



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

1200 New Jersey Avenue SE  
Washington DC 20590

# 2010 Natural Gas State Program Evaluation

for

FLORIDA PUBLIC SERVICE COMMISSION, Bureau of Safety

## Document Legend

### PART:

- O -- Representative Date and Title Information
- A -- General Program Qualifications
- B -- Inspections and Compliance - Procedures/Records/Performance
- C -- Interstate Agent States
- D -- Incident Investigations
- E -- Damage Prevention Initiatives
- F -- Field Inspection
- G -- PHMSA Initiatives - Strategic Plan
- H -- Miscellaneous
- I -- Program Initiatives



2010 Natural Gas State Program Evaluation -- CY 2010  
Natural Gas

**State Agency:** Florida

**Agency Status:**

**Date of Visit:** 10/03/2011 - 10/07/2011

**Agency Representative:** Rick Moses, Bureau Chief  
Bob Trotter, Utilities System Communications Engineer

**PHMSA Representative:** Don Martin

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

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

**Agency:** Florida Public Service Commission

**Address:** 2540 Shumard Oak Blvd.

**City/State/Zip:** Tallahassee, FL 32399-0850

**Rating:**

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

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**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 2010 (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 certification/agreement attachments provide the basis for determining the state's pipeline safety grant allocation.

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**Field Inspection (PART F):**

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

**Scoring Summary**

**PARTS**

	Possible Points	Points Scored
A General Program Qualifications	26	23
B Inspections and Compliance - Procedures/Records/Performance	24.5	24
C Interstate Agent States	0	0
D Incident Investigations	7	7
E Damage Prevention Initiatives	9	9
F Field Inspection	12	12
G PHMSA Initiatives - Strategic Plan	9.5	9.5
H Miscellaneous	3	3
I Program Initiatives	9	9

**TOTALS**

**100 96.5**

**State Rating** ..... **96.5**

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## PART A - General Program Qualifications

Points(MAX) Score

- |          |  |                                     |   |
|----------|--|-------------------------------------|---|
| <b>1</b> | Did the state submit complete and accurate information on the attachments to its most current 60105(a) Certification/60106 (a) Agreement? (NOTE: PHMSA Representative to verify certification/agreement attachments by reviewing appropriate state documentation. Score a deficiency in any one area as "needs improvement". Attachment numbers appear in parenthesis) Previous Question A.1, Items a-h worth 1 point each<br>Yes = 8 No = 0 Needs Minor Improvement = 3-7 Needs Major Improvement = 2 | 8                                   | 7 |
| <hr/>    |  |                                     |   |
| a.       | State Jurisdiction and agent status over gas facilities (1)  | <input checked="" type="checkbox"/> |   |
| b.       | Total state inspection activity (2)  | <input checked="" type="checkbox"/> |   |
| c.       | Gas facilities subject to state safety jurisdiction (3)  | <input checked="" type="checkbox"/> |   |
| d.       | Gas pipeline incidents (4)   | <input checked="" type="checkbox"/> |   |
| e.       | State compliance actions (5)   | <input checked="" type="checkbox"/> |   |
| f.       | State record maintenance and reporting (6)   | <input checked="" type="checkbox"/> |   |
| g.       | State employees directly involved in the gas pipeline safety program (7)   | <input checked="" type="checkbox"/> |   |
| h.       | State compliance with Federal requirements (8)   | <input checked="" type="checkbox"/> |   |

### SLR Notes:

Upon a review of the attachments to the FLPSC's 2010 Certification, Compliance information on Attachment 5 appears to have an error on the number of Probable Violations (PV) that would be carried over to 2012. It was reported that 11 PVs were carried over from previous years, 79 PVs were discovered during 2010 with 78 PVs corrected during 2010. This would indicate that there were 12 PVs to be corrected at the end of 2010. The FLPSC reported 63 PVs to be corrected at the end of 2010 - a difference of 51 PVs. This was inaccurate. One point was deducted on Question A.1.

No other inaccuracies were found.

- |          |   |   |   |
|----------|---|---|---|
| <b>2</b> | Did the state have an adequate mechanism to receive operator reporting of incidents to ensure state compliance with 60105(a) Certification/60106(a) Agreement requirements (fatality, injury requiring hospitalization, property damage exceeding \$50,000 - Mechanism should include receiving "after hours" reports)? (Chapter 6) Previous Question A.2<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

### SLR Notes:

Yes. The FLPSC maintains a log of telephonic reports. The log contains both federal required reports and incident reports required by state regulations. Reports listed on Attachment 5 of the Certification were found on the log.

- |          |   |   |   |
|----------|---|---|---|
| <b>3</b> | Has the state held a pipeline safety TQ seminar(s) in the last 3 years? (NOTE: Indicate date of last seminar or if state requested seminar, but T&Q could not provide, indicate date of state request for seminar. Seminars must be held at least once every 3 calendar years.) (Chapter 8.5) Previous Question A.4<br>Yes = 2 No = 0 | 2 | 0 |
|----------|---|---|---|

### SLR Notes:

The FLPSC conducted its previous pipeline safety TnQ seminar in 2007. The FLPSC should have conducted a seminar in 2010 to meet the three year requirement. Two points were deducted for Question A.3.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Were pipeline safety program files well-organized and accessible?(NOTE: This also includes electronic files) (Chapter 5) Previous Question A.5<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

### SLR Notes:

Yes. The files were found to satisfactory.

- |          |   |   |   |
|----------|---|---|---|
| <b>5</b> | Did state records and discussions with the state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? (Chapter 4.1, Chapter 8.1) Previous Question A.6<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

### SLR Notes:

Although Mr. Moses has been in his position for less than a full year, he exhibited very good knowledge of the PHMSA pipeline safety program for state programs. Mr. Moses received an orientation on the pipeline safety program in 2010.

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Did the state respond in writing within 60 days to the requested items in the Chairman's letter following the Region's last program evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

### SLR Notes:

Yes. The response was received in 38 days.

- 7 What actions, if necessary, did the State initiate as a result of issues raised in the Chairperson's letter from the previous year? Did actions correct or address deficiencies from previous year's evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8/A.9 1 1  
Yes = 1 No = 0

SLR Notes:

The issues raised in the Chairman's letter requires action by the state legislature and is out of the control of the FLPSC. The FLPSC is limited in its ability to request changes to state law by direct communication with legislators. It is viewed as lobbying legislators which is not permissible.

## Personnel and Qualifications

- 8 Has each inspector fulfilled the 3 year TQ training requirement? If No, has the state been granted a waiver regarding TQ courses by the Associate Administrator for Pipeline Safety? (NOTE: If the State has new inspectors who have not attended all TQ courses, but are in a program which will achieve the completion of all applicable courses within 3 years of taking first course (5 years to successfully complete), or if a waiver has been granted by the applicable Region Director for the state, please answer yes.) (Chapter 4.4) Previous Question A.10 3 3  
Yes = 3 No = 0

SLR Notes:

Training requirements pertaining to the five year requirement have been met for the core courses.

- 9 Brief Description of Non-TQ training Activities: Info Only Info Only  
Info Only = No Points  
For State Personnel:  
  
For Operators:  
  
For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:

SLR Notes:

No significant non-T&Q training was identified during 2010.

- 10 Did the lead inspectors complete all required T&Q OQ courses and Computer Based Training (CBT) before conducting OQ Inspections? (Chapter 4.4.1) Previous Question A.12 1 1  
Yes = 1 No = 0

SLR Notes:

Yes. Upon a review of the OQ database and training records, the inspectors assigned to lead OQ inspections completed the required training prior to the time inspections were conducted.

- 11 Did the lead inspectors complete all required TQ Integrity Management (IMP) Courses/Seminars and CBT before conducting IMP Inspections? (Chapter 4.4.1) Previous Question A.13 1 1  
Yes = 1 No = 0

SLR Notes:

Upon a review of the IMP database there were no IMP inspections conducted in 2010. It should be noted that beginning in 2011 no inspectors have completed all of the required courses within the required timeframe. Therefore, if future IMP inspections are conducted the lead inspector assigned will need to complete the training requirements before conducting the inspection to avoid a loss of a point on this question in future evaluations.

- 12 Was the ratio acceptable of Total inspection Person-days to Total Person-days charged to the program by state inspectors? (Region Director may modify points for just cause) (Chapter 4.3) Previous Question B.12 5 5  
Yes = 5 No = 0  
A. Total Inspection Person Days (Attachment 2):  
975.00  
B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
220 X 5.38 = 1184.33  
Ratio: A / B  
975.00 / 1184.33 = 0.82  
If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0  
Points = 5

SLR Notes:

The FLPSC had 975 inspection person days during 2010. This resulted in a ratio of .82.

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<b>13</b>	Have there been modifications or proposed changes to inspector-staffing levels? (If yes, describe) Previous      Info Only      Info Only
	Question B.13
	Info Only = No Points

SLR Notes:

One inspector was hired to fill the position vacated by Roger Fletcher.

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<b>14</b>	Part-A General Comments/Regional Observations	Info Only      Info Only
	Info Only = No Points	

SLR Notes:

Question A.1 - Upon a review of the attachments to the FLPSC's 2010 Certification, Compliance information on Attachment 5 appears to have an error on the number of Probable Violations (PV) that would be carried over to 2012. It was reported that 11 PVs were carried over from previous years, 79 PVs were discovered during 2010 with 78 PVs corrected during 2010. This would indicate that there were 12 PVs to be corrected at the end of 2010. The FLPSC reported 63 PVs to be corrected at the end of 2010 - a difference of 51 PVs. This was inaccurate. One point was deducted on Question A.1.

Question A.3 - The FLPSC conducted its previous pipeline safety TnQ seminar in 2007. The FLPSC should have conducted a seminar in 2010 to meet the three year requirement. Two points were deducted for Question A.3.

Question A.11 - Upon a review of the IMP database there were no IMP inspections conducted in 2010. It should be noted that beginning in 2011 no inspectors have completed all of the required courses within the required timeframe. Therefore, if future IMP inspections are conducted the lead inspector assigned will need to complete the training requirements before conducting the inspection to avoid a loss of a point on this question in future evaluations. No points were deducted for this evaluation.

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Total points scored for this section: 23  
Total possible points for this section: 26



## PART B - Inspections and Compliance - Procedures/Records/ Performance

Points(MAX) Score

### Inspection Procedures

- 1** Does the State have a written inspection plan to complete the following? (all types of operators including LNG) (Chapter 5.1) Previous Question B.1 + Chapter 5 Changes + Incorporate LNG 6.5 6.5  
Yes = 6.5 No = 0 Needs Improvement = 50% Deduction
- |   |   |                                      |                          |   |
|---|---|--------------------------------------|--------------------------|---|
| a | Standard Inspections (Including LNG) (Max points = 2) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b | IMP Inspections (Including DIMP) (Max points = .5)    | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c | OQ Inspections (Max points = .5)                      | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d | Damage Prevention (Max points = .5)                   | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e | On-Site Operator Training (Max points = .5)           | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f | Construction Inspections (Max points = .5)            | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| g | Incident/Accident Investigations (Max points = 1)     | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| h | Compliance Follow-up (Max points = 1)                 | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

#### SLR Notes:

The FLPSC procedures require each operator's systems to be inspected annually not to exceed fifteen months. The FLPSC determines if special or focus areas should be inspected based upon past inspection history.

- 2** Did the written Procedures for selecting operators adequately address key concerns? (Chapter 5.1) Previous Question B.2, items a-d are worth .5 point each 2 2  
Yes = 2 No = 0 Needs Improvement = 50% Deduction
- |   |  |                                      |                          |   |
|---|--|--------------------------------------|--------------------------|---|
| a | Length of time since last inspection   | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b | History of Operator/unit and/or location (including leakage , incident and compliance history) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c | Type of activity being undertaken by operator (construction etc)                               | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d | For large operators, rotation of locations inspected   | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

#### SLR Notes:

The FLPSC written procedures consider all of the factors shown above. The primary considerations in scheduling inspections are the length of time since the last inspection and past inspection results.

### Inspection Performance

- 3** Did the state inspect all types of operators and inspection units in accordance with time intervals established in its written procedures? (Chapter 5.1) Previous Question B.3 2 2  
Yes = 2 No = 0

#### SLR Notes:

Yes. Upon a review of the FLPSC 2010 inspection records, the FLPSC complied with the required inspections intervals in its inspection procedures.

- 4** Did the state inspection form cover all applicable code requirements addressed on the Federal Inspection forms? (Chapter 5.1 (3)) Previous Question B.4 1 1  
Yes = 1 No = 0

#### SLR Notes:

The FLPSC uses inspection forms that were developed by the FLPSC. Upon a review of the forms used by the FPSC, it appears that the forms cover all of the federal pipeline safety requirements and state requirements that are more stringent.

- 5** Did state complete all applicable portions of inspection forms? (Chapter 5.1 (3)) Previous Question B.5 1 1  
Yes = 1 No = 0

#### SLR Notes:

Upon a review of randomly selected inspection reports, the supporting inspection forms were completed on the applicable portions covered during the inspection.

- 6** Did the state initiate appropriate follow-up actions to Safety Related Condition Reports? (Chapter 6.3) Previous Question B.6 .5 NA  
Yes = .5 No = 0

#### SLR Notes:

There were no safety related condition reports filed by operators in 2010.

- |          |   |                 |    |
|----------|---|-----------------|----|
| <b>7</b> | Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Previous Question B.7 | .5              | .5 |
|          |   | Yes = .5 No = 0 |    |

**SLR Notes:**

The FPSC has reviewed operators' procedures related to graphitization of cast iron pipe since the NTSB recommendation was issued several years ago. The FLPSC provides operators with PHMSA Advisory Bulletins as they are published.

- |          |  |                 |    |
|----------|--|-----------------|----|
| <b>8</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) Previous Question B.8 | .5              | .5 |
|          |  | Yes = .5 No = 0 |    |

**SLR Notes:**

The FLPSC has mandated cast iron main replacement programs for its operators. The FLPSC mandate resulted from reviews of operators' leak history and pipeline facility failures. The FLPSC reviews operators' leak repair records and verifies that operators are noting whether cast iron leaks are resulting from circumferential cracking.

- |          |   |                 |    |
|----------|---|-----------------|----|
| <b>9</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) Previous Question B.9 | .5              | .5 |
|          |   | Yes = .5 No = 0 |    |

**SLR Notes:**

The FLPSC has reviewed all operators' operation and maintenance procedures to ensure that all leaks are repaired in a manner that does not pose a safety hazard to the public. The FLPSC reviews operators leak repair records as a part of its standard inspections.

- |           |  |                |   |
|-----------|--|----------------|---|
| <b>10</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? (NTSB) Previous Question B.10 | 1              | 1 |
|           |  | Yes = 1 No = 0 |   |

**SLR Notes:**

The FLPSC is involved in monitoring operators' response times to leak reports or other emergency notifications to operators. The FLPSC reviews operators' compliance with the requirements of 192.617 when it conducts standard inspections.

- |           |   |                       |    |
|-----------|---|-----------------------|----|
| <b>27</b> | 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) | Info Only             | NA |
|           |   | Info Only = No Points |    |

**SLR Notes:**

- |           |  |                       |           |
|-----------|--|-----------------------|-----------|
| <b>28</b> | Part B: General Comments/Regional Observations | Info Only             | Info Only |
|           |  | Info Only = No Points |           |

**SLR Notes:**

Question B.19 - Compliance notifications sent to Florida Utilities and TECO/Peoples Gas were sent to compliance managers designated as liaisons by their companies. However, company officers are normally vice presidents or higher positions that are placed in their positions by vote of the Board of Directors. 0.5 points were deducted for Question B.19.

## Compliance - 60105(a) States

- |           |   |                                       |   |
|-----------|---|---------------------------------------|---|
| <b>11</b> | Did the state adequately document sufficient information on probable violations? (Chapter 5.2) Previous Question B.14 | 1                                     | 1 |
|           |   | Yes = 1 No = 0 Needs Improvement = .5 |   |

**SLR Notes:**

Upon a review of randomly selected inspection report files all probable violations were described in detail.

- |           |   |                                       |   |
|-----------|---|---------------------------------------|---|
| <b>12</b> | Does the state have written procedures to identify the steps to be taken from the discovery to the resolution of a probable violation as specified in the "Guidelines for State Participating in the Pipeline Safety Program"? (Chapter 5.1) Previous Question D(1).1 | 1                                     | 1 |
|           |   | Yes = 1 No = 0 Needs Improvement = .5 |   |

**SLR Notes:**

The FLPSC procedures direct inspectors to notify operators as soon as possible after the discovery of a probable violation. The FLPSC is required to provide operators with written correspondence notifying the operator of a probable violation or safety concern.

- 
- |           |  |   |   |
|-----------|--|---|---|
| <b>13</b> | Does the state have written procedures to notify an operator when a noncompliance is identified as specified in the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(4)) Previous Question D(1).2<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|
- 

**SLR Notes:**

The FLPSC requires that operators be provided with written notification of any non-compliance that are found by the FLPSC. The FLPSC inspector also provides a briefing to the operator upon the conclusion of the inspection.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>14</b> | Does the state have a written procedure for routinely reviewing the progress of compliance actions to prevent delays or breakdowns of the enforcement process, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(5)) Previous Question D(1).3<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|
- 

**SLR Notes:**

The FLPSC tracks the progress of operators' corrective action. The FLPSC follows up with operators through telephonic contact or by conducting follow up inspections. The completion of corrective action is documented on the FLPSC's GS-12 form. The operator is notified in writing when the corrective action is accepted and the report is closed. Upon a review of randomly selected inspection files the follow up action was acceptable.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>15</b> | Has the State issued compliance actions for all probable violations discovered? (Note : PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation) Previous Question D(1).4<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|
- 

**SLR Notes:**

Upon a review of the FLPSC's 2010 inspection report log, the FLPSC documented the actions and dates of written correspondence for probable violations found during 2010.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>16</b> | Did the state follow its written procedures for reviewing compliance actions and follow-up to determine that prompt corrective actions were taken by operators, within the time frames established by the procedures and compliance correspondence, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? Previous Question D(1).5<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|
- 

**SLR Notes:**

Upon a review of the FLPSC's 2010 inspection report log, the FLPSC documented the responses to its written notifications. Based upon the information in the log, Operators responded to the FLPSC's notifications within the timeframe specified in the written notification from the FLPSC.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>17</b> | If compliance could not be established by other means, did state pipeline safety program staff request formal action, such as a "Show Cause Hearing" to correct pipeline safety violations? (check each states enforcement procedures) Previous Question D(1).6<br>No = 0 Yes = 1 | 1 | 1 |
|-----------|---|---|---|
- 

**SLR Notes:**

The FLPSC has administrative procedures that allow for a formal show cause hearing before the Commission. No show cause hearings were required in 2010 to require corrective action.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>18</b> | Did the state adequately document the resolution of probable violations? (Chapter 5.1 (6)) Previous Question D(1).7<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|
- 

**SLR Notes:**

The resolution of probable violations are documented in the inspection report file and on the "Gas Safety Violation Log".

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- |           |  |    |   |
|-----------|--|----|---|
| <b>19</b> | Were compliance actions sent to a company officer? (manager or board member if municipal/government system) (Chapter 5.1(4)) Previous Question D(1).8<br>Yes = .5 No = 0 | .5 | 0 |
|-----------|--|----|---|
- 

**SLR Notes:**

Compliance notifications sent to Florida Utilities and TECO/Peoples Gas were sent to compliance managers designated as liaisons by their companies. However, company officers are normally vice presidents or higher positions that are placed in their positions by vote of the Board of Directors. 0.5 points were deducted for Question B.19.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>20</b> | Did the compliance proceedings give reasonable due process to all parties? (check each states enforcement procedures) Previous Question D(1).9<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|
- 

**SLR Notes:**

The FLPSC's enforcement procedures provide operators with the ability to provide evidence of compliance to be considered by the FLPSC. Operators have the opportunity to request hearings with the FLPSC Commissioners to present their arguments.



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## Compliance - 60106(a) States

<b>21</b>	Did the state use the current federal inspection form(s)? Previous Question D(2).1 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

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<b>22</b>	Are results adequately documented demonstrating inspection units were reviewed in accordance with state inspection plan? Previous Question D(2).2 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

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<b>23</b>	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.) Previous Question D(2).3 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

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<b>24</b>	Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question D(2).4 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

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<b>25</b>	Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(2).5 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

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<b>26</b>	Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? Previous Question D(2).6 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

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Total points scored for this section: 24  
Total possible points for this section: 24.5



## PART C - Interstate Agent States

Points(MAX) Score

- |          |   |   |    |
|----------|---|---|----|
| <b>1</b> | Did the state use the current federal inspection form(s)? Previous Question D(3).1<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

SLR Notes:

The FPSC is not an interstate agent.

- |          |  |   |    |
|----------|--|---|----|
| <b>2</b> | Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? Previous Question D(3).2<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

SLR Notes:

The FPSC 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? Previous Question D(3).3<br>Yes = 1 No = 0 | 1 | NA |
|----------|--|---|----|

SLR Notes:

The FPSC is not an interstate agent.

- |          |   |   |    |
|----------|---|---|----|
| <b>4</b> | 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.) Previous Question D(3).4<br>Yes = 1 No = 0 | 1 | NA |
|----------|---|---|----|

SLR Notes:

The FPSC 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? Previous Question D(3).5<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

SLR Notes:

The FPSC is not an interstate agent.

- |          |  |   |    |
|----------|--|---|----|
| <b>6</b> | Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(3).6<br>Yes = 1 No = 0 | 1 | NA |
|----------|--|---|----|

SLR Notes:

The FPSC is not an interstate agent.

- |          |  |   |    |
|----------|--|---|----|
| <b>7</b> | Did the state initially submit documentation to support compliance action by PHMSA on probable violations? Previous Question D(3).7<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

SLR Notes:

The FPSC is not an interstate agent.

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

SLR Notes:

The FPSC is not an interstate agent.

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

## PART D - Incident Investigations

Points(MAX) Score

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Are state personnel following the procedures for Federal/State cooperation in case of an incident? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6.1) Previous Question E.1<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

### SLR Notes:

The FLPSC is knowledgeable of the cooperation procedures with PHMSA. The FLPSC has exercised the required cooperation during past incidents. Three reportable incidents occurred in 2010. Two incidents were caused by third party damage. The third incident involved equipment failure that resulted in the loss of service but did not cause a release of gas. The FLPSC followed the requirements described in the Appendices of the Guidelines.

- |          |   |    |    |
|----------|---|----|----|
| <b>2</b> | Are state personnel familiar with the jurisdictional authority and Memorandum of Understanding between NTSB and PHMSA? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6 ? Appendix D) Previous Question E.2<br>Yes = .5 No = 0 | .5 | .5 |
|----------|---|----|----|

### SLR Notes:

Rick Moses received program manager orientation training in 2010. Rick is well aware of the authorities and understandings outlined in the MOU between the NTSB and PHMSA.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | Did the state keep adequate records of incident notifications received? Previous Question E.3<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

### SLR Notes:

The FLPSC program manager maintains an electronic log of all incidents (including those that do not meet federal thresholds for reporting) reported to the FLPSC. Incident investigation files are kept by the FLPSC. The three incidents reported were well documented and an investigation report was published with all supporting documentation.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | If an onsite investigation of an incident was not made, did the state obtain sufficient information by other means to determine the facts and support the decision not to go on-site? Previous Question E.4<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

### SLR Notes:

All incidents reported that occurred in 2009 were investigated at the incident scene.

- |          |   |                                      |  |
|----------|---|--------------------------------------|--|
| <b>5</b> | Were investigations thorough and conclusions and recommendations documented in an acceptable manner? Previous Question E.5, comprehensive question worth 2 points total<br>Yes = 2 No = 0 Needs Improvement = 1 | 2                                    | 2  |
| a.       | Observations and Document Review  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b.       | Contributing Factors  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| c.       | Recommendations to prevent recurrences where appropriate  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

### SLR Notes:

No issues were found.

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Did the state initiate enforcement action for violations found during any incident investigation(s)? Previous Question E.6 Variation<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

### SLR Notes:

Yes, a probable violation was found in one of the incidents. The FLPSC followed its non compliance notification procedures.

- |          |  |    |     |
|----------|--|----|-----|
| <b>7</b> | Did the state assist region office by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate annual report data from operators concerning incidents/accidents and investigate discrepancies) (Chapter 6) Previous Question E.7/E.8<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

### SLR Notes:

No issues were found.

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

### SLR Notes:

The FLPSC generally complied with the requirements of Part D of this evaluation.

---

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



## PART E - Damage Prevention Initiatives

Points(MAX) Score

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Has the state reviewed directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies? Previous Question B.11<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

### SLR Notes:

The FLPSC has addressed this issue with operators in the past while reviewing operation and maintenance procedures required in 192.605. The FLPSC also reviews directional drilling/boring procedures when conducting construction inspections that involve trenchless excavation. The FLPSC provides it operators with PHMSA Advisory Bulletins as they are published.

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | Did the state inspector check to assure the pipeline operator is following its written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? New 2008<br>Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

### SLR Notes:

The FLPSC reviews the operators procedures and records pertaining to requirements for locating pipeline facilities resulting from excavation notifications. This requirement is reviewed when the FLPSC covers 192.614 requirements during standard inspections.

- |          |   |   |   |
|----------|---|---|---|
| <b>3</b> | Did the state encourage and promote the adoption of the Common Ground Alliance Best Practices document to its regulated companies as a means of reducing damages to all underground facilities? Previous Question A.7<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

### SLR Notes:

The FLPSC works closely with the one call system in Florida and has encouraged them to adopt best practices for One Call Centers. The FLPSC has discussed with operators the need to adopt practices in the CGA document that are applicable to facility owners.

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests? New 2008<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

### SLR Notes:

The FLPSC includes a trend chart of this data in its Annual Pipeline Safety Report provided to the Commissioners each year.

- |          |  |   |   |
|----------|--|---|---|
| <b>5</b> | Did the state review operators' records of accidents and failures due to excavation damage to ensure causes of failure are addressed to minimize the possibility of recurrence as required by 192.617?<br>Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

### SLR Notes:

The FLPSC covers 192.617 requirements during its standard inspections of operators. The FLPSC reviews operator's leak repair records while conducting standard inspections. The FLPSC attempts to identify any excavation damage trends that justify the revision of operators procedures.

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>6</b> | Part E: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

### SLR Notes:

The FLPSC has generally complied with the requirements in Part E of this evaluation.

Total points scored for this section: 9  
Total possible points for this section: 9

## PART F - Field Inspection

Points(MAX) Score

- 1 Operator, Inspector, Location, Date and PHMSA Representative Info Only Info Only  
Info Only = No Points

Name of Operator Inspected:

City of Madison, FL

Name of State Inspector(s) Observed:

Blessen Matthew and Patrick Nguyen

Location of Inspection:

Madison, FL

Date of Inspection:

October 5 - 6, 2011

Name of PHMSA Representative:

Don Martin

### SLR Notes:

The FLPSC conducted a standard inspection ( including Operator Qualification ) of the municipal operator City of Madison, FL. Mike Smith, Gas Department Supervisor, represented the operator. The inspection began on Tuesday, October 4, 2011. On October 5th and 6th the FLPSC inspectors observed test readings in the field. The FLPSC inspectors were observed on October 5th and 6th.

- 2 Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? New 2008 1 1  
Yes = 1 No = 0

### SLR Notes:

Notification was provided three weeks prior to the start of the inspection.

- 3 Did the inspector use an acceptable inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) Previous Question F.2 2 2  
Yes = 2 No = 0

### SLR Notes:

Yes. The inspectors used the FLPSC's standard inspection and operator qualification field inspection form. Both forms were acceptable.

- 4 Did the inspector thoroughly document results of the inspection? Previous Question F.3 2 2  
Yes = 2 No = 0

### SLR Notes:

All line items in the forms were completed as the inspection progressed.

- 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.) New 2008 1 1  
Yes = 1 No = 0

### SLR Notes:

Yes. The inspectors checked the equipment and verified calibration requirements were completed for the equipment.

- 6 What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc) New 2008 Info Only Info Only  
Info Only = No Points

### SLR Notes:

During the observation, the inspectors observed valve inspections, cathodic protection test point and rectifier test readings, leak detection at cased road crossings, condition of right of way and sign markers.

- 7 Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) New 2008, comprehensive question worth 2 points total 2 2  
Yes = 2 No = 0 Needs Improvement = 1
- a. Procedures ☐
- b. Records ☒
- c. Field Activities/Facilities ☒

d. Other (Please Comment)

☐

SLR Notes:

Operation and maintenance procedure reviews was not within the scope of this inspection. Records and field readings were covered.

- |          |   |   |   |
|----------|---|---|---|
| <b>8</b> | Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Liaison will document reasons if unacceptable) Previous Question F.8<br>Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

Patrick Nguyen has very good knowledge of pipeline safety regulations. He was assisted by Blessen Matthew who has recently entered the program. Blessen has not taken any TnQ courses at this point in time.

- |          |  |   |   |
|----------|--|---|---|
| <b>9</b> | 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) Previous Question F.10<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

The inspection was scheduled for completion following the time of the observation. Results during the observation were covered.

- |           |  |   |   |
|-----------|--|---|---|
| <b>10</b> | During the exit interview, did the inspector identify probable violations found during the inspections? Previous Question F.11<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|

SLR Notes:

One probable violation was discussed regarding an issue with operator qualification requirements.

- |           |   |           |           |
|-----------|---|-----------|-----------|
| <b>11</b> | What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)<br>Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

SLR Notes:

The inspectors observed test readings of cathodic protection test points and rectifiers, inspection and operation of critical valves, lead detection at cased road crossings and the condition of signs and right of way. The inspectors were thorough in their observations and asked good questions of the operator's personnel. Operator qualifications requirements were verified for the covered tasks being performed during the field portion of the inspection.

- |           |  |           |           |
|-----------|--|-----------|-----------|
| <b>12</b> | Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)<br>Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

SLR Notes:

There were no best practices observed to share with other states.

- |           |  |                                     |           |
|-----------|--|-------------------------------------|-----------|
| <b>13</b> | Field Observation Areas Observed (check all that apply)<br>Info Only = No Points | Info Only                           | Info Only |
|           | a. Abandonment   | <input type="checkbox"/>            |           |
|           | b. Abnormal Operations   | <input checked="" type="checkbox"/> |           |
|           | c. Break-Out Tanks   | <input type="checkbox"/>            |           |
|           | d. Compressor or Pump Stations   | <input type="checkbox"/>            |           |
|           | e. Change in Class Location  | <input type="checkbox"/>            |           |
|           | f. Casings   | <input checked="" type="checkbox"/> |           |
|           | g. Cathodic Protection   | <input checked="" type="checkbox"/> |           |
|           | h. Cast-iron Replacement   | <input type="checkbox"/>            |           |
|           | i. Damage Prevention   | <input checked="" type="checkbox"/> |           |
|           | j. Deactivation  | <input type="checkbox"/>            |           |
|           | k. Emergency Procedures  | <input 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 type="checkbox"/>            |           |

r.	Moving Pipe	<input type="checkbox"/>
s.	New Construction	<input type="checkbox"/>
t.	Navigable Waterway Crossings	<input type="checkbox"/>
u.	Odorization	<input type="checkbox"/>
v.	Overpressure Safety Devices	<input type="checkbox"/>
w.	Plastic Pipe Installation	<input 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 checked="" type="checkbox"/>
H.	Compliance Follow-up	<input type="checkbox"/>
I.	Atmospheric Corrosion	<input checked="" type="checkbox"/>
J.	Other	<input type="checkbox"/>

**SLR Notes:**

See items above that were observed during the evaluation. Other areas were inspected but were performed prior to the evaluation observation.

**14** Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

**SLR Notes:**

The FLPSC generally complied with the requirements of Part F of this evaluation.

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





## PART G - PHMSA Initiatives - Strategic Plan

Points(MAX) Score

### Risk base Inspections - Targeting High Risk Areas

- 1** Does state have process to identify high risk inspection units? 1.5 1.5  
Yes = 1.5 No = 0

Risk Factors (criteria) to consider may include:

Miles of HCA's, Geographic area, Population Density

Length of time since last inspection

History of Individual Operator units (leakage, incident and compliance history, etc.)

Threats - (Excavation Damage, Corrosion, Natural Forces, Other Outside Forces, Material or Welds, Equipment, Operations, Other)

#### SLR Notes:

The FLPSC identifies key threats on a statewide basis using data gathered from various sources. The FLPSC associates the key threats with gas systems for which the threats may be applicable. The FLPSC also considers the factors above when considering the scope of inspections it schedules for operators' inspection units along with the results of prior inspections.

- 2** Are inspection units broken down appropriately? (see definitions in Guidelines) .5 0.5  
Yes = .5 No = 0

#### SLR Notes:

The inspection units generally comply with guidance that is provided.

- 3** Consideration of operators DIMP Plan? (if available and pending rulemaking) Info Only Info Only  
Info Only = No Points

#### SLR Notes:

The FLPSC is verifying that operators have the plans at this time. The FLPSC plans to begin reviewing the plans in January, 2012.

- 4** Does state inspection process target high risk areas? .5 0.5  
Yes = .5 No = 0

#### SLR Notes:

The FLPSC has viewed cast iron main as a key risk factor in the gas distribution pipeline portion of its regulatory oversight. The FLPSC has mandated that operators have cast iron main replacement programs. The FLPSC monitors the mileage of cast iron mains remaining in Florida by operator each year. Steel pipeline corrosion has been identified as a key threat by the FLPSC. The FLPSC requires operators to account for IR drop in their cathodic protection tests by utilizing current interruption when test points are read.

### Use of Data to Help Drive Program Priority and Inspections

- 5** Does state use data to analyze effectiveness of damage prevention efforts in the state? (DIRT or other data, etc) .5 0.5  
Yes = .5 No = 0

#### SLR Notes:

The FLPSC receives data from the Florida one call system operator and from the pipeline operators under its jurisdiction. The FLPSC includes third party damage data in its annual report to the Commissioners.

- 6** Has state reviewed data on Operator Annual reports for accuracy? .5 0.5  
Yes = .5 No = 0

#### SLR Notes:

The FLPSC requires that operators provide it with a copy of its Annual Reports submission to PHMSA each year. The FLPSC reviews the information for accuracy and comparison to the previous year report. Operators are notified of any inconsistencies found during the reviews.

- 7** Has state analyzed annual report data for trends and operator issues? .5 0.5  
Yes = .5 No = 0

#### SLR Notes:

The FLPSC reviews trends on leak repair information and lost and unaccounted for gas percentages. The FLPSC monitors the trend of cast iron and bare steel mains mileage remaining in each operator's system and the total within the state of Florida.

- 8** Has state reviewed data on Incident/Accident reports for accuracy? .5 0.5  
Yes = .5 No = 0

SLR Notes:

The FLPSC reviews data on incident reports to ensure that the reports are complete and accurate and that the operator's stated cause of the gas release is reasonable and is consistent with the FLPSC's investigation.

- |                                |   |    |     |
|--------------------------------|---|----|-----|
| <b>9</b>                       | Does state do evaluation of effectiveness of program based on data? (i.e. performance measures, trends, etc.) | .5 | 0.5 |
| <small>Yes = .5 No = 0</small> |   |    |     |

SLR Notes:

The FLPSC publishes a document titled Annual Natural Gas Pipeline Safety Report addressed to the Commissioners. The document includes several charts trending different aspects of pipeline safety. As an example of data utilized, one of the key measures outlined in the latest report indicates that gas leaks have trended downward since 1995 while the mileage of gas mains has more than doubled. There are other performance measures outlined in the report that uses data for performance assessment.

- |                                |  |    |     |
|--------------------------------|--|----|-----|
| <b>10</b>                      | Did the State input all operator qualification inspection results into web based database provided by PHMSA in a timely manner upon completion of OQ inspections? Previous Question B.15 | .5 | 0.5 |
| <small>Yes = .5 No = 0</small> |  |    |     |

SLR Notes:

Upon a review of the FLPSC state page on the OQ database, OQ inspection protocol forms have been uploaded to the OQ database. The FLPSC will begin uploading Protocol 9 inspection information.

- |                                |  |    |     |
|--------------------------------|--|----|-----|
| <b>11</b>                      | Did the State submit their replies into the Integrity Management Database (IMDB) in response to the Operators notifications for their integrity management program? Previous Question B.16 | .5 | 0.5 |
| <small>Yes = .5 No = 0</small> |  |    |     |

SLR Notes:

Upon a review of the database, there were no notifications in 2010 that had not received replies.

- |                                |   |    |     |
|--------------------------------|---|----|-----|
| <b>12</b>                      | Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17 | .5 | 0.5 |
| <small>Yes = .5 No = 0</small> |   |    |     |

SLR Notes:

Upon a review of the Gas IMP Database, the FLPSC has uploaded the Protocol forms for the IMP inspections that have been completed.

- |                                |   |    |     |
|--------------------------------|---|----|-----|
| <b>13</b>                      | Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns? Previous Question B.18 | .5 | 0.5 |
| <small>Yes = .5 No = 0</small> |   |    |     |

SLR Notes:

The FLPSC covered the issue of plastic pipe failure data with its operators when the concern was brought to a national level some time ago. Operators are encouraged to report into the Plastic Pipe Database.

- |                                |  |    |     |
|--------------------------------|--|----|-----|
| <b>14</b>                      | Has state confirmed transmission operators have submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submission? | .5 | 0.5 |
| <small>Yes = .5 No = 0</small> |  |    |     |

SLR Notes:

Yes. The FLPSC has reviewed the NPMS and has not identified any pipelines that appear to be omitted.

## Accident/Incident Investigation Learning and Sharing Lessons Learned

- |                                |  |    |     |
|--------------------------------|--|----|-----|
| <b>15</b>                      | Has state shared lessons learned from incidents/accidents? (i.e. NAPSRS meetings and communications) | .5 | 0.5 |
| <small>Yes = .5 No = 0</small> |  |    |     |

SLR Notes:

The FLPSC presented an update of its program at the NAPSRS Southern Region Meeting held in August, 2010. The FLPSC included a topic on the incidents that occurred in Florida since the previous NAPSRS Southern Region meeting.

- |                                |   |    |    |
|--------------------------------|---|----|----|
| <b>16</b>                      | Does the State support data gathering efforts concerning accidents? (Frequency/Consequence/etc) | .5 | NA |
| <small>Yes = .5 No = 0</small> |   |    |    |

SLR Notes:

There were no data gathering efforts identified for accidents during 2010.

- |                                      |  |           |           |
|--------------------------------------|--|-----------|-----------|
| <b>17</b>                            | Does state have incident/accident criteria for conducting root cause analysis? | Info Only | Info Only |
| <small>Info Only = No Points</small> |  |           |           |

SLR Notes:

Not at this time.

---

**18** Does state conduct root cause analysis on incidents/accidents in state?

Info Only Info Only

Info Only = No Points

SLR Notes:

One incident investigated by Karl Chen did incorporate some of the root cause analytical techniques into the investigation.

---

**19** Has state participated on root cause analysis training? (can also be on wait list)

.5

0.5

Yes = .5 No = 0

SLR Notes:

One inspector has completed the training.

---

## Transparency - Communication with Stakeholders

**20** Other than pipeline safety seminar does State communicate with stakeholders? (Communicate program data, pub awareness, etc.)

.5

0.5

Yes = .5 No = 0

SLR Notes:

The FLPSC participates in gas industry association functions and conferences. The FLPSC has a section in its website that allows the public to view summary enforcement information and communicate with the Bureau of Safety on pipeline safety concerns.

---

**21** Does state share enforcement data with public? (Website, newsletters, docket access, etc.)

.5

0.5

Yes = .5 No = 0

SLR Notes:

Any enforcement action that results in a docketed case brought before the commission can be accessed by the public through the FLPSC's website and docket system.

---

**22** Part G: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

The FLPSC has generally complied with the requirements in Part G of this evaluation.

---

Total points scored for this section: 9.5  
Total possible points for this section: 9.5



## PART H - Miscellaneous

Points(MAX) Score

- |          |   |    |     |
|----------|---|----|-----|
| <b>1</b> | What were the major accomplishments for the year being evaluated? (Describe the accomplishments, NAPSR Activities and Participation, etc.)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

### SLR Notes:

The FLPSC strongly encouraged the replacement of cast iron and bare steel distribution mains and services. Several miles of these pipelines were replaced during 2010.

- |          |  |    |     |
|----------|--|----|-----|
| <b>2</b> | What legislative or program initiatives are taking place/planned in the state, past, present, and future? (Describe initiatives (i.e. damage prevention, jurisdiction/authority, compliance/administrative, etc.)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

### SLR Notes:

The FLPSC has notified operators to submit plans for the replacement of cast iron and bare steel pipelines by November, 2011. The FLPSC will be reviewing those plans and follow up on their implementation.

- |          |  |    |     |
|----------|--|----|-----|
| <b>3</b> | Any Risk Reduction Accomplishments/Projects? (i.e. Cast iron replacement projects, bare steel, third-party damage reductions, etc.)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

### SLR Notes:

See Question H.2. The FLPSC is placing a high priority on the replacement of cast iron and bare steel pipelines.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Did the state participate in/respond to surveys or information requests from NAPSR or PHMSA?<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

### SLR Notes:

The FLPSC completed all surveys that were requested by PHMSA and NAPSR.

- |          |   |    |     |
|----------|---|----|-----|
| <b>5</b> | Sharing Best Practices with Other States - (General Program)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

### SLR Notes:

The FLPSC has shared information with other states in NAPSR forums such as the Regional and National meetings.

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>6</b> | Part H: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

### SLR Notes:

The FLPSC has generally complied with the requirements of Part H of this evaluation.

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

## PART I - Program Initiatives

Points(MAX) Score

### Drug and Alcohol Testing (49 CFR Part 199)

- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | Has the state verified that operators have drug and alcohol testing programs?<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

#### SLR Notes:

The FLPSC covers drug and alcohol testing programs when conducting annual standard inspections. The FLPSC conducted 28 drug and alcohol inspections during 2010.

- |          |  |    |     |
|----------|--|----|-----|
| <b>2</b> | Is the state verifying that operators are conducting the drug and alcohol tests required by the operators program (random, post-incident, etc.)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

#### SLR Notes:

The FLPSC reviews operators records to verify that operators are conducting the required testing as required in Part 199 and the operators' drug and alcohol plans. The FLPSC verifies that the operator has achieved the minimum random testing rate.

- |          |   |    |     |
|----------|---|----|-----|
| <b>3</b> | Is the state verifying that any positive tests are responded to in accordance with the operator's program?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

#### SLR Notes:

The FLPSC verifies that the operator's response to positive tests is consistent with the written requirements in its Drug and Alcohol Testing Plan.

### Qualification of Pipeline Personnel (49 CFR Part 192 Subpart N)

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | Has the state verified that operators have a written qualification program?<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

#### SLR Notes:

Upon a review of the Operator Qualification Inspection Database (OQID), the FLPSC has entered the results of OQ inspections. The FLPSC inspected operator's OQ Plans in 2003 and 2004. The FLPSC had 53 inspection person days inspecting Operator Qualification requirements in 2010.

- |          |  |    |     |
|----------|--|----|-----|
| <b>5</b> | Has the state reviewed operator qualification programs for compliance with PHMSA rules and protocols?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

#### SLR Notes:

The FLPSC utilized the federal OQ inspection protocol form to conduct reviews of operators' OQ programs and compliance with Subpart N.

- |          |  |    |     |
|----------|--|----|-----|
| <b>6</b> | Is the state verifying that persons who perform covered tasks for the operator are qualified in accordance with the operator's program?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

#### SLR Notes:

The FLPSC reviews operators' OQ records during its standard inspections and reviews qualification and requalification records for each employee performing covered tasks.

- |          |  |    |     |
|----------|--|----|-----|
| <b>7</b> | Is the state verifying that persons who perform covered task for the operator are requalified at the intervals specified in the operator's program?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

#### SLR Notes:

Upon reviewing OQ records during standard inspections, the FLPSC checks the records for individuals designated by the operator to be qualified for covered tasks. The FLPSC also verifies that requalification intervals are being complied with each individual designated on each covered task.

### Gas Transmission Pipeline Integrity Management (49 CFR Part 192 Subpart O)

- |          |  |   |   |
|----------|--|---|---|
| <b>8</b> | Has the state verified that all operators with transmission pipelines have either adopted an integrity management program (IMP), or have properly determined that one is not required?<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

#### SLR Notes:

The Gas IMP database indicates that the FLPSC has completed its IMP inspections.

- |          |  |    |     |
|----------|--|----|-----|
| <b>9</b> | Has the state verified that in determining whether a plan is required, the operator correctly calculated the potential impact radii and properly applied the definition of a high consequence area?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

#### SLR Notes:

The FLPSC uses and completes all information in the protocol forms while conducting its inspections of Integrity Management Plans. The protocol form covers this requirement.

- |           |   |    |     |
|-----------|---|----|-----|
| <b>10</b> | Has the state reviewed operator IMPs for compliance with Subpart O? (In accordance with State Inspection plan)<br>Yes = .5 No = 0 | .5 | 0.5 |
|-----------|---|----|-----|

**SLR Notes:**

The FLPSC uses and completes all information in the protocol forms while conducting its inspections of Integrity Management Plans. The protocol form covers the requirements of Subpart O.

- |           |  |    |     |
|-----------|--|----|-----|
| <b>11</b> | Is the state monitoring operator progress on the inspections, tests and remedial actions required by the operator's IMP, including that they are being done in the manner and schedule called for in its IMP?<br>Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

**SLR Notes:**

The FLPSC uses and completes all information in the protocol forms while conducting its inspections of Integrity Management Plans. The protocol form covers this requirement.

- |           |  |    |     |
|-----------|--|----|-----|
| <b>12</b> | Is the state verifying that operators are periodically examining their transmission line routes for the appearance of new HCAs?<br>Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

**SLR Notes:**

The FLPSC has reviewed gas transmission operator Gas IMP programs to verify that the operators have procedures to identify new HCA's along the pipeline (s). The results are documented in each inspection's protocol forms completed during the inspection.

## Public Awareness (49 CFR Section 192.616)

- |           |  |    |     |
|-----------|--|----|-----|
| <b>13</b> | Has the state verified that each operator has developed a continuing public awareness program? (due date was 6/20/06 for most operators, 6/20/07 for certain very small operators, 6/13/08 for master meters)<br>Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

**SLR Notes:**

The FLPSC participated in the Public Awareness clearinghouse review program. The FLPSC reviewed the results of clearinghouse reviews. The FLPSC provided written notifications to operators of any deficiencies found during the clearinghouse review. The FLPSC followed up with operators until the required revisions were made to their public awareness plans.

- |           |  |    |     |
|-----------|--|----|-----|
| <b>14</b> | Has the state reviewed the content of these programs for compliance with 192.616 (by participating in the Clearinghouse or by other means)?<br>Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

**SLR Notes:**

The FLPSC participated in the Clearinghouse review.

- |           |  |    |     |
|-----------|--|----|-----|
| <b>15</b> | Is the state verifying that operators are conducting the public awareness activities called for in its program?<br>Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

**SLR Notes:**

The FLPSC reviews operators public awareness plan documentation during its standard inspections.

- |           |   |           |           |
|-----------|---|-----------|-----------|
| <b>16</b> | Is the state verifying that operators have evaluated their Public Awareness programs for effectiveness as described in RP1162?<br>Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

**SLR Notes:**

The FLPSC plans to complete these inspections after attending TnQ's training course.

- |           |   |           |           |
|-----------|---|-----------|-----------|
| <b>17</b> | Part I: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

**SLR Notes:**

The FLPSC has generally complied with the requirements in Part I of this evaluation.

Total points scored for this section: 9  
Total possible points for this section: 9