



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

FLORIDA PUBLIC SERVICE COMMISSION, Bureau of Safety

### 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:** Florida

**Agency Status:**

**Date of Visit:** 06/04/2019 - 06/06/2019

**Agency Representative:** June 7, 2019

Mr. Rick Moses

Safety Bureau Chief

**Rating:**

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

**PHMSA Representative:** Clint Stephens

State Liaison

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

**Name/Title:** Mr. Art Graham, Chairman

**Agency:** Florida Public Service Commission

**Address:** 2540 Shumard Oak Blvd

**City/State/Zip:** Tallahassee, FL 32399-0868

## 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
47	46.5
15	14
6	6
8	8
11	11
0	0
0	0

### TOTALS

**110 108.5**

**State Rating** .....

**98.6**

## PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- |  | 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:

Floralá was added as a municipal operator in 2018 and was inspected in 2019. There seemed to be no accuracy issues in Attachment 1 of Progress Report.

- |   |   |   |
|---|---|---|
| <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:

Data in Attachment 2 of Progress Report seems accurate as documented.

- |   |   |   |
|---|---|---|
| <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:

Floralá was added as a municipal operator in 2018 and was inspected in 2019. Data in Attachment 3 of Progress Report seems accurate as documented.

- |   |   |   |
|---|---|---|
| <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:

There were no reportable incidents in 2018, and this was confirmed in PDM.

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

Evaluator Notes:

Data in Attachment 5 of Progress Report seems accurate as documented.

- |  |   |   |
|--|---|---|
| <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:

Pipeline program files were well-organized and accessible electronically through there gas safety 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:

Compared information from TQ Training database, and information in Attachment 7 seems accurate.

- |  |   |   |
|--|---|---|
| <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:

There were no changes with rules and amendments for 2018. There were no issues with 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:

Florida PSC has done a good job of listed present accomplishments, and future endeavors in detail in Attachment 10 of Progress Report. Also, detailed information on damage prevention program is listed.

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10 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

There were no issues identified in Part A.

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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. | 2 | 2 |
|---|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

The procedure is outlined in SOP 1111, pages 27 and 28. There were no issues.

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

The procedure for IMP is outlined in SOP 1113, pages 30 ? 165. The procedure for DIMP is outlined in SOP 1129, pages 270 ? 309. There were no issues.

- |   |  |   |   |
|---|--|---|---|
| 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 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

The OQ procedure is outlined in SOP 1126 and 1127, pages 233 ? 251. There were no issues.

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

The Damage Prevention inspection procedures are outlined in SOP 1116 and 1124, pages 169 ? 184, & 221. There were no issues.

- |   |  |   |   |
|---|--|---|---|
| 5 | Any operator training conducted should be outlined and appropriately documented as needed. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

The procedure is outlined in SOP 1118, but needs to add more detail when on-site training is needed or requested.

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

The construction procedures are outlined in SOP 1121, pages 209 ? 210. There were no issues.

- |   |   |   |   |
|---|---|---|---|
| 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 ☒ No ☐ Needs Improvement ☐

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

**Evaluator Notes:**

The procedures are outlined in SOP 1111, page 26. Compliance inspections are required on an annual basis, not to exceed 15 months. A complete inspection is required every 5 years.

**8 General Comments:**

Info Only Info Only

Info Only = No Points

**Evaluator Notes:**

Suggested to Florida PSC to revise procedures to include more detail when on-site training is needed or requested. There were no issues in Part B.

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):  
901.10

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
220 X 9.00 = 1980.00

Ratio: A / B  
901.10 / 1980.00 = 0.46

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

Evaluator Notes:

Ratio = A/B = 901/220 x 9 = .45 > .38

- 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 <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:

Each inspector and program manager has fulfilled the T Q training requirements. This was verified through the TQ training database.

- 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. Program Manager displayed 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:

Yes. The state responded to Chairman's letter within 60 days and addressed any 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:

Florida PSC conducted its last pipeline safety seminar on June 11-12, 2018.

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

Evaluator Notes:

Yes. The Florida PSC inspected all types of operators and inspection units in accordance with the time intervals established in their SOP.

- 
- |          |   |   |   |
|----------|---|---|---|
| <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?<br>Chapter 5.1<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|
- 

Evaluator Notes:

1. The Florida PSC did not satisfactory complete all portions of the inspection form. Upon reviewing numerous inspections, The GS-03 O&M Inspection forms did not have explanations for N/A and N/C selections. Without this documented information, all staff would not be able to determine the reasons why specific items were considered N/A and N/C for future inspection preparations. Furthermore, this information is important for documenting possible changes in a pipelines operator's procedures, records, or facilities. This issue will be revisited during the next state evaluation.

- 
- |          |  |   |   |
|----------|--|---|---|
| <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?<br>(NTSB) Chapter 5.1<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|
- 

Evaluator Notes:

This question is included in the GS-3 O&M form pages 11 and 12. There were no issues.

- 
- |          |  |   |     |
|----------|--|---|-----|
| <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 | 0.5 |
|----------|--|---|-----|
- 

Evaluator Notes:

The Florida PSC had not reviewed operator procedures for surveillance of cast iron pipelines as it pertains to taking appropriate action as a result from tracking circumferential cracking failures. The Florida PSC stated question will be added to standard O&M inspection checklist.

- 
- |           |   |   |   |
|-----------|---|---|---|
| <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:

This question is included in the GS-3 O&M form page 4, question 19. No issues.

- 
- |           |  |   |   |
|-----------|--|---|---|
| <b>11</b> | 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<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|
- 

Evaluator Notes:

This question is included in the GS-3 O&M form page 5, 192.617. No issues.

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

Evaluator Notes:

Yes. The Florida PSC analyzes data from the annual reports for trends, and uses that information to check for accuracy. This data is put in spreadsheets and graphed to analyze the data.

- 
- |           |  |   |   |
|-----------|--|---|---|
| <b>13</b> | 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:

Yes. This question is included in the GS-13 ? Summary sheet which is included in every Florida PSC inspection checklist.

- |           |   |   |   |
|-----------|---|---|---|
| <b>14</b> | 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:

Yes. The Florida PSC is performing a D&A inspection with every standard inspection. Will be using Form 13, comprehensive D&A inspection form in 2019.

- |           |   |   |   |
|-----------|---|---|---|
| <b>15</b> | 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:

Yes. The Florida PSC is performing OQ program inspections annually, along with the standard inspections for smaller operators. Inspections for larger operators is performed at the corporate office on annual basis.

- |           |   |   |   |
|-----------|---|---|---|
| <b>16</b> | 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:

Yes. The Florida PSC is in contact with the larger operators on an annual basis to discuss integrity management issues. IMP inspections are performed on a five-year interval.

- |           |  |   |   |
|-----------|--|---|---|
| <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 | 2 | 2 |
|-----------|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. The Florida PSC is performing a comprehensive DIMP program inspection on an annual basis for each gas distribution operator.

- |           |   |   |   |
|-----------|---|---|---|
| <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 | 2 | 2 |
|-----------|---|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

The Florida PSC is performing public awareness program inspections on annual basis. There were 79 PA inspections performed in 2018.

- |           |   |   |   |
|-----------|---|---|---|
| <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). | 1 | 1 |
|-----------|---|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The Florida PSC website communicates information to effected stakeholders and the public pertaining to 811, pipeline safety program (annual reports, gas maps, etc.), and call before you dig info.

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

Evaluator Notes:

The Florida PSC has no open SRC reports.

- 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:

There is operator (TECO ? Peoples Gas) within the State of Florida with Aldyl A plastic pipe which is under replacement program.

- 22** Did the state participate in/respond to surveys or information requests from NAPSRS or PHMSA? 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes. The Florida PSC participated in/responded to surveys or confirmation requests from NAPSRS or 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 NA  
No = 0 Needs Improvement = .5 Yes = 1

Evaluator Notes:

There are no waivers or special permits for any operators in the State of Florida.

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

Evaluator Notes:

Yes. The Florida PSC did attend the NAPSRS National Meeting in Santa Fe, NM in 2018.

- 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 with the Florida PSC, and found no negative trends after analyzing data.

- 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 Florida PSC submitted their SICT calculation at 824 inspection person days for CY2018. Progress Report- Attachment 2 indicates 901 person days for CY2018. There were no issues.

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

Evaluator Notes:

The Florida PSC does not have a hazardous liquid program.

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**28** General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

The following issues were identified in Part C:

1. Inspection forms did not have explanations for N/A and N/C selections on the GS-03 O&M Inspection form.
2. The Florida PSC has not reviewed operator surveillance of cast iron piping for tracking circumferential cracking failures.

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Total points scored for this section: 46.5  
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 4 4  
Yes = 4 No = 0 Needs Improvement = 1-3
- a. Procedures to notify an operator (company officer) when a noncompliance is identified Yes ☒ No ☐ Needs Improvement ☐
- b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns Yes ☒ No ☐ Needs Improvement ☐
- c. Procedures regarding closing outstanding probable violations Yes ☒ No ☐ Needs Improvement ☐

**Evaluator Notes:**

The procedure is outlined in SOP 1123, pages 54 and 55. There were no issues.

- 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 4 4  
Yes = 4 No = 0 Needs Improvement = 1-3
- a. Were compliance actions sent to company officer or manager/board member if municipal/government system? Yes ☒ No ☐ Needs Improvement ☐
- b. Document probable violations Yes ☒ No ☐ Needs Improvement ☐
- c. Resolve probable violations Yes ☒ No ☐ Needs Improvement ☐
- d. Routinely review progress of probable violations Yes ☒ No ☐ Needs Improvement ☐
- 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 ☒ No ☐ Needs Improvement ☐
- f. Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. Yes ☒ No ☐ Needs Improvement ☐

**Evaluator Notes:**

Reviewed numerous inspection reports and were found to follow procedures from discovery to resolution, and adequately document all probable violations. These compliance actions were sent to a company officer or manager of municipal.

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

**Evaluator Notes:**

The Florida PSC did not issue compliance actions for all probable violations discovered? Upon review of Inspection report GS-1429 (Okaloosa Gas District), dated November 8, 2018, it was discovered that a compliance action was not issued for a probable violation listed on the IMP inspection form.

- 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:**

Yes. The operators were given reasonable due process for all compliance actions.

- 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 state process for imposing civil penalties. There were incidents/accidents in 2018.

- 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:

The Florida PSC did not access any fines for pipeline safety violations in 2018.

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7 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

There was one issue identified in Part D:

Inspection report GS-1429 (Okaloosa Gas District), dated November 8, 2018 did not issue compliance action for all probable violations listed on the IMP inspection form.

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Total points scored for this section: 14  
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:

The procedure is outlined in SOP 1107, page 22 and 23. The incident is documented on the GS-10 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:

There is a memo sent to every operator on annual basis with the contact information for program manager (PM) and engineer located in the area of the incident. The program manager is on call 24 hours, and local engineer is next on list to be contacted if PM not available.

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

Evaluator Notes:

There were no reportable incidents in CY2018.

- 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 CY2018.

- 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 CY2018.

- 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:

Yes. Florida PSC assisted AID with incident investigation on Buckeye Pipeline in CY2018. Excavation leak on jet fuel line.

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

Evaluator Notes:

Yes. The Florida PSC shares lessons learned during the State of State address during the NSPSR regional meeting.

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**8** General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

There were no issues in Part E.

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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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

The procedure is outlined in GS-3 form, page 3 under 192.614.

- |   |  |   |   |
|---|--|---|---|
| 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?<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Florida PSC does include Part 192.614 ? Damage Prevention in its Standard O&M inspections. Sunshine 811 has authority over State Damage Prevention Program, but has been deemed inadequate by PHMSA.

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

Evaluator Notes:

Sunshine 811 has collected the data, but does not differentiate damages per utility operator. Florida PSC has collected data from annual reports on Dig-in Damages. There has been an increase in damages from 2012 to 2018.

- |   |  |   |   |
|---|--|---|---|
| 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)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Sunshine 811 has collected the data, but does not differentiate damages per utility operator. Florida PSC has collected data from annual reports on Dig-in Damages. There has been an increase in damages from 2012 to 2018.

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

Evaluator Notes:

There were no issues in Part F.

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:

Florida City Gas

Name of State Inspector(s) Observed:

Marcelina Alvarez

Location of Inspection:

Miami, FL

Date of Inspection:

May 21-23, 2019

Name of PHMSA Representative:

Clint Stephens

Evaluator Notes:

PHMSA representative observed Florida state inspector perform a standard field inspection on Florida City Gas.

- 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's representative was notified and was present during the 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 the Florida Standard field inspection form as a guide 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 the results of the inspection.

- 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 the odorometer for performing odorant test; the volt meter and half cell for checking cathodic protection; gas tek monitor for checking methane releases; valve wrench for operating pipeline valves; and gauges for checking set points for overpressure protection.

- 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 reviewed cathodic and over pressure protection records during the inspection. Field activities included, overpressure protection tests, cathodic protection test, odorant test, marker sign locations, and valve operation.

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

Evaluator Notes:

The inspector did not conduct an exit interview. The inspection was not complete during the week of the evaluation.

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

Evaluator Notes:

There was no exit interview during the evaluation. Inspection was not complete at the time.

- |    |   |           |           |
|----|---|-----------|-----------|
| 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.<br>Info Only = No Points | Info Only | Info Only |
|----|---|-----------|-----------|

- |    |                                   |                                     |
|----|-----------------------------------|-------------------------------------|
| a. | Abandonment                       | <input type="checkbox"/>            |
| b. | Abnormal Operations               | <input type="checkbox"/>            |
| c. | Break-Out Tanks                   | <input type="checkbox"/>            |
| d. | Compressor or Pump Stations       | <input type="checkbox"/>            |
| e. | Change in Class Location          | <input type="checkbox"/>            |
| f. | Casings                           | <input checked="" type="checkbox"/> |
| g. | Cathodic Protection               | <input checked="" type="checkbox"/> |
| h. | Cast-iron Replacement             | <input 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 checked="" type="checkbox"/> |
| n. | Liaison with Public Officials     | <input type="checkbox"/>            |
| o. | Leak Surveys                      | <input type="checkbox"/>            |
| p. | MOP                               | <input type="checkbox"/>            |
| q. | MAOP                              | <input checked="" type="checkbox"/> |
| r. | Moving Pipe                       | <input type="checkbox"/>            |
| s. | New Construction                  | <input type="checkbox"/>            |
| t. | Navigable Waterway Crossings      | <input type="checkbox"/>            |
| u. | Odorization                       | <input checked="" type="checkbox"/> |
| v. | Overpressure Safety Devices       | <input checked="" type="checkbox"/> |
| w. | Plastic Pipe Installation         | <input 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 checked="" type="checkbox"/> |
| C. | Tapping                           | <input type="checkbox"/>            |
| D. | Valve Maintenance                 | <input checked="" type="checkbox"/> |

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

Evaluator Notes:

There were no issues identified during the week of the evaluation; however, the inspector did a good job of observing regulator station signs, above ground piping for atmospheric corrosion, cp and rectifier tests, valve operation, overpressure protection set points, and odorant test.

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



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

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

Evaluator Notes:

Florida PSC is not an interstate agent.

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

Evaluator Notes:

Florida PSC is not an interstate agent.

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

Evaluator Notes:

Florida PSC is not an interstate agent.

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

Evaluator Notes:

Florida PSC is not an interstate agent.

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

Evaluator Notes:

Florida PSC is not an interstate agent.

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

Evaluator Notes:

Florida PSC is not an interstate agent.

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

Evaluator Notes:

Florida PSC is not an interstate agent.

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>8</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

Florida PSC 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**

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

Evaluator Notes:

Florida PSC does not have a 60106 certification agreement.

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

Evaluator Notes:

Florida PSC does not have a 60106 certification agreement.

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

Evaluator Notes:

Florida PSC does not have a 60106 certification agreement.

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

Evaluator Notes:

Florida PSC does not have a 60106 certification agreement.

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

Evaluator Notes:

Florida PSC does not have a 60106 certification agreement.

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

Evaluator Notes:

Florida PSC does not have a 60106 certification agreement.

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>7</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

Florida PSC does not have a 60106 certification agreement.

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