



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

CT Dept of Energy and Env Protection

Document Legend

PART:

- O -- Representative Date and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- Program Performance
- D -- Compliance Activities
- E -- Incident Investigations
- F -- Damage Prevention
- G -- Field Inspections
- H -- Interstate Agent State (If Applicable)
- I -- 60106 Agreement State (If Applicable)



2018 Gas State Program Evaluation -- CY 2018

Gas

State Agency: Connecticut

Agency Status:

Date of Visit: 05/06/2019 - 05/10/2019

Agency Representative: Karl Baker, Public Utilities Supervisor of Technical Analysis

PHMSA Representative: Agustin Lopez, State Programs

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

Name/Title: Marissa Gillett, Chairman

Agency: Public Utilities Regulatory Authority

Address: 10 Franklin Square

City/State/Zip: New Britain, Connecticut 06051

Rating:

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

Interstate Agent: Yes

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
46	46
15	15
11	11
8	8
12	12
7	7
0	0

TOTALS

122 122

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:

Track days and inspections on Pipeline Safety Database. Verified with PDM and annual reports. No issues found in the review.

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

Evaluator Notes:

Inspection days are kept in the DEEP Pipeline Safety database. Verified days submitted in 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 |
|---|--|---|---|

Evaluator Notes:

Verified operators submitted in progress report with PDM and annual reports.

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

Evaluator Notes:

Yes, there were two incidents in PDM which were submitted in the Progress Report.

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

Evaluator Notes:

Compliance activities are tracked in their Violation report which tracks the progress of compliance activities. Verified information submitted in 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 |
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Evaluator Notes:

Yes, files are kept electronically.

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

Evaluator Notes:

Yes, verified inspector training on T&Q Blackboard and compared to list on Progress Report.

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

Evaluator Notes:

Yes, automatically adopt all federal regulations.

- 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:

GOALS: Maintain accelerated cast-iron and bare steel replacement across all distribution operators. Achieve 100% score on PHMSA evaluation of our state program. Reduce excavation damages. Gas Pipeline damages per 1,000 tickets is down to 1.3.

ACCOMPLISHMENTS: Maintained accelerated cast-iron and bare steel replacement. Received 100% score for 2017 PHMSA program audit and believe that we have performed successfully again in 2018 to receive another 100% score. Continued with streamlined civil penalty process for excavation damages. Worked on revising State pipeline safety regulations and statutes.

10 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

The CT DEEP is mainly complying with Part A of the 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:

Administrative Procedures Section 7, 10 and 11 have inspection procedures which give guidance to inspectors to perform inspections. The procedures include pre and post inspection activities.

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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:

Administrative Procedures Section 7, 10 and 11 have IMP and DIMP inspection procedures which give guidance to inspectors to perform inspections. The procedures include pre and post inspection activities.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Administrative Procedures Section 7, 10 and 11 have OQ inspection procedures which give guidance to inspectors to perform inspections. The procedures include pre and post inspection activities.

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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:

Administrative Procedures Section 7, 10 and 11 have Damage Prevention inspection procedures which give guidance to inspectors to perform inspections. The procedures include pre and post inspection activities.

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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:

Administrative Procedures Section 7, 10 and 11 have Operator Training inspection procedures which give guidance to inspectors to perform inspections. Operator Training is conduct upon request by operators or if the GPSU determines if there is a need for such training.

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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. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Administrative Procedures Section 7, 10 and 11 have inspection procedures which give guidance to inspectors to perform inspections. The procedures include pre and post inspection activities. Construction inspections are performed as necessary.

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

Evaluator Notes:

Yes, Section 10 of Administrative Procedures has procedures that address the prioritization of inspections. It takes the following into consideration:

- (a) The length of time since the last inspection
- (b) The operating history of the inspection unit (leak history, unaccounted-for gas, prior violations, accident/incident history, any other information available from the Operator's annual reports, etc.)
- (c) Types of activities being undertaken by the inspection unit (construction, recent changes in personnel and procedures, etc.)
- (d) Locations of Operator's inspection units being inspected - (Geographic area, Population Density, etc.)
- (e) Threats to the facilities (Excavation damage, corrosion, natural forces, other outside forces, material or welds, equipment, operations)
- f) Yes, Section 6 defines an inspection unit.

8 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The CT DEEP is mainly complying with Part B of the 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):
472.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 4.55 = 1001.00

Ratio: A / B
472.00 / 1001.00 = 0.47

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

Evaluator Notes:

The total inspection person-days to total person days ratio met the requirement.

- 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:

- a. Yes, all inspectors are qualified to lead each type of inspections performed. Program Manager
- b. Yes inspectors who lead DIMP/IMP are qualified inspectors.
- c. Yes, all inspectors have completed the root cause course.
- d. Northwest Gas Association has a training school for pipeline safety which some of the inspectors attend.
- e. Inspectors are qualified to perform each applicable inspection.

- 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, Karl Baker is very knowledgeable of the pipeline safety program rules 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 respond required.

- 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:

October 9-10, 2018 was the last seminar held in Meredith, NH. The New England states participate/co-host the the seminar.

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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:

Yes, types of inspections are tracked in the database and discussed yearly during the staff meeting. Reviewed inspection reports and database to verify all units are being inspected in accordance to their 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:

Yes, use IA for comp inspections and use PHMSA form for standard inspection. Reviewed inspection reports to verify the completeness of each inspection form.

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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 |
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Evaluator Notes:

Inspectors review during O&M inspections. There are 3 Distribution companies and one public utility which still have cast iron.

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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:

Yes, the NTSB and Advisory bulletin questions have been incorporated into their Inspection forms. The questions are reviewed with the operator during O&M Inspections.

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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:

Yes, the NTSB and Advisory bulletin questions have been incorporated into their Inspection forms and are reviewed during inspections.

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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:

Yes, the NTSB and Advisory bulletin questions have been incorporated into their Inspection forms and are reviewed during inspections. The inspectors review during the O&M Inspections and during review of one-call damages that are reported to the GPSU.

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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:

Review and analyze of Operator Annual Reports are performed annually (reviewed PIPEDATA.XLS located in S:\GasPipelineSafetyUnit\GASPIPE\Undergrnd Facilities). As part of investigation of incidents/accidents, incident/accident

data is reviewed for accuracy and to ensure that operators correctly file appropriate PHMSA incident forms. Trends, program effectiveness and a check for operator issues is performed by using leak response time data, class 2 leak backlog data, third-party damage data and cast iron/bare steel replacement program data.

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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:

There are no intrastate transmission pipelines in CT. The CT DEEP has reviewed NPMS data on interstate operators and compared with PDM.

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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:

Yes conduct Drug and Alcohol inspections to verify operators are in compliance with 49 CFR 199. Annual field inspections are performed on all intrastate operators that are required to have the program. In addition, an annual review of the Drug and Alcohol Testing MIS Data Collection forms is performed. Verification is made that any positive tests are responded to in accordance with the operator's program.

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| 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:

Yes, CT conducts OQ Program inspections and field protocol 9 on all operators.

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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:

No intrastate transmission pipelines in Connecticut.
GPSU has taken part in IMP inspections of interstate operators as part of interstate annual inspection plan.

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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:

Yes, the CT DEEP conducts DIMP inspections of their distribution and propane operators per their procedures. Reviewed inspection reports to verify inspections are being conducted.

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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:

Yes, the CT DEEP performed PAPEI audits on all LDCs and Norwich Public Utilities in 2012 and 2017.

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

Evaluator Notes:

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

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

Evaluator Notes:

There were no Safety Related Conditions reported in 2018.

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

Evaluator Notes:

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

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

Evaluator Notes:

Yes. Karl Baker responds to NAPSRS and PHMSA surveys.

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

Evaluator Notes:

There are no waivers issued by DEEP.

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

Evaluator Notes:

Yes, Carl Baker attended the National NAPSRS Meeting.

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

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|----|---|--------------------------------------|--------------------------|---|
| a. | Discussion of Potential Accelerated Actions (AA's) based on any negative trends | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | NTSB P-11-20 Meaningful Metrics | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

Program Manager was familiar with the metrics and understood the reasons behind the trends. Perform analysis on data to find negative trends.

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

Discussed SICT for accuracy and there are no issues with the days calculated. Do not foresee any issues in the future.

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

The ADP was issued to only transmission pipeline operators and there are no transmission pipelines in the state.

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| 28 | General Comments:
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

The CT DEEP is mainly complying with Part C of the Evaluation.

Total points scored for this section: 46
Total possible points for this section: 46



PART D - Compliance Activities

Points(MAX) Score

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

Evaluator Notes:

Yes, the CT Administrative Procedures Section 12, 13 and 14 address the steps taken from the discovery to the resolution of probable violations.

- a. Notifications are sent to company officials.
- b. Routinely review the progress of compliance actions.
- c. Procedures address the closure of probable violations.

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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:

Yes, reviewed compliance letters and inspection reports to verify that probable violations are being resolved.

- a. Yes, reviewed inspection reports to assure letters are sent to company officials.
- b. Yes, CT documents all probable violations.
- c. Yes, reviewed compliance actions to assure violations are being resolved.
- d. Yes, open compliance cases are reviewed until closed.
- e. Yes, post inspection briefing is performed at conclusion of each inspection.
- f. Yes, compliance actions are communicated with operators within 90 days.

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

Yes, reviewed files to assure all probable violations discovered are being addressed.

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| 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, reasonable due process is given to all parties.

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|----------|---|---|---|
| 5 | Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken) | 2 | 2 |
|----------|---|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, Karl Baker is very familiar with the civil penalty process. The DEEP issued civil penalties 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:

Yes, the DEEP issued civil penalties in 2018 which demonstrates they are using their authority.

7 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

The CT DEEP is mainly complying with Part D of the 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:

Administrative Procedures Section 21 addresses state actions in the event of an incident.

- 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:

Administrative Procedures Section 21. GPSU inspectors are on call to handle incident notifications 24 hours a day.

- 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:

There were two interstate pipeline incidents reported in which the DEEP investigated. There were no incidents which were not investigated.

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

Evaluator Notes:

There were two interstate pipeline incidents which the DEEP inspectors investigated thoroughly and documented investigation.

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

Evaluator Notes:

There were no compliance actions issued in result of an incident/accident investigation.

- 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, the DEEP assists the AID in following up on incidents thru email and phone calls. If needed they go onsite. The DEEP is an interstate agent and investigate incidents on interstate pipeline operators.

- 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:

Incidents/accidents have been presented at NAPSIR meetings and pipeline safety seminars. In addition, all incident/accident reports are sent to all applicable operators in the state for their review and response to any applicable recommendations included in the report.

8 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

The GPSU is mainly in compliance with Part E of the Evaluation.

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



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:

Yes, the question was incorporated into the standard inspection form and is verified during inspections.

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

Performed review during O&M audits. Last audits performed on 3 LDCs and Norwich in 2015, 2017 and 2019. This is also accomplished during normal review of One-Call damages that are reported to the GPSU.

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

Evaluator Notes:

The GPSU has performed a review of the CGA Best Practices document and determined that all pertinent best practices are included in the state regulations. CT revised their underground damage prevention laws in 2016. State program has adopted the 9 elements.

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

Evaluator Notes:

Approximately twice per year the damage prevention data is reviewed to determine trends. These trends are reviewed to determine where emphasis is to be placed. These trends are also reviewed with the Call Before You Dig Public Awareness Committee and where appropriate, the public awareness campaigns are modified.

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

Evaluator Notes:

The CT DEEP is mainly complying with Part F of the 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 Only Info Only
Info Only = No Points

Name of Operator Inspected:

1) All Gas Propane; 2 and 3) Connecticut Natural Gas

Name of State Inspector(s) Observed:

1) Bruce Benson; 2) Daniel Nivison; 3) Daniel Tomasino

Location of Inspection:

1) Hartford ; 2) New Britain; 3) Hartford

Date of Inspection:

May 8, 2019

Name of PHMSA Representative:

Agustin Lopez, PHMSA State Programs

Evaluator Notes:

- 1) Evaluated Mr. Bruce Benson while conducting an standard inspection on All Gas Propane.
2) Evaluated Mr. Daniel Nivison while conducting an inspection of Connecticut Natural Gas perform regulator inspections.
3) Evaluated Mr. Daniel Tomasino while conducting a construction inspection of Connecticut Natural Gas installing 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's were notified in advance to allow the operator to have a representative present. During LP inspection the operator is not present due to scheduling and logistics of inspections.

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

Evaluator Notes:

The inspectors all used the appropriate form for each type of inspection.

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

Evaluator Notes:

Yes, each inspector documented the results of the inspection on the forms.

- 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, during the inspections, the inspectors observed the technicians perform their tasks and verified the correct equipment was being utilized.

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

- a. Procedures ☒
b. Records ☒
c. Field Activities ☒
d. Other (please comment) ☐

Evaluator Notes:

- 1) I evaluated Mr. Bruce Benson while performing a field inspection of a propane system. There were no records or procedures reviewed during the evaluation.
- 2) I evaluated Mr. Daniel Nivison while performing an inspection of regulator inspections. Procedures were on hand to assure the technicians were performing the inspections per procedures.
- 3) I evaluated Mr. Daniel Tomasino while performing a construction inspection. There were procedures on hand to verify technicians performing work per the procedures.

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
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Evaluator Notes:

Yes, all three inspectors are very knowledgeable of the pipeline safety rules 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
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Evaluator Notes:

For the construction and regulator inspection, both inspectors closed the inspections with an exit interview. As for the propane inspection, the operator was not present so an exit briefing will be conducted on a later date.

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

There were no issues found during the inspections.

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

Evaluator Notes:

All three inspectors were very observant in the field.

1) Mr. Benson verified the propane system was in compliance with the regulations. He inspected the vents, tank, and propane facility.

2) Mr. Nivison inspected the regulator inspections being conducted by the operator.

3) Mr. Tomasino conducted a construction inspection of the operator installing plastic service lines.

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



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

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

Evaluator Notes:

State uses IA to document inspections.

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

Evaluator Notes:

State followed Eastern Region inspection plan.

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|----------|--|---|---|
| 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 | 1 |
|----------|--|---|---|

Evaluator Notes:

State submitted required data to Marta Riendeau, Eastern Region.

- | | | | |
|----------|---|---|---|
| 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 | 1 |
|----------|---|---|---|

Evaluator Notes:

State submitted required data to Marta Riendeau, Eastern Region.

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|----------|---|---|---|
| 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 | 1 |
|----------|---|---|---|

Evaluator Notes:

No imminent safety hazards found in CY 2018.

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|----------|--|---|---|
| 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 | 1 |
|----------|--|---|---|

Evaluator Notes:

State submitted required data to Marta Riendeau, Eastern Region.

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

Evaluator Notes:

State submitted required data to Marta Riendeau, Eastern Region.

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

The CT DEEP is mainly complying with Part H of the Evaluation.

Total points scored for this section: 7
Total possible points for this section: 7

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

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

Evaluator Notes:

CT DEEP dos not have a 60106 Certification.

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

CT DEEP dos not have a 60106 Certification.

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

Evaluator Notes:

CT DEEP dos not have a 60106 Certification.

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

CT DEEP dos not have a 60106 Certification.

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

CT DEEP dos not have a 60106 Certification.

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

CT DEEP dos not have a 60106 Certification.

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

Evaluator Notes:

CT DEEP dos not have a 60106 Certification.

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