



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

MAINE PUBLIC UTILITIES COMMISSION

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: Maine

Agency Status:

Date of Visit: 07/23/2019 - 07/25/2019

Agency Representative: August 9, 2019

Gary Kenny

Gas Safety Manager

PHMSA Representative: Clint Stephens

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

Name/Title: Mr. Philip L. Bartlett II, Chairman

Agency: Maine Public Utilities Commission

Address: State House Station 18

City/State/Zip: Augusta, Maine 04333-0018

Rating:

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

INSTRUCTIONS:

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 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
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)

10	10
13	13
49	49
15	15
6	6
8	8
11	11
0	0
0	0

TOTALS

112 112

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
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

There seems to be no issue with accuracy in Attachment 1 of Progress Report.

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|---|--|---|---|
| 2 | Review of Inspection Days for accuracy - Progress Report Attachment 2
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

There seems to be no issue with accuracy in Attachment 2 of Progress Report.

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| 3 | Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

There seems to be no issue with accuracy in Attachment 3 of Progress Report.

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|---|--|---|---|
| 4 | Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

There were no reportable incidents in CY2018.

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| 5 | Accuracy verification of Compliance Activities - Progress Report Attachment 5
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

There seems to be no issue with accuracy in Attachment 5 of Progress Report.

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

Evaluator Notes:

Majority of program files are stored in G: and H: Drive which is well organized and accessible.

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| 7 | Was employee listing and completed training accurate and complete? - Progress Report Attachment 7
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

There seems to be no issue with accuracy in Attachment 7 of Progress Report. Information was verified through the T&Q blackboard.

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

The ME PUC has adopted all rules and amendments. There seems to be no issue with accuracy in Attachment 8 of Progress Report.

- 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:

There seems to be no issue with accuracy in Attachment 10 of Progress Report. Accelerated main replacement program ?
3.59 miles of cast iron main, 1.2 miles of bare/unprotected steel main, and .4 miles of plastic pipe were replaced in 2018. ME
PUC utilizes IA for inspections, along with the Spotter software.

10 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

There were no issues in Part A of evaluation.

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



PART B - Program Inspection Procedures

Points(MAX) Score

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

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Appendix C, ?C of the MPUC Gas Safety Program Procedures includes the general Pre-Inspection, Inspection, and Post Inspection Activities which are incorporated for all inspection types.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Appendix C, ?C of the MPUC Gas Safety Program Procedures includes the general Pre-Inspection, Inspection, and Post Inspection Activities which are incorporated for all inspection types.

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| 3 | OQ Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Appendix C, ?C of the MPUC Gas Safety Program Procedures includes the general Pre-Inspection, Inspection, and Post Inspection Activities which are incorporated for all inspection types.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Appendix C, ?C of the MPUC Gas Safety Program Procedures includes the general Pre-Inspection, Inspection, and Post Inspection Activities which are incorporated for all inspection types. Damage Prevention inspections are primarily conducted by the MPUC Damage Prevention Staff, per the Chapter 895 Rule, and the Gas Safety Staff becomes involved if the circumstances warrant.

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| 5 | Any operator training conducted should be outlined and appropriately documented as needed. | 1 | 1 |
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

MPUC Gas Safety Staff participates in the New England Pipeline Safety Seminars with the other five New England states. These seminars are conducted annually in conjunction with TQ and are referenced in Section 9 of the MPUC Gas Safety Program Procedures, as well as

included on the annual inspection plan (see Attachment 1 to Appendix C of the Procedures). The MAINE PUC hosted the 2016 seminar on October 19 and 20. These seminars and any other training that is conducted is logged on the Inspection Tracker spreadsheet. There was no seminar in 2017; Rhode Island did not keep its commitment to host it. The 2018 seminar was held in New Hampshire.

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| 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.
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:
Appendix C, ?C of the MPUC Gas Safety Program Procedures includes the general Pre-Inspection, Inspection, and Post Inspection Activities which are incorporated for all inspection types.

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|----|---|--------------------------------------|--|
| 7 | Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements?
Yes = 6 No = 0 Needs Improvement = 1-5 | 6 | 6 |
| 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:
The process for developing the inspection plan is located in Appendix C of the MPUC Gas Safety Program Procedures. Section A of Appendix C provides the background and foundation of the inspection program. Section B of the Appendix discusses both planned and risk-based inspections, including the elements considered when planning inspections annually. Appendix A of the Procedures includes a breakdown of inspection units.

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| 8 | General Comments:
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:
There were no issues in Part B of evaluation.

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):
242.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 2.50 = 550.00

Ratio: A / B
242.00 / 550.00 = 0.44

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

Evaluator Notes:

Ratio = A/B = 242/550 = 0.44 $>$ 0.38. No issues.

- 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

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|----|--|--------------------------------------|--------------------------|---|
| 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"/> |
| e. | Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector. | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

All inspectors and program manager have fulfilled the T & Q Training requirements. Sean Watson has not completed IM course, Root Cause analysis, and PAPEE seminar.

- 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. Discussion with state pipeline safety program manager indicated adequate knowledge of PHMSA program and regulations.

- 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:

There was no response required from the Chairman's letter which had no noted deficiencies.

- 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:

MPUC Gas Safety Staff participates in the New England Pipeline Safety Seminars with the other five New England states. These seminars are conducted annually in conjunction with TQ and are referenced in Section 9 of the MPUC Gas Safety Program Procedures, as well as included on the annual inspection plan (see Attachment 1 to Appendix C of the Procedures). The MPUC hosted the 2016 seminar on October 19 and 20. The MPUC participated in the 2018 seminar hosted by New Hampshire.

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

Reviewed inspection reports for Bangor Natural Gas (Standard O&M, IM) and Summit Natural Gas of Maine (OQ, O&M). The MPUC inspected all types of operators and inspection units in accordance with time intervals established in written procedures.

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| 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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

The MPUC Gas Safety staff uses PHMSA forms for all inspection types for which forms are available. All portions of the forms applicable to the type of inspection being conducted are completed. Beginning in 2016, with few exceptions (such as D&A, Construction, & LPG), PHMSA's IA was and is continuing to be utilized to build applicable inspection forms.

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

Evaluator Notes:

Only one operator in Maine ? Unutil (Northern Utilities) ? has cast iron pipe in their system. Section 2.4 of their O&M Procedures (dated 3/1/18, Version 8) states the following:

(c) Cast Iron Piping

Check cast iron pipe for graphitization corrosion. Look for soft black spots underneath the scale and tightly bonded soil or corrosion product. This type of corrosion is attributed to the iron being selectively dissolved, leaving a porous mass consisting largely of graphite. The material remaining may appear intact but is relatively soft, and may be scraped or indented easily with a sharp instrument.

Each segment of cast iron or ductile iron pipe on which general graphitization is found to a degree where a fracture or leakage might result must be replaced.

Each segment of cast iron or ductile pipe on which localized graphitization is found to a degree where leakage might result, must be replaced, repaired, or sealed by internal sealing methods adequate to prevent or arrest any leakage.

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| 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
Yes = 1 No = 0 | 1 | 1 |
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Evaluator Notes:

Unutil (Northern Utilities) has a cast iron and bare steel model used for the ranking of pipe and the priority of its replacement.

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| 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
Yes = 1 No = 0 | 1 | 1 |
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Evaluator Notes:

This question is included as part the MPUC standard inspections in IA equivalent form.

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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
Yes = 1 No = 0 | 1 | 1 |
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Evaluator Notes:

MPUC Rule Chapter 420 ? E.3 requires that operators provide monthly reports to the MPUC of the response times to emergency calls. Any responses exceeding 60 minutes, without an adequate explanation, are investigated. The MPUC Damage Prevention Investigators (DPIs) investigate all damage prevention incidents whether or not there are any facility damages. The DPIs discuss natural gas and LPG related incidents with the Program Manager and/or Inspector(s). When warranted, incidents are also investigated to see if pipeline safety violations were involved. There were no incidents or accidents in 2018 which required reporting under Part 191.

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

The annual reports are reviewed for trends regarding cast iron and unprotected steel pipe (only one operator has them), mains and services, leaks, damages, and unaccounted for gas. Please see attached annual report summary and unaccounted for gas history. There were no incidents or accidents in 2018 which required reporting under part 191.

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

The MPUC verified NPMS data through Public Viewer for Bangor Gas, Maine Natural Gas, Summit Natural Gas, and Woodland Pulp.

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| 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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

The MPUC has only used the Form 13 for D&A inspections. D&A inspections were conducted, in 2018, for the contractors of the LDCs using Form 13.

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| 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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

The MPUC performed OQ Program inspections for Summit Natural Gas and Maine Natural Gas in 2018. ME PUC Rule Chapter 420 ? 7.D.1.d requires that natural gas operators submit their OQ plans to the MPUC annually. The qualification of the operator's and contractor's personnel is verified each time tasks are observed during inspections. If the records are not available at the time of the inspection, they are either requested from the operator or obtained from the appropriate database.

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| 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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

The MPUC inspected Bangor Gas' IMP plan in 2014 and is scheduled for 2018/2019. The IMP plans of Summit Natural Gas

and Woodland Pulp were inspected in 2015. Maine Natural Gas' transmission pipeline has no HCAs. The IMP records of Summit were reviewed in 2016 and their verification digs were reviewed in 2017.

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| 17 | 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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

The DIMP plans of all LP operators were reviewed in 2014. Summit Natural Gas' distribution system went in service in 2014 and their DIMP plan was inspected in 2015. The DIMP plans of the other utilities have been inspected as follows:

? Bangor Gas ? 2014 and 2016

? Maine Natural Gas ? 2013, 2016, and 2017.

? Unitil ? 2012 and 2016.

Unitil is the largest operator. Numerous inspections are conducted each year pertaining to their cast iron replacement.

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| 18 | 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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

The following are the years of the most recent Public Awareness inspections:

? Bangor Gas: 2013 & 2016

? Maine Natural Gas: 2013 and 2018

? Summit Natural Gas: 2015 and 2017

? Unitil: 2012 & 2016

? Woodland Pulp: 2015 with 2016 review of 2015 stakeholder surveys

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| 19 | 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).
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

The following methods of communication are utilized:

? Dissemination of Federal Register notices and other pertinent information to operators via e-mail. The Program Manager maintains operator distribution lists (LPG and Natural Gas) for dissemination of these notices.

? Information concerning gas safety regulations and contact information is available on the Commission website.

Enforcement cases are available to the public through the Commission's Case Management System.

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| 20 | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

The following methods of communication are utilized:

? Dissemination of Federal Register notices and other pertinent information to operators via e-mail. The Program Manager maintains operator distribution lists (LPG and Natural Gas) for dissemination of these notices.

? Information concerning gas safety regulations and contact information is available on the Commission website.

Enforcement cases are available to the public through the Commission's Case Management System.

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| 21 | Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns? | 1 | 1 |
|-----------|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The ME PUC had no open SRCRs in 2018.

- 22 Did the state participate in/respond to surveys or information requests from NAPSR or PHMSA? 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The MPUC participates to surveys or information request through e-mail with NAPSR and PHMSA. All such correspondence is archived in the Program Managers e-mail folders for NAPSR and PHMSA.

- 23 If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate. 1 1

No = 0 Needs Improvement = .5 Yes = 1

Evaluator Notes:

A waiver to the MPUC Chapter 420 Rule regarding regulator vents (?5(B)(4)(b)(2) was issued to Unitil via Docket 2014-00135. The waiver exempts the operator from compliance with the Rule section in cases where a building opening is situated at least 8' vertically from an installed regulator vent. Regular field inspections verify compliance with this waiver requirement.

A waiver of Chapter 420 of the Commission's Rules and 49 C.F.R. ?? 192.619(a)(1) and 192.621(e)(1) with regard to MAOP of portions of Unitil's natural gas distribution system in 2014 via Docket 2011-00360. Its conditions are monitored through correspondence with the Operator, reporting by the Operator, and periodic inspections.

- 24 Did the state attend the NAPSR National Meeting in CY being evaluated? 1 1

No = 0 Needs Improvement = .5 Yes = 1

Evaluator Notes:

The Program Manager attended the 2018 NAPSR Eastern Region meeting in Pennsylvania and the 2018 National meeting in New Mexico (The Program Manager is currently NAPSR's Chair).

- 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 State Program Performance Metrics with program manager:

- ? Damage Prevention Program ? Excavation damages per 1,000 tickets had a slight increase from 2017 to 2018.
- ? Inspection Activity ? Inspection days per 1,000 miles gas pipelines decreased from 2017 to 2018 (distribution, gathering, and transmission). Inspection days increased from 2017 to 2018 for master meters and LPG operators.
- ? Inspector Qualification ? stayed consistent from 2017 to 2018.
- ? Leak Management ? Total leaks eliminated/repaired increased from 2017 to 2018; hazardous leaks eliminated/ repaired stayed the same from 2016 to 2018. No leaks scheduled for repair at the end of year both 2017 and 2018.
- ? Enforcement and Incident Investigation performance metrics have remained outstanding from 2014 to 2017.

- 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:

The SICT calculation for CY2018 is 216, and Attachment 2 indicates ME PUC inspection days for CY2018 was 242. No issue.

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

Evaluator Notes:

Pipeline Flow Reversals have not occurred. In 2013, Bangor Gas began rehabilitating a portion of a former US Air Force jet fuel pipeline, abandoned for several years, for use as a natural gas pipeline. The MPUC has conducted numerous inspections on this segment of pipeline.

- 28 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

There were no issues in Part C of evaluation.

Total points scored for this section: 49
Total possible points for this section: 49



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
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:

Appendix D of the MPUC Gas Safety Program Procedures addresses compliance action procedures, including notification of company officers and compliance tracking and follow-up.

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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? (Incident Investigations do not need to meet 30/90 day requirement) Chapter 5.1
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. | Document probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Resolve probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. | Routinely review progress of probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e. | Within 30 days, conduct a post-inspection briefing with the owner or operator of the gas or hazardous liquid pipeline facility inspected outlining any concerns; and | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f. | Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

The MPUC has followed compliance procedures from discovery to resolution and has adequately documented all probable violations. The MPUC needs to continue to monitor open probable violations until closure, and routinely review progress of the probable violations. Compliance actions are tracked by MPUC Gas Safety Program Staff on a spreadsheet.

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

Evaluator Notes:

Reviewed O&M inspections for Bangor Natural Gas and Summit Natural gas for which the state issued compliance actions for all probable violations discovered.

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

Evaluator Notes:

Yes. The MPUC gave reasonable due process to all parties for compliance actions, with no show cause hearings being necessary in CY2018.

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

Evaluator Notes:

Yes. The program manager is familiar with the state process for imposing civil penalties.

The following are MPUC Dockets for which there were NOPVs issued in 2018; including the NOPV previously referenced. The associated penalty amounts assessed are also listed:
? 2018-00011 - \$ 15,000

? 2018-00012 - \$ 15,000
? 2018-00077 - \$ 5,000
? 2018-00077 - \$ 25,000
Total: \$ 60,000

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. There was a total of \$60,000 assessed to operators in CY2018.

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

Evaluator Notes:

There were no issues in Part D of evaluation.

Total points scored for this section: 15
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:

MPUC Gas Safety Program Procedures include Accident Investigation Procedures detailed in Appendix E.

- 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:

Operators are required to notify Commission Staff in some cases, including incident reporting, per MPUC Chapter 130 requirements. No incidents were reported to MPUC in 2018 that warranted investigation.

- 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 notifications received in accordance with MPUC Chapter 130, which may not meet the reporting requirements of Part 191 are evaluated for the need to go on-site. There were no incidents that required onsite investigation in 2018.

- 4 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? 3 NA
Yes = 3 No = 0 Needs Improvement = 1-2
a. Observations and document review Yes ☒ No ☐ Needs Improvement ☐
b. Contributing Factors Yes ☒ No ☐ Needs Improvement ☐
c. Recommendations to prevent recurrences when appropriate Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

There were no reportable incidents in 2018.

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

Evaluator Notes:

There were no reportable incidents in 2018.

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

Evaluator Notes:

There were no incidents in 2018, reportable in accordance with Part 191, that required investigation and no assistance was requested from PHMSA.

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

Evaluator Notes:

There were no incidents or accidents, reportable in accordance with Part 191, in 2018 or recent years. However, lessons learned on other matters are presented regularly at NAPSRS meetings and state seminars.

? The Program Manager has discussed the history of recent HDD cross bore and pipe joining issues, in Maine, at the 2015, 2016, and 2017 NAPSRS Eastern Region meetings.

? The MPUC Gas Safety staff is actively participating in a working group, consisting of several Eastern Region states, dealing with Operator Qualification issues.

? Lesson learned information is also passed along to both natural gas and LPG Operators by group e-mails.

8 General Comments:

Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

There were no issues in Part E of evaluation.

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



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

Evaluator Notes:

This is a requirement of MPUC Rule Chapter 420 and its incorporation in Operators' O&M Procedures is verified during inspections. Likewise, Ch. 420 includes the requirement to have procedures to prevent cross bores. The latter requirement resulted in a 2014 NOPV to Summit Natural Gas with a recommended penalty of \$150,000. It was settled at \$100,000. A similar NOPV was issued to Summit, in 2016, with a recommended penalty of \$250,000. The full amount was collected. A third NOPV, for a pneumatic punch damage to a sewer lateral, was issued to Summit on December 21, 2017 with a recommended penalty of \$150,000. This is still in the adjudicatory process. A Summit damage to a residential electrical service, by HDD, is still being investigated.

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

Evaluator Notes:

The Dig Safe ticket number (indicating notification) is verified during construction inspections for work by the operator and their contractors. Random, unannounced construction site visits, by the Damage Prevention Investigators, verify marking and positive response.

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

Evaluator Notes:

The CGA Best Practices are promoted through training by the MPUC's Damage Prevention Investigators and the annual training by Maine's Managing Underground Safety Training (MUST) Committee, in which the MPUC actively participates. The CGA Best Practices are also referenced in 23.B.a. of MPUC Rule Chapter 420, SAFETY STANDARDS FOR NATURAL GAS AND LIQUEFIED NATURAL GAS FACILITY OPERATORS, regarding the qualification of pipeline locating personnel.

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

Evaluator Notes:

The Damage Prevention Investigators maintain a spreadsheet of all underground facility incidents; including those resulting in no damage. For gas pipelines, the damages per 1,000 tickets are tracked from the annual distribution reports to PHMSA. The damages per 1,000 tickets have respectively been 2.04, 1.77, 1.67, 1.54, 1.86, 2.61, 2.22, and 2.397 for 2011 through 2018. A small shift in number for damages results in a noticeable change in the damages per 1,000 tickets. This is being monitored and the situation is expected to improve as cast iron and bare steel are replaced.

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

Evaluator Notes:

There are no issues in Part F of evaluation.

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 OnlyInfo Only |
| | Info Only = No Points | |

Name of Operator Inspected:

Northern Utilities

Name of State Inspector(s) Observed:

Nathan Dore (Lead), Sean Watson, and Gary Kenny

Location of Inspection:

Portland, ME

Date of Inspection:

July 24, 2019

Name of PHMSA Representative:

Clint Stephens

Evaluator Notes:

Observed the MPUC inspectors perform a construction inspection on Northern Utilities. The operator is replacing cast iron main and service lines.

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

Yes. The operator was notified and was present during the construction inspection.

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

Yes. The inspector used an inspection checklist that was accessed through his IPAD which was used as a guide to input construction specs and regulatory requirements during the inspection.

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

Evaluator Notes:

Yes. The inspector thoroughly documented results of the inspection by inputting all data in his IPAD.

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

Yes. The inspector checked operator pipeline maps, plastic fusion equipment, and pipeline locating equipment.

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

Yes. The inspector adequately reviewed construction specification procedures, OQ records, and plastic fusion manufacturing procedures. Also, the inspector observed plastic pipe insertions, pipe fitting installations, and pressure testing.

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

Evaluator Notes:

Yes. The inspector had adequate knowledge of the pipeline safety program and regulations.

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

Evaluator Notes:

The inspector informed the operator of all concerns during the construction inspection.

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

Evaluator Notes:

There were no probable violations found during the inspection.

- | | | | |
|----|---|-----------|-----------|
| 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 = No Points | Info Only | Info Only |
|----|---|-----------|-----------|

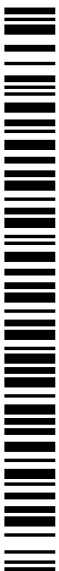
- | | | |
|----|-----------------------------------|-------------------------------------|
| a. | Abandonment | <input type="checkbox"/> |
| b. | Abnormal Operations | <input checked="" type="checkbox"/> |
| c. | Break-Out Tanks | <input type="checkbox"/> |
| d. | Compressor or Pump Stations | <input type="checkbox"/> |
| e. | Change in Class Location | <input type="checkbox"/> |
| f. | Casings | <input type="checkbox"/> |
| g. | Cathodic Protection | <input type="checkbox"/> |
| h. | Cast-iron Replacement | <input checked="" type="checkbox"/> |
| i. | Damage Prevention | <input type="checkbox"/> |
| j. | Deactivation | <input type="checkbox"/> |
| k. | Emergency Procedures | <input type="checkbox"/> |
| l. | Inspection of Right-of-Way | <input type="checkbox"/> |
| m. | Line Markers | <input type="checkbox"/> |
| n. | Liaison with Public Officials | <input type="checkbox"/> |
| o. | Leak Surveys | <input type="checkbox"/> |
| p. | MOP | <input type="checkbox"/> |
| q. | MAOP | <input type="checkbox"/> |
| r. | Moving Pipe | <input type="checkbox"/> |
| s. | New Construction | <input type="checkbox"/> |
| t. | Navigable Waterway Crossings | <input type="checkbox"/> |
| u. | Odorization | <input type="checkbox"/> |
| v. | Overpressure Safety Devices | <input type="checkbox"/> |
| w. | Plastic Pipe Installation | <input checked="" type="checkbox"/> |
| x. | Public Education | <input type="checkbox"/> |
| y. | Purging | <input type="checkbox"/> |
| z. | Prevention of Accidental Ignition | <input type="checkbox"/> |
| A. | Repairs | <input type="checkbox"/> |
| B. | Signs | <input type="checkbox"/> |
| C. | Tapping | <input type="checkbox"/> |
| D. | Valve Maintenance | <input type="checkbox"/> |

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

Evaluator Notes:

The MPUC inspectors did a good job inspecting the replacement of cast iron pipe by Northern Utilities. All concerns were discussed with the operator at the time of the inspection.

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



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

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

Evaluator Notes:

The MPUC is not an interstate agent.

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

Evaluator Notes:

The MPUC 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?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The MPUC 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.)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

The MPUC 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?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

The MPUC is not an interstate agent.

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

Evaluator Notes:

The MPUC is not an interstate agent.

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

Evaluator Notes:

The MPUC is not an interstate agent.

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

Evaluator Notes:

The MPUC 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)?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The MPUC does not have a 60106 agreement.

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

Evaluator Notes:

The MPUC does not have a 60106 agreement.

- | | | | |
|----------|---|---|----|
| 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.)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

The MPUC does not have a 60106 agreement.

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

Evaluator Notes:

The MPUC does not have a 60106 agreement.

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

Evaluator Notes:

The MPUC does not have a 60106 agreement.

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

Evaluator Notes:

The MPUC does not have a 60106 agreement.

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

Evaluator Notes:

The MPUC does not have a 60106 agreement.

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