



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

1200 New Jersey Avenue SE  
Washington DC 20590

# 2018 Gas State Program Evaluation

for

MA DEPT. OF PUBLIC UTILITIES

## 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)



# 2018 Gas State Program Evaluation -- CY 2018

## Gas

**State Agency:** Massachusetts

**Rating:**

**Agency Status:**

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

**Date of Visit:** 03/11/2019 - 04/18/2019

**Agency Representative:** Richard Wallace, Director

**PHMSA Representative:** Don Martin

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

**Name/Title:** Matthew H. Nelson, Chairman

**Agency:** Massachusetts Department of Public Utilities

**Address:** One South Station

**City/State/Zip:** Boston, MA 02110

### 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 2018 (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.

### Scoring Summary

PARTS	Possible Points	Points Scored
A Progress Report and Program Documentation Review	10	10
B Program Inspection Procedures	13	13
C Program Performance	47	47
D Compliance Activities	15	11
E Incident Investigations	10	10
F Damage Prevention	8	8
G Field Inspections	12	12
H Interstate Agent State (If Applicable)	0	0
I 60106 Agreement State (If Applicable)	0	0
<b>TOTALS</b>	<b>115</b>	<b>111</b>
<b>State Rating</b> .....		<b>96.5</b>



# PART A - Progress Report and Program Documentation Review

Points(MAX) Score

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

Evaluator Notes:

Information was reviewed in PHMSA's Pipeline Data Mart (PDM). The PDM information was compared to the operator and unit information in Attachment 1. No issues were identified after discussion with the MADPU.

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

Evaluator Notes:

Information generated from the MADPU's inspection database was downloaded into a spreadsheet. The summation of inspection person days from the spreadsheet verified the inspection person days in Attachment 2. Some consolidation of inspection types was required to match the totals in Standard Inspections Column. It should be noted that 288 inspection person days in the Private Distribution/Standard Inspection entry was attributed to inspection activities of inspectors from other state programs in support of the Merrimack Valley Reconstruction Project.

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

Evaluator Notes:

The information in Attachment 3 was compared to information contained in the MADPU's database. No errors were found. The unit totals in Attachment 3 match those in Attachment 1.

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

Evaluator Notes:

The Incident information in Attachment 4 was compared to the incidents reported in the PDM. The three incidents listed in both were the same. No issues.

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

Evaluator Notes:

2018 Probable Violation information was queried from the inspection database. The number found in 2018 and the number corrected in 2018 were correct. Civil penalty documentation was provided that confirmed the penalties issued and collected.

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Were pipeline program files well-organized and accessible? - Progress Report Attachment 6<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

Files were accessible from the inspection database.

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

Evaluator Notes:

No issues were found with the individuals listed in Attachment 7. The training information is downloaded from PHMSA's Training and Qualification Division's training database.

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



Evaluator Notes:

The MADPU has automatic adoption authority. Upon an issue of an Amendment to Pipeline Safety Regulations by PHMSA, the amendment is immediately adopted.

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

Evaluator Notes:

No issues requiring a loss of points with the Program Accomplishment narrative in Attachment 10. The MADPU should review for any updates in future submissions.

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

Evaluator Notes:

No issues requiring a loss of points were found during the evaluation visit.

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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

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

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Inspection Procedures are covered in the MADPU's General Inspection, Enforcement & Incident Investigation Procedures Manual. The latest revision, Version 3.2 dated 3/1/2019, was reviewed. Sections 7.0 Inspection Responsibilities and Planning Requirements; Section 8.0 Annual Inspection Work plans; Section 9.0 Conducting Pipeline Inspections and 9.21 Standard Inspections contain the procedures that meet this requirement. Section 9.0 contains the Pre-Inspection, Inspection and Post-Inspection elements.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Inspection Procedures are covered in the MADPU's General Inspection, Enforcement & Incident Investigation Procedures Manual. The latest revision, Version 3.2 dated 3/1/2019, was reviewed. Section 9.28 "Integrity Management for Intrastate Gas Transmission Inspections" and Section 9.29 "DIMP Inspections" provide procedures to inspectors for conducting Transmission Integrity Management Program (IMP) and Distribution Integrity Management Program (DIMP) inspections. DIMP procedures cover large and small operators.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Inspection Procedures are covered in the MADPU's General Inspection, Enforcement & Incident Investigation Procedures Manual. The latest revision, Version 3.2 dated 3/1/2019, was reviewed. Section 9.25 covers Operator Qualification Inspections. All requirements are met in these procedures.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Inspection Procedures are covered in the MADPU's General Inspection, Enforcement & Incident Investigation Procedures Manual. The latest revision, Version 3.2 dated 3/1/2019, was reviewed. Section 9.27 Damage Prevention Activities provides procedures for inspectors to conduct Damage Prevention Inspections. All requirements and elements are covered.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Inspection Procedures are covered in the MADPU's General Inspection, Enforcement & Incident Investigation Procedures Manual. The latest revision, Version 3.2 dated 3/1/2019, was reviewed. Procedures outlined in Section 9.26 - On-Site Operator Training meet requirements.



- 6** Construction Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. 1 1  
 Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Inspection Procedures are covered in the MADPU's General Inspection, Enforcement & Incident Investigation Procedures Manual. The latest revision, Version 3.2 dated 3/1/2019, was reviewed. Section 9.24 of the procedures manual provides procedures for inspectors to conduct construction inspections. All requirements and elements are covered in the procedures.

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

- |  |                                      |                          |   |
|--|--------------------------------------|--------------------------|---|
| a. Length of time since last inspection (Within five year interval)  | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)   | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. Type of activity being undertaken by operators (i.e. construction)  | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc)  | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f. Are inspection units broken down appropriately?   | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

Inspection Procedures are covered in the MADPU's General Inspection, Enforcement & Incident Investigation Procedures Manual. The latest revision, Version 3.2 dated 3/1/2019, was reviewed. Section 7.6 covers the elements of length of time since last inspection, operating history, operator activities and operator inspection unit locations. Section 7.5 provides the maximum inspection intervals for operator and inspection types. Appendix A describes the risk assessment model utilized by the MADPU to identify high-risk inspection units.

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

Evaluator Notes:

No issues were found requiring a loss of points during the evaluation visit.

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



# PART C - Program Performance

Points(MAX) Score

- 1** Was ratio of Total Inspection person-days to total person days acceptable? (Director of State Programs may modify with just cause) Chapter 4.3 5 5  
 Yes = 5 No = 0  
 A. Total Inspection Person Days (Attachment 2):  
 1059.63  
 B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
 220 X 5.53 = 1217.33  
 Ratio: A / B  
 1059.63 / 1217.33 = 0.87  
 If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0  
 Points = 5

**Evaluator Notes:**

The MADPU had 1059 inspection person days for CY2018. Based upon the 5.53 Person Days in Attachment 7, 470 is required for the full five points. It should be noted that 288 of the 1059 inspection person days was associated with inspectors provided by other state programs in assistance for the Merrimack Valley Reconstruction Project.

- 2** Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines Appendix C for requirements) Chapter 4.4 5 5  
 Yes = 5 No = 0 Needs Improvement = 1-4
- a. Completion of Required OQ Training before conducting inspection as lead? Yes  No  Needs Improvement
  - b. Completion of Required DIMP\*/IMP Training before conducting inspection as lead? \*Effective Evaluation CY2013 Yes  No  Needs Improvement
  - c. Root Cause Training by at least one inspector/program manager Yes  No  Needs Improvement
  - d. Note any outside training completed Yes  No  Needs Improvement
  - e. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector. Yes  No  Needs Improvement

**Evaluator Notes:**

Richard Wallace, Phillip Denton, Angela Motley, Terrence Townsend and Kevin Callahan have met the requirements to lead Standard, OQ and DIMP inspections for pipeline facilities. No individuals have completed the required training for Transmission Integrity Management; therefore the NO Box is checked.. Because there were no Transmission Integrity Management Inspections conducted during 2018, no loss of points was given in Question C.2 (b). Richard Wallace, Phillip Denton and Angela Motley have required training for LNG facilities. The remaining inspectors are on schedule to complete the core requirements for pipeline inspections. The Root Cause training requirement has been met.

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

**Evaluator Notes:**

Yes. Mr. Wallace exhibited more than adequate knowledge of PHMSA's program and gas pipeline safety regulations. He has over 35 years of experience in pipeline safety.

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

**Evaluator Notes:**

Yes, the MADPU's response was received prior to the sixty-day deadline. The findings discussed in the Chairman's letter were addressed and corrective action was described. Although corrective action was addressed in the response, the deficiency is still ongoing for following enforcement procedures as described in Question D.2.

- 5** Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5 1 1  
 Yes = 1 No = 0



Evaluator Notes:

Yes, the MADPU participated in the pipeline safety seminar in October, 2016 and in October, 2018.

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

Evaluator Notes:

A review of the MADPU's inspection database (inspection plan and tracking system) was conducted. There were no inspection units identified where inspection intervals were deficient. However, the inspection activity was impacted during 2018 due to the loss of inspection staff. The reduced activity in 2018 could affect the MADPU's ability to meet five year interval requirement for Standard, Operator Qualification and Integrity Management Inspections in the future. Accelerated training to qualify newly hired staff will be needed to mitigate this concern.

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

Evaluator Notes:

A review of randomly selected inspections completed during 2018 was conducted. The MADPU conducts what it defines as Comprehensive Standard Inspections which is equivalent to what PHMSA defines as Standard Inspections. The MADPU defines a Standard Inspection as any piece or portion of a Comprehensive Standard Inspection. The MADPU may conduct multiple MADPU defined Standard Inspections before a Comprehensive Standard Inspection is completed entirely. This approach complicates the confirmation of all applicable code requirements being covered due a Comprehensive Standard inspection not being consolidated into one report. There were no deficiencies found in the randomly selected inspections; however, the number of inspections reviewed were limited due to the difficulty in reviewing multiple Standard Inspections that make up a Comprehensive Standard Inspection. The MADPU should consider the use of PHMSA's Inspection Assistant system which would provide an easier method to confirm that all requirements are covered.

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

Evaluator Notes:

Yes. The MA-DPU utilized its Standard Comprehensive Cast Iron inspection form which addresses this requirement. Upon a review of randomly selected inspection reports, this requirement was reviewed during inspections.

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

Evaluator Notes:

Yes. Operators are required to conduct "Winter Surveys, provide regular operator updates and submit quarterly leak and status reports to the MA-DPU. Data Analyst position reviews and monitor reports, identify trends and incorporate results into new risk model.

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

Evaluator Notes:

Yes. From the database, there is Inspection Form Type: Standard Comprehensive Sub-Type: Operation and Maintenance. Upon a review of randomly selected inspection forms, this requirement was covered.

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- 11** Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 192.617? Chapter 5.1 1 1  
Yes = 1 No = 0

Evaluator Notes:

Yes. Operators are to submit Incident analysis of accidents which are reviewed. Operators are also required to submit damage reports which are also reviewed and acted on when necessary. All gas operators are required to submit various leak reports detailing their activities. Results are factored into program's risk management analysis.

- 12** Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues? 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, the MADPU reviews all the Annual Reports of all the operators under its jurisdiction. A Data Analyst in the MADPU is responsible for reviewing submitted information and providing analysis. All Incident/Accident written reports submitted by operators are reviewed for completeness and accuracy.

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

Evaluator Notes:

A letter is sent annually (December) to operators requesting a copy of their annual submission. Responses to the request are kept in the MADPU records.

- 14** 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 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Two comprehensive Drug and Alcohol Plan Inspections were conducted in 2018 but represents 50% of operator covered employees in the state of Massachusetts.

- 15** 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 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

The MADPU conducted OQ Program Inspections in 2017 and 2018. The five year cycle ends in 2021. The MADPU performs OQ Protocol 9 inspections annually.

- 16** Is state verifying operator's gas transmission integrity management programs (IMP) are up to date? This should include a previous review of IMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review should take in to account program review and updates of operators plan(s). (Are the State's largest operators programs being contacted or reviewed annually? Are replies to Operator IM notifications addressed? (formerly part of Question C-13)). 49 CFR 192 Subpart 0 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

There were no inspections conducted on the six gas transmission operators during 2018; however, the MADPU is still on schedule to meet its inspection time interval if this inspection type is given a priority in the near term. Upon a review of PHMSA's Pipeline Data Mart, there are a total of 32.8 miles of intrastate gas transmission pipelines with approximately 17 of the 32.8 miles in High Consequence Areas. The MADPU must qualify an inspector to lead this type of inspection. At the end of 2018, no inspectors had completed the training requirements. Because there were no Transmission Integrity Management Inspections conducted during 2018, a loss of points was not given in Question C.2 (b).

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

Evaluator Notes:

The MADPU is on schedule to meet it inspection time interval for DIMP inspections.

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| <b>18</b> | Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. PAPEI Effectiveness Inspections should be conducted every four years by operators. 49 CFR 192.616<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

The MADPU is on schedule to meet it inspection time interval for PAPEI inspections.

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| <b>19</b> | Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public).<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

Pipeline safety information is posted on the MA-DPU's web site. Information regarding Gas Safety, Jurisdictional Authority, Pipeline Safety regulations, Incident Reports, Enforcement Data, Dig Safe information, and "Enhancement Plans/Orders" detailing approved Cast Iron/Bare Steel Replacement plans. The Pipeline Safety Division Director also conducted meetings with pipeline operators to discuss issues and concerns.

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|-----------|---|---|---|
| <b>20</b> | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

No issues were found with the one SRC report in 2018. The MADPU has been monitoring at least every 30 days.

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|-----------|---|---|---|
| <b>21</b> | Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns?<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

The MADPU inquires during Quarterly meeting with operators and as part of meetings with the MA Gas Advisory Council. Mandatory reporting by operators is required.

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|-----------|--|---|---|
| <b>22</b> | Did the state participate in/respond to surveys or information requests from NAPS or PHMSA?<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

No instances were identified where the MADPU did not appropriately respond.

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|-----------|--|---|---|
| <b>23</b> | If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate.<br>No = 0 Needs Improvement = .5 Yes = 1 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

The MADPU has many waivers/special permits listed on PHMSA's Website. Most of these waivers are related to above ground plastic pipe installed in metal conduit suspended under bridges. This installation of plastic pipe is now allowed in the pipeline safety regulations. The MADPU should contact PHMSA's Regulations Division to request these waivers be pulled down from PHMSA's web site.



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**24** Did the state attend the NAPS National Meeting in CY being evaluated? 1 NA  
No = 0 Needs Improvement = .5 Yes = 1

Evaluator Notes:

Because of the Merrimack Valley Incident, the Program Manager was not able to attend. PHMSA State Programs Division Director waived the requirement for CY2018.

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**25** Discussion on State Program Performance Metrics found on Stakeholder Communication site - <http://primis.phmsa.dot.gov/comm/states.htm> 2 2  
No = 0 Needs Improvement = 1 Yes = 2

- a. Discussion of Potential Accelerated Actions (AA's) based on any negative trends Yes  No  Needs Improvement
- b. NTSB P-11-20 Meaningful Metrics Yes  No  Needs Improvement

Evaluator Notes:

Discussed performance metrics. The MA-DPU metrics appeared to be at reasonable performance levels. Excavation damages per 1000 tickets have trended down since 2010. Currently averaging approximately 2.20. Inspection days per 1000 miles trending up since 2014 averaging 28 days. Inspection person days/MMO/LPG is trending in a negative direction but is a reflection of inspection scheduling according to risk. When staffing replacements are on board this trend will reverse. Inspector core training percentage for CY2017 at 90%. This metric will be negatively impacted with the recent hiring of inspectors. The MADPU should place a high priority on new inspectors training at PHMSA's Training and Qualifications facility in Oklahoma City. The high number of leaks repaired and #of Hazardous leaks repaired per 1000 miles are results of the ongoing CI and Bare Steel replacement programs. The average number of outstanding leaks remains low as a result.

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**26** Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT) Has the State updated SICT data? 1 1  
No = 0 Yes = 1

Evaluator Notes:

- No issues requiring a loss of points. However, the following recommendations are made:
1. The large LDC's and other operators should be broken down by individual operator for risk considerations.
  2. Although it appears construction days are adequately done in Massachusetts, there should be more recognition of this in the operator breakdown of days.
  3. LNG needs to be broken down more.
  4. Verify propane operator count.
  5. Verify total days devoted to Master Meter systems are correct.
  6. Total days appears acceptable, but work needs to be done on how days are broken down and allocated.
- 

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

Evaluator Notes:

There were no relevant reversals during 2018.

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**28** General Comments: Info Only Info Only  
Info Only = No Points

Evaluator Notes:

No issues were found requiring a loss of points during the evaluation visit.

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Total points scored for this section: 47  
Total possible points for this section: 47

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

Evaluator Notes:

Yes. Section 10.0 of the Division's General Inspection Procedure manual provides process and procedures for enforcement of non-compliance. It should be noted that the procedures place a significant work load on the Program Manager to issue Notice of Probable Violations to operators. A considerable amount of time is spent on Information Requests to the operator following the Inspection Exit Letter. This step can slow down the process which was found to be the case in several compliance instances discovered during the evaluation. See Question C.2.

- |   |  |                                      |   |
|---|--|--------------------------------------|---|
| 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? (Incident Investigations do not need to meet 30/90 day requirement) Chapter 5.1<br>Yes = 4 No = 0 Needs Improvement = 1-3 | 4                                    | 1   |
|   | a. Were compliance actions sent to company officer or manager/board member if municipal/government system?   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/>            |
|   | b. Document probable violations  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/>            |
|   | c. Resolve probable violations   | Yes <input type="radio"/>            | No <input type="radio"/> Needs Improvement <input checked="" type="radio"/> |
|   | d. Routinely review progress of probable violations  | Yes <input type="radio"/>            | No <input type="radio"/> Needs Improvement <input checked="" type="radio"/> |
|   | e. Within 30 days, conduct a post-inspection briefing with the owner or operator of the gas or hazardous liquid pipeline facility inspected outlining any concerns; and  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/>            |
|   | f. Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection.   | Yes <input type="radio"/>            | No <input type="radio"/> Needs Improvement <input checked="" type="radio"/> |

Evaluator Notes:

1. A review of randomly selected inspection reports was conducted. Notices of Probable Violations were sent to officers of private companies. The documentation of probable violations could not be found on some inspection forms because the forms could not be provided. An administrative person keeps a record of the inspection reports with probable violations and enters updates on each step of the process into a spreadsheet until the enforcement process is closed. The operator is provided an exit letter containing preliminary findings within 90 days after the inspection is completed. It is recommended that the MADPU place a priority on the enforcement processing of some past inspection findings. Several reports completed and exit letters provided during 2014 to 2017 have not reached the NOPV issuance step. A listing of Enforcement Dockets with Exit Letter dates prior to 2018 is provided below:

Docket	Exit Letter	Info Request	Response	NOPV
18-PL-04	9/7/17	Not Issued	None	Not Issued
18-PL-05	6/22/16	8/10/16	8/24/16	Not Issued
18-PL-06	12/28/17	Not Issued	None	Not Issued
18-PL-08	7/19/16	11/22/16	12/7/16	Not Issued
18-PL-09	8/4/16	Not Issued	None	Not Issued
18-PL-10	9/23/16	Not Issued	None	Not Issued
18-PL-11	6/30/17	Not Issued	None	Not Issued
18-PL-14	7/22/15	Not Issued	None	Not Issued
18-PL-18	7/30/15	1/7/15	2/20/15	Not Issued
18-PL-20	6/1/16	Not Issued	None	Not Issued
18-PL-21	4/8/16	Not Issued	None	Not Issued
18-PL-22	6/30/16	Not Issued	None	Not Issued
18-PL-27	12/19/17	Not Issued	None	Not Issued
18-PL-30	12/18/17	Not Issued	None	Not Issued
18-PL-31	7/22/14	Not Issued	None	Not Issued

2. In a response to an information request following the site visit, the MADPU provided information that showed 10 inspections conducted in CY2018 did not have notifications within 90 days stating preliminary findings. One point was deducted for this deficiency.

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

Evaluator Notes:

A review of randomly selected inspection reports was conducted. The MADPU has issued exit letters for all Probable Violations; however, not all have been processed through the final steps. As noted in C.2, there are several reports from 2014 to 2017 that have not reached the NOPV step.

**4** Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary. 2 2  
 Yes = 2 No = 0

Evaluator Notes:

Typically, the compliance actions are handled through an informal conference process with the Director to resolve the compliance actions. If this process fails, the operator has the option for a formal hearing before the Commission and ultimately can appeal any Commission order to the Supreme Judiciary Court of Massachusetts

**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) 2 2  
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. The Program Manager is familiar with the civil penalty process and has the authority to issue penalties without commission approval. Civil penalties are considered for repeat violations and several civil penalties have been assessed in prior years. Civil penalties in the amount of \$175,000.00 assessed in CY2018.

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

Evaluator Notes:

Yes. Civil penalty information in past Progress Reports demonstrate the MADPU does exercise its civil penalty authority. Civil penalties in the amount of \$175,000.00 assessed in CY2018

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

Evaluator Notes:

Question C.2 - Needs Improvement. Loss of Three Points

1. A review of randomly selected inspection reports was conducted. Notices of Probable Violations were sent to officers of private companies. The documentation of probable violations could not be found on some inspection forms because the forms could not be provided. An administrative person keeps a record of the inspection reports with probable violations and enters updates on each step of the process into a spreadsheet until the enforcement process is closed. The operator is provided an exit letter containing preliminary findings within 90 days after the inspection is completed. It is recommended that the MADPU place a priority on the enforcement processing of some past inspection findings. Several reports completed and exit letters provided during 2014 to 2017 have not reached the NOPV issuance step. A listing of Enforcement Dockets with Exit Letter dates prior to 2018 is provided below:

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18-PL-08	7/19/16	11/22/16	12/7/16	Not Issued
18-PL-09	8/4/16	Not Issued	None	Not Issued
18-PL-10	9/23/16	Not Issued	None	Not Issued

18-PL-11	6/30/17	Not Issued	None	Not Issued
18-PL-14	7/22/15	Not Issued	None	Not Issued
18-PL-18	7/30/15	1/7/15	2/20/15	Not Issued
18-PL-20	6/1/16	Not Issued	None	Not Issued
18-PL-21	4/8/16	Not Issued	None	Not Issued
18-PL-22	6/30/16	Not Issued	None	Not Issued
18-PL-27	12/19/17	Not Issued	None	Not Issued
18-PL-30	12/18/17	Not Issued	None	Not Issued
18-PL-31	7/22/14	Not Issued	None	Not Issued

2. In a response to an information request following the site visit, the MADPU provided information that showed 10 inspections conducted in CY2018 did not have notifications within 90 days stating preliminary findings. One point was deducted for this deficiency.

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Total points scored for this section: 11  
Total possible points for this section: 15



# PART E - Incident Investigations

Points(MAX) Score

- 1 Does the state have written procedures to address state actions in the event of an incident/accident? 2 2  
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. Section 12.0 (Investigation of Incidents) of the MADPU's General Inspection, Enforcement & Incident Investigation Procedures Manual provides the procedures along with Appendix "L" (Incident Investigation Form).

- 2 Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? And did state keep adequate records of Incident/Accident notifications received? Chapter 6 2 2  
 Yes = 2 No = 0 Needs Improvement = 1

- a. Acknowledgement of MOU between NTSB and PHMSA (Appendix D) Yes  No  Needs Improvement   
 b. Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E) Yes  No  Needs Improvement

Evaluator Notes:

Appendices "J" (Telephonic Incident) Notification, "K" (Memorandum of Understanding Between DOT and NTSB) of the MADPU's General Inspection, Enforcement & Incident Investigation Procedures Manual provide the information.

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

Evaluator Notes:

All incidents that were not excavation damages were investigated onsite.

- 4 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? 3 3  
 Yes = 3 No = 0 Needs Improvement = 1-2

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

Evaluator Notes:

There were three reportable incidents in 2018. Two incidents, Merrimack Valley Incident and Park Street, are still in the investigation process. The investigation file of the remaining incident was reviewed. No issues were identified.

- 5 Did the state initiate compliance action for violations found during any incident/accident investigation? 1 NA  
 Yes = 1 No = 0

Evaluator Notes:

Merrimack Valley and Park Street Incidents are still in the investigation process. The investigations of the remaining incident concluded there were no probable violations. The remaining incident that occurred in 2018 did not require compliance action.

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

Evaluator Notes:

There were no instances discovered where the MADPU did not assist PHMSA with follow-up actions.



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

Evaluator Notes:

Yes, as part of the NAPSР Eastern Region - State of the State presentation.

---

8 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues were found that required a loss of points during the evaluation visit.

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



**PART F - Damage Prevention**

**Points(MAX) Score**

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

Evaluator Notes:

Yes, the MADPU verifies that an operator has directional drilling/boring procedures as part of an overall review of the operator's written Operation and Maintenance Procedures.

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | Did the state inspector verify pipeline operators are following their written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system?<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

Yes, the MADPU reviews operators' compliance with Part 192.614 during Standard Comprehensive Inspections. Also, Dig Safe violation reports submitted to the agency are reviewed to identify probable violations and possible enforcement action as needed.

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

Evaluator Notes:

Yes. The MADPU provides Dig Safe training provided annually for excavators. Information is also posted and updated on the MA-DPU web site. The MADPU sponsors an event where a damage prevention information kiosk is set up in the South Station Concourse. South Station is a major transportation hub in Boston with approximately 50,000 travelers a day.

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

Evaluator Notes:

Yes. The MADPU requires operators to submit Dig Safe Activity Reports on a quarterly basis. Pipeline damage averaged 2.5 damages per 1000 miles of pipe during CY2017 and 2.2 during CY2018.

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

Evaluator Notes:

No issues were found that required a loss of points during the evaluation visit.

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:  
 1. Liberty Utilities 2. Eversource Energy  
 Name of State Inspector(s) Observed:  
 Angela Motley  
 Location of Inspection:  
 1. Fall River, MA 2. New Bedford, MA  
 Date of Inspection:  
 1. April 16-17, 2019 2. April 18, 2019  
 Name of PHMSA Representative:  
 Don Martin

Evaluator Notes:

1. The MA DPU conducted an inspection of the operator's DIMP Plan. The inspector utilized Form 22 from its inspection database. The form is consistent with PHMSA's IA Form 22.
2. The MADPU conducted a Construction Inspection on a project to replace a low pressure with a high pressure system. On this day, a service line replacement was being tied-in to a newly constructed PE main.

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

Evaluator Notes:

1. The operator representatives were present during the inspection. The operator was represented by John Amorim, Engineering Supervisor; John Pacheco, System Protection Supervisor; and Nick Saccone, Engineering Manager. Proper notification was given the MA DPU.
2. The operator was represented by Gene Ridge, Construction Supervisor. The MADPU does not provide prior notification on Construction Inspections.

**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) 2 2  
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

1. The inspector utilized Form 22 from its inspection database. This form is consistent with PHMSA's Inspection Assistant (IA) Equivalent Form 22.
2. The MADPU utilized its Construction Inspection Form.

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

Evaluator Notes:

Both inspections were documented appropriately.

**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.) 1 1  
 Yes = 1 No = 0

Evaluator Notes:

1. Not applicable for a DIMP inspection.
2. Yes, all equipment used for the tie-in was inspected and verified for calibration if applicable.

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

a. Procedures



- b. Records
- c. Field Activities
- d. Other (please comment)

Evaluator Notes:

1. Yes, very thoroughly.
2. Yes. all procedures related to service line installations, joining of plastic and use of mechanical fittings, general construction and gas service restoration.

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

Evaluator Notes:

1. The lead inspector, Angela Motley, is a Category 1 inspector based upon being a degreed engineer, completion of training at PHMSA's Training and Qualification Division (TQ) and experience. Specifically, for this inspection, the lead inspector successfully completed the Distribution Integrity Management Program training course at TQ. The lead inspector exhibited excellent knowledge of pipeline safety regulations.
2. Yes, Mr. Townsend exhibited excellent knowledge of the regulations and was well versed in the operator's construction procedures.

**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) 1 1  
 Yes = 1 No = 0

Evaluator Notes:

1. Yes and notified the operator that the inspection would continue since it was not completed in this visit.
2. Yes, a very detailed interview was provided.

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

Evaluator Notes:

1. Concerns were noted but at this no probable violations have been determined. Final interview would be conducted during the next visit to be conducted soon.
2. Yes, the inspector covered items of concern but determination of any probable violations would follow in written correspondence from MADPU.

**10** General Comments: 1) What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) 2) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) 3) Other. Info Only Info Only

Info Only = No Points

- a. Abandonment
- b. Abnormal Operations
- c. Break-Out Tanks
- d. Compressor or Pump Stations
- e. Change in Class Location
- f. Casings
- g. Cathodic Protection
- h. Cast-iron Replacement
- i. Damage Prevention
- j. Deactivation
- k. Emergency Procedures
- l. Inspection of Right-of-Way
- m. Line Markers
- n. Liaison with Public Officials
- o. Leak Surveys



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

Evaluator Notes:

No issues were found that resulted in a loss of points in the evaluation. The two inspections were very thorough and conducted in a professional manner.

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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)? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:  
The MADPU is not an interstate agent.

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

Evaluator Notes:  
The MADPU is not an interstate agent.

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

Evaluator Notes:  
The MADPU is not an interstate agent.

**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.) 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:  
The MADPU is not an interstate agent.

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

Evaluator Notes:  
The MADPU is not an interstate agent.

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

Evaluator Notes:  
The MADPU is not an interstate agent.

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

Evaluator Notes:  
The MADPU is not an interstate agent.

**8** General Comments: Info OnlyInfo Only  
Info Only = No Points

Evaluator Notes:  
The MADPU is not an interstate agent.

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



**PART I - 60106 Agreement State (If Applicable)**

**Points(MAX) Score**

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

Evaluator Notes:  
The MADPU does not have a 60106 Agreement with PHMSA.

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

Evaluator Notes:  
The MADPU does not have a 60106 Agreement with PHMSA.

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

Evaluator Notes:  
The MADPU does not have a 60106 Agreement with PHMSA.

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

Evaluator Notes:  
The MADPU does not have a 60106 Agreement with PHMSA.

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

Evaluator Notes:  
The MADPU does not have a 60106 Agreement with PHMSA.

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

Evaluator Notes:  
The MADPU does not have a 60106 Agreement with PHMSA.

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

Evaluator Notes:  
The MADPU does not have a 60106 Agreement with PHMSA.

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

