator Notes:

H5. NA - there were none in 2012.

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

Evaluator Notes:

H6. NA - there were none in 2012.

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

Evaluator Notes:

H7. NA - there were none in 2012.

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

Evaluator Notes:

H8. CT sees value in being an IA. The interstate Operators in CT were found to be in compliance with the inspected for regulations.

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

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

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

Evaluator Notes:

I.1-7, NA. Not a 60106 State Program Partner.

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

Evaluator Notes:

I.1-7, NA. Not a 60106 State Program Partner.

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

Evaluator Notes:

I.1-7, NA. Not a 60106 State Program Partner.

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

Evaluator Notes:

I.1-7, NA. Not a 60106 State Program Partner.

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

Evaluator Notes:

I.1-7, NA. Not a 60106 State Program Partner.

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

Evaluator Notes:

I.1-7, NA. Not a 60106 State Program Partner.

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

Evaluator Notes:

I.1-7, NA. Not a 60106 State Program Partner.

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