



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

1200 New Jersey Avenue SE  
Washington DC 20590

# 2011 Natural Gas State Program Evaluation

for

FLORIDA PUBLIC SERVICE COMMISSION, Bureau of Safety

## Document Legend

### PART:

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



2011 Natural Gas State Program Evaluation -- CY 2011  
Natural Gas

**State Agency:** Florida

**Agency Status:**

**Date of Visit:** 06/11/2012 - 06/14/2012

**Agency Representative:** Rick Moses, Safety Bureau Chief

**PHMSA Representative:** Don Martin, State Programs Coordinator

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

**Name/Title:** Ronald A. Brise, Chairman

**Agency:** Florida Public Service Commission

**Address:** 2540 Shumard Oak Blvd.

**City/State/Zip:** Tallahassee, Florida 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 2011 (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.

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**Field Inspection (PART G):**

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 G, the PHMSA representative should include a written summary which thoroughly documents the inspection.

**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  
15  
43  
14  
3  
8  
12  
0  
0

10  
15  
43  
14  
3  
8  
12  
0  
0

**TOTALS**

**105                    105**

**State Rating .....**

**100.0**

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## PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1 (A1a)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

**Evaluator Notes:**

Code B (State does not have jurisdictional authority) was entered for LPG, LNG, Gathering and Offshore Facilities. LPG facilities do exist in Florida but the FLPSC does not have jurisdiction which requires that Code B to be entered. However, the FLPSC is not aware of any LNG, Gathering or Offshore facilities that are present in the state. Code A rather than Code B should be entered for these facilities. The FLPSC does not have an interstate agent agreement with PHMSA. Code F should be used for any interstate operator type, interstate transmission and interstate LNG. These entries described above are not considered as inaccuracies.

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | Review of Inspection Days for accuracy - Progress Report Attachment 2 (A1b)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

The FLPSC maintains an Excel spreadsheet during the calendar year to account for inspector's time inspecting each operator. The spreadsheet is populated with time sheet information. Time spent during an inspection is recorded in hours. The inspection person days are computed from this spreadsheet by dividing the hours by 8 to obtain inspection days. The entries on Attachment 2 appear to be correct when reviewing the spreadsheet information.

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|----------|--|---|---|
| <b>3</b> | Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3 (A1c)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

The listing of operators and inspection units maintained by the FLPSC verified the accuracy of Attachment 3. No issues found.

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|----------|--|---|---|
| <b>4</b> | Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4 (A1d)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

One incident was described on Attachment 4. Upon a review of PHMSA's ODES database there was no record of a written incident report for the incident. The incident was telephonically reported but was later rescinded by the operator when it was determined that damages would not exceed \$50,000. Since the incident was telephonically reported the FLPSC decided to include it on Attachment 4. If at any time prior to the end of a calendar year an incident is determined not to meet federal reporting thresholds it does not have to be listed on Attachment 4.

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|----------|--|---|---|
| <b>5</b> | Accuracy verification of Compliance Activities - Progress Report Attachment 5 (A1e)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

The information on Attachment 5 was verified from the FLPSC's spreadsheet that records probable violations found during inspections.

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| <b>6</b> | Were pipeline program files well-organized and accessible? - Progress Report Attachment 6 (A1f, A4)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

**Evaluator Notes:**

The pipeline safety hard copy files were well organized. All requested files were easy to access.

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|----------|--|---|---|
| <b>7</b> | Was employee listing and completed training accurate and complete? - Progress Report Attachment 7 (A1g)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

All employees were accurate. The training information was downloaded by PHMSA from the Training and Qualification database.

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| <b>8</b> | Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8 (A1h)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

No issues were found with the status of amendment adoptions. The FLPSC will need to adopt at least one Part 192 amendment during 2012 to avoid the loss of Progress Report review points for the 2012 Progress Report.

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|----------|---|---|---|
| <b>9</b> | List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10 (H1-3)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

The FLPSC has placed a priority on the replacement of all cast iron and bare steel pipeline in the state. It is recommended that the FLPSC provide a narrative describing how it performed in comparison to its Inspection Plan established for the year.

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|-----------|--|-----------|-----------|
| <b>10</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

Evaluator Notes:

Question A.1 - On Attachment 1 of the FLPSC's 2011 Progress Report, Code B (State does not have jurisdictional authority) was entered for LPG, LNG, Gathering and Offshore Facilities. However, the FLPSC is not aware of any LNG, Gathering or Offshore facilities that are present in the state. Code A should be entered for these facilities. The FLPSC does not have an interstate agent agreement with PHMSA. Code F should be used for any interstate operator type, interstate transmission and interstate LNG. These entries described above are not considered as inaccuracies.

Question A.8 - The FLPSC will need to adopt at least one Part 192 amendment during 2012 to avoid the loss of Progress Report review points for the 2012 Progress Report.

Question A.9 - It is recommended that the FLPSC provide a narrative describing how it performed in comparison to its Inspection Plan established for the year.

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



## PART B - Program Inspection Procedures

Points(MAX) Score

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Standard Inspections (B1a)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

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

- |          |   |   |   |
|----------|---|---|---|
| <b>2</b> | IMP Inspections (including DIMP) (B1b)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Gas Transmission and Distribution Integrity Management inspections are covered in the FLPSC's procedures. They are scheduled when risk evaluations determine it to be a required focus area.

- |          |   |   |   |
|----------|---|---|---|
| <b>3</b> | OQ Inspections (B1c)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

The FLPSC procedures require each operator's systems to be inspected annually not to exceed fifteen months. Subpart N, Operator Qualifications, can be scheduled as a focus area during a Standard Inspection.

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|----------|--|---|---|
| <b>4</b> | Damage Prevention Inspections (B1d)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator 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. Part 192.614, Damage Prevention, can be a focus area of the Standard Inspections.

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| <b>5</b> | On-Site Operator Training (B1e)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

On site operator training is scheduled on an as needed basis.

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Construction Inspections (B1f)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Operators are required to notify the FLPSC of construction projects prior to their commencement. The FLPSC schedules these inspections based upon its notifications.

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|----------|--|---|---|
| <b>7</b> | Incident/Accident Investigations (B1g)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

The FLPSC procedures cover incident investigations and how they are conducted. No issues found with the procedures.

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|----------|---|---|---|
| <b>8</b> | Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? (B2a-d, G1,2,4)<br>Yes = 6 No = 0 Needs Improvement = 1-5 | 6 | 6 |
|----------|---|---|---|

- |  |                                      |                          |   |
|--|--------------------------------------|--------------------------|---|
| a. Length of time since last inspection  | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. Type of activity being undertaken by operators (i.e. construction)  | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

- d. Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc) Yes ☒ 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:

The FLPSC identifies key threats on a statewide basis using data gathered from various sources. The FLPSC assigns key threats to each inspection unit for which the threats are applicable. The FLPSC also considers all the factors above along with results of prior inspections when determining the scope and timing of inspections.

**9** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

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

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



## 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 (A12) 5 5  
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):  
1029.11

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  
1029.11 / 1184.33 = 0.87

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

### Evaluator Notes:

The FLPSC experienced 1029 inspection person days with 5.38 person years of staffing. This resulted in a ratio of 0.87 which is greater than the minimum ratio of 0.38.

- 2 Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines for requirements) Chapter 4.4 (A8-A11, G19) 5 5  
Yes = 5 No = 0 Needs Improvement = 1-4

- |    |  |                                      |                                     |   |
|----|--|--------------------------------------|-------------------------------------|---|
| a. | Completion of Required OQ Training before conducting inspection as lead?                                     | Yes <input checked="" type="radio"/> | No <input type="radio"/>            | Needs Improvement <input type="radio"/> |
| b. | Completion of Required DIMP*/IMP Training before conducting inspection as lead? *Effective Evaluation CY2013 | Yes <input type="radio"/>            | No <input checked="" 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 type="radio"/>            | No <input checked="" type="radio"/> | Needs Improvement <input type="radio"/> |

### Evaluator Notes:

All of the inspectors have completed the mandatory courses for natural gas inspections except for Blesson Mathew who recently joined the FLPSC's pipeline safety staff. Rick Moses, program manager, has completed one of the required courses. Mr. Moses became the program manager in 2011. He will need to complete the training by the end of 2016. No inspectors have completed the five required courses for Gas Transmission Integrity Management courses. There were no Gas Transmission IMP inspections conducted during 2011.

- 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 (A5) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

Rick Moses has been the program manager for less than two years. Mr. Moses has learned aspects of the pipeline safety program very quickly. He is ahead of schedule in successfully completing the required Training and Qualification courses. No issues identified with this requirement.

- 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 (A6-7) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

The FLPSC responded in 27 days. All deficiencies discussed in the letter have been addressed.

- 5 Did State hold PHMSA TQ Seminar in Past 3 Years? Chapter 8.5 (A3) 2 2  
Yes = 2 No = 0

### Evaluator Notes:

The FLPSC held its last pipeline safety seminar in February, 2012.

- 6 Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1 (B3) 5 5

Yes = 5 No = 0 Needs Improvement = 1-4

Evaluator Notes:

All the operators and inspection units were inspected during the calendar year of 2011 which is consistent with the FLPSC's written procedures.

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- |   |   |   |   |
|---|---|---|---|
| 7 | Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1 (B4-5) | 2 | 2 |
|   | Yes = 2 No = 0 Needs Improvement = 1  |   |   |

Evaluator Notes:

The FLPSC uses inspection forms that were developed by the FLPSC. The forms are as follows:

GS-1 New Construction Requirements Checklist  
GS-3 Inspection and Maintenance Requirements Checklist  
GS-5 Pressure Regulating Station Data Checklist  
GS-6 Odorization Checklist  
GS-13 Annual Natural Gas Pipeline Safety Summary  
GS-9 Construction Inspection Checklist - Visual  
GS-10 Gas Incident/Accident Inspection Checklist  
GS-11 Notification of Commission Rule Violation  
GS-Drug /Alcohol Programs  
Public Awareness Plan  
PHMSA DIMP 192.1005-192.1001 Distribution Operators  
PHMSA DIMP 192.1015 Master Meters

Upon a review of the forms used by the FPSC, it appears that the forms cover all of the federal pipeline safety requirements. The forms also include state requirements that are more stringent.

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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 (B7) | 1 | 1 |
|   | Yes = 1 No = 0   |   |   |

Evaluator 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 covers this issue on Page 12 of its GS-03 inspection form.

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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 (B8) | 1 | 1 |
|   | Yes = 1 No = 0  |   |   |

Evaluator 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. This issue is covered in the continuing surveillance section on Page 3 of the GS-03 Inspection Form.

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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 (B9) | 1 | 1 |
|    | Yes = 1 No = 0   |   |   |

Evaluator 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. This issue is covered on Page 4 of the GS-03 Inspection Form.



- 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 (B10,E5) 1 1  
Yes = 1 No = 0

Evaluator Notes:

The FLPSC reviews each leak response records. It monitors 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 and completes the GS-03 inspection form.

- 12 Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues? Data Initiative (G6-9,G16) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Operators are required to submit a copy of its Annual Report to the FLPSC each year. Operators are notified of any inconsistencies found during the FLPSC's review.

- 13 Did state input all applicable OQ, IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1 (G10-12) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Five OQ Program and fifteen Field Inspections conducted in 2011 were entered into the OQ database during 2011. No issues identified.

- 14 Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission? (G14) 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The FLPSC has reviewed the NPMS and has not identified any gas transmission pipelines under its jurisdiction that appear to be omitted.

- 15 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 (I1-3) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

The FLPSC reviews drug and alcohol test records during its Standard Inspections. The FLPSC completes a Drug and Alcohol form during its review of the operator's records.

- 16 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 (I4-7) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

The FLPSC does not inspect an operator's OQ Plan each year but does conduct a field inspection of operators' programs by verifying records and observing employee's performing covered tasks. The OQ field inspection form is completed for the field inspection.

- 17 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). 49 CFR 192 Subpart 0 (I8-12) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Upon a review of the Gas Integrity Management Database seventeen operators have completed IMP inspections uploaded to the database. Attachment 1 and 3 indicate that there are seventeen gas transmission operators.

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| <b>18</b> | Is state verifying operator's gas distribution integrity management Programs (DIMP)?<br>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). 49 CFR 192 Subpart P<br>Info Only = No Points | Info OnlyInfo Only |
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Evaluator Notes:

The FLPSC has begun its initial review of operators' Distribution Integrity Management Programs.

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| <b>19</b> | Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. 49 CFR 192.616 (I13-16)<br>Yes = 2 No = 0 Needs Improvement = 1 | 22 |
|-----------|---|----|

Evaluator 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. The FLPSC has begun a review of operators' effectiveness analyses of their Public Awareness Plans.

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| <b>20</b> | Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public). (G20-21)<br>Yes = 1 No = 0 Needs Improvement = .5 | 11 |
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Evaluator Notes:

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.

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| <b>21</b> | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 (B6)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1NA |
|-----------|--|-----|

Evaluator Notes:

There were no Safety Related Condition Reports filed by an operator during 2011.

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| <b>22</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? (G13)<br>Yes = 1 No = 0 Needs Improvement = .5 | 11 |
|-----------|---|----|

Evaluator Notes:

The FLPSC covers the issue of plastic pipe failure data with its operators during its Standard Inspections. Operators have been encouraged to report into the Plastic Pipe Database.

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| <b>23</b> | Did the state participate in/respond to surveys or information requests from NAPS or PHMSA? (H4)<br>Yes = 1 No = 0 Needs Improvement = .5 | 11 |
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Evaluator Notes:

There were no surveys or requests identified where the FLPSC did not respond.

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| <b>24</b> | General Comments:<br>Info Only = No Points | Info OnlyInfo Only |
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Evaluator Notes:

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

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Total points scored for this section: 43  
Total possible points for this section: 43

## PART D - Compliance Activities

Points(MAX) Score

- 1 Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1 (B12-14, B16, B1h) 4 4  
Yes = 4 No = 0 Needs Improvement = 1-3
- a. Procedures to notify an operator (company officer) when a noncompliance is identified Yes ☒ No ☐ Needs Improvement ☐
- b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns Yes ☒ No ☐ Needs Improvement ☐

### Evaluator Notes:

The FLPSC procedures require 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. Notification of probable violations are addressed to officers of private companies. 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.

- 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? Chapter 5.1 (B11,B18,B19) 4 4  
Yes = 4 No = 0 Needs Improvement = 1-3
- a. Were compliance actions sent to company officer or manager/board member if municipal/government system? Yes ☒ No ☐ Needs Improvement ☐

### Evaluator Notes:

Upon a review of the FLPSC's 2011 inspection report spreadsheet, the FLPSC documented the responses to its written notifications. Based upon the information in the spreadsheet, Operators responded to the FLPSC's notifications within the timeframe specified in the written notification from the FLPSC.

- 3 Did the state issue compliance actions for all probable violations discovered? (B15) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

Upon a review of randomly selected inspection report files written notification was sent to operators documenting the probable violations found during the inspection. All probable violations noted on inspection forms were addressed.

- 4 Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary. (B17, B20) 2 2  
Yes = 2 No = 0

### Evaluator Notes:

The FLPSC's enforcement procedures provide operators with the opportunity to provide evidence that it was in compliance. Operators are given the option to request hearings with the FLPSC Commissioners to present their arguments.

- 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) (B27) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

Upon a discussion Mr. Mosess explained the FLPSC's process for issuing civil penalties. During 2011, the FLPSC developed a process to identify repeat violations by operators. Repeat violations will be one of the criteria in the decision process to issue civil penalties.

- 6 Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations? (new question) Info Only Info Only  
Info Only = No Points

### Evaluator Notes:

The FLPSC has issued civil penalties in past years. There have not been any issues within the last two years.

7 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

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

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Total points scored for this section: 14

Total possible points for this section: 14



## PART E - Incident Investigations

Points(MAX) Score

- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | 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 (A2,D1-3)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2   | 2                                       |
| a.       | Acknowledgement of MOU between NTSB and PHMSA (Appendix D)  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b.       | Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E)  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

### Evaluator Notes:

Mr. Moses explained his understanding of the MOU between the NTSB and PHMSA and the investigation cooperation described in Appendix E of the Guidelines. The FLPSC requires operators to telephonically notify it when an incident occurs. Operators are provided with a telephone number to contact during and after normal work hours. The FLPSC program manager is also very active in the emergency management process for the state. One incident was reported on Attachment 4 of the 2011 Progress Report. The operator reported the incident due to the expectation that the damage cost would exceed \$50,000. Subsequently the operator determined that the damages would not exceed \$50,000. The operator provided written notification that it was rescinding the report of the incident.

- |          |   |   |    |
|----------|---|---|----|
| <b>2</b> | 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 (D4)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

### Evaluator Notes:

The FLPSC did not make an on site investigation of the incident due to the operator determination that the \$50,000 damage threshold would not be exceeded. For Calendar Year 2011 this question is not applicable.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? (D5)<br>Yes = 3 No = 0 Needs Improvement = 1-2 | 3   | NA                                      |
| a.       | Observations and document review   | Yes <input type="radio"/> No <input checked="" type="radio"/> | Needs Improvement <input type="radio"/> |
| b.       | Contributing Factors   | Yes <input type="radio"/> No <input checked="" type="radio"/> | Needs Improvement <input type="radio"/> |
| c.       | Recommendations to prevent recurrences when appropriate  | Yes <input type="radio"/> No <input checked="" type="radio"/> | Needs Improvement <input type="radio"/> |

### Evaluator Notes:

The operator determined that the \$50,000 damage threshold would not be exceeded. The FLPSC was not required to enter this incident into Attachment 4 since it did not meet federal reporting thresholds. For Calendar Year 2011 this question is not applicable.

- |          |  |   |    |
|----------|--|---|----|
| <b>4</b> | Did the state initiate compliance action for violations found during any incident/accident investigation? (D6)<br>Yes = 1 No = 0 | 1 | NA |
|----------|--|---|----|

### Evaluator Notes:

There were no reportable incidents in 2011. This question is not applicable for calendar year 2011.

- |          |  |   |    |
|----------|--|---|----|
| <b>5</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 report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 (D7)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

### Evaluator Notes:

There were no incidents in 2011 that required follow up with the Southern Region. This question is not applicable for 2011.

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Does state share lessons learned from incidents/accidents? (sharing information, such as: at NAPS Region meetings, state seminars, etc) (G15)<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

The FLPSC did share previous incident information with its Southern Region state partners during the NAPSR Southern Region Meeting in August, 2011.

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7 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

Most of the questions in Part E of this evaluation were not applicable since a reportable incident did not occur during the calendar year of 2011. For the questions that were applicable the FLPSC generally complied with the requirements.

---

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



## 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 (E1)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

The FLPSC has addressed this issue with operators in the past when inspecting operation and maintenance procedures required in 192.605. The FLPSC also reviews directional drilling/boring procedures when conducting construction inspections that involve trenchless excavation.

- |   |  |   |   |
|---|--|---|---|
| 2 | 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? (E2)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Part 192.614 provides the regulatory requirements for an operator's damage prevention program. The FLPSC covers 192.614 requirements during its standard inspections. The FLPSC's inspection form is documented with the results of the inspection.

- |   |   |   |   |
|---|---|---|---|
| 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.) (E3)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

The FLPSC has worked with Florida's One Call Center (FOCC) to develop legislative proposals to revise Florida damage prevention laws to align with the 9 elements contained in the PIPES Act. The FOCC is taking the lead on this effort since the FLPSC is prohibited from introducing legislation. CGA Best Practices have been discussed with the FOCC and with operators in various forums such as Pipeline Safety Seminars.

- |   |  |   |   |
|---|--|---|---|
| 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) (E4,G5)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

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

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

Evaluator Notes:

The FLPSC has generally complied with the requirements of Part F of this 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:

Peoples Gas

Name of State Inspector(s) Observed:

Lovedale Peterside

Location of Inspection:

Tampa, FL

Date of Inspection:

10/23-24/2012

Name of PHMSA Representative:

Don Martin

### Evaluator Notes:

The FPSC was conducting a standard inspection of Peoples Gas operations in the Tampa, FL area. Mr. Lovedale Peterside began the inspection on October 17, 2012 and was scheduled to complete the inspection on October 31, 2012. The evaluation was conducted on October 23rd and 24th. Mr. Peterside had completed the records and procedures portion of the inspection. During the evaluation he observed testing of overpressure protection equipment, cathodic protection systems, odorant levels and valve inspections. U.S. DOT Office of Inspector General representatives Susan Crook and Thomas Shanahan were present during the evaluation. Hugh MacFarlane represented Peoples Gas during the inspection.

- 2    Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? (F2)    1    1  
Yes = 1 No = 0

### Evaluator Notes:

The operator was telephonically notified by Mr. Lovedale Peterside two weeks prior to the inspection.

- 3    Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) (F3)    2    2  
Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

The FLPSC inspector utilized the FLPSC's GS-13, GS-5 and GS-6 Forms during the evaluation portion of the inspection.

- 4    Did the inspector thoroughly document results of the inspection? (F4)    2    2  
Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

No issues were identified with the documentation of inspection results.

- 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.) (F5)    1    1  
Yes = 1 No = 0

### Evaluator Notes:

The FLPSC inspector reviewed the testing equipment for the overpressure protection, odorant level and cathodic protection testing. He reviewed calibration records during the records and procedures portion of the inspection.

- 6    Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) (F7)    2    2  
Yes = 2 No = 0 Needs Improvement = 1
- |    |                        |                                     |
|----|------------------------|-------------------------------------|
| a. | Procedures             | <input checked="" type="checkbox"/> |
| b. | Records                | <input checked="" type="checkbox"/> |
| c. | Field Activities       | <input checked="" type="checkbox"/> |
| d. | Other (please comment) | <input type="checkbox"/>            |



Evaluator Notes:

The evaluation site visit did not occur during the procedures and records portion of the inspection. Mr. Peterside provided an explanation of the records and procedures that were reviewed. The records were present in the conference room as he explained what he had reviewed. The evaluation observed a portion of the field activities portion of the inspection. Mr. Peterside explained what he would cover in the remaining portion of the field activities.

- |   |  |   |   |
|---|--|---|---|
| 7 | Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) (F8)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Mr. Peterside has completed all of the required training for a Standard Inspection. He has over twenty years experience in conducting pipeline safety inspections. He exhibited good knowledge of the pipeline safety 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) (F9)<br>Yes = 1 No = 0 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

Mr. Peterside conducted an exit interview for the portion of the inspection conducted on October 23rd and 24th.

- |   |   |   |   |
|---|---|---|---|
| 9 | During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable) (F10)<br>Yes = 1 No = 0 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

Mr Peterside explained that there were no probable violations found during inspection activities on October 23rd and 24th. He explained that he would conduct an overall exit interview at the completion of his inspection on or about October 31.

- |    |  |           |           |
|----|--|-----------|-----------|
| 10 | General Comments: What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) Other.<br>Info Only = No Points | Info Only | Info Only |
|----|--|-----------|-----------|

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

- |    |                                   |                                     |
|----|-----------------------------------|-------------------------------------|
| y. | Purging                           | <input type="checkbox"/>            |
| z. | Prevention of Accidental Ignition | <input type="checkbox"/>            |
| A. | Repairs                           | <input type="checkbox"/>            |
| B. | Signs                             | <input checked="" type="checkbox"/> |
| C. | Tapping                           | <input type="checkbox"/>            |
| D. | Valve Maintenance                 | <input checked="" type="checkbox"/> |
| E. | Vault Maintenance                 | <input type="checkbox"/>            |
| F. | Welding                           | <input type="checkbox"/>            |
| G. | OQ - Operator Qualification       | <input type="checkbox"/>            |
| H. | Compliance Follow-up              | <input type="checkbox"/>            |
| I. | Atmospheric Corrosion             | <input checked="" type="checkbox"/> |
| J. | Other                             | <input type="checkbox"/>            |

Evaluator Notes:

The items checked above were observed during the evaluation that occurred on October 23rd and 24th.

---

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



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

- |          |   |   |    |
|----------|---|---|----|
| <b>1</b> | Did the state use the current federal inspection form(s)? (C1)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

The FLPSC is not an interstate agent.

- |          |  |   |    |
|----------|--|---|----|
| <b>2</b> | Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? (C2)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The FLPSC 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? (C3)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

The FLPSC is not an interstate agent.

- |          |  |   |    |
|----------|--|---|----|
| <b>4</b> | Were probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) (C4)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The FLPSC 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? (C5)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The FLPSC is not an interstate agent.

- |          |   |   |    |
|----------|---|---|----|
| <b>6</b> | Did the state give written notice to PHMSA within 60 days of all probable violations found? (C6)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

The FLPSC is not an interstate agent.

- |          |  |   |    |
|----------|--|---|----|
| <b>7</b> | Did the state initially submit documentation to support compliance action by PHMSA on probable violations? (C7)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The FLPSC is not an interstate agent.

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

Evaluator Notes:

The FLPSC is not an interstate agent.

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

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

- |          |  |   |    |
|----------|--|---|----|
| <b>1</b> | Did the state use the current federal inspection form(s)? (B21)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The FLPSC does not have a 60106 agreement with PHMSA.

- |          |  |   |    |
|----------|--|---|----|
| <b>2</b> | Are results documented demonstrating inspection units were reviewed in accordance with state inspection plan? (B22)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The FLPSC does not have a 60106 agreement with PHMSA.

- |          |   |   |    |
|----------|---|---|----|
| <b>3</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.) (B23)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

The FLPSC does not have a 60106 agreement with PHMSA.

- |          |   |   |    |
|----------|---|---|----|
| <b>4</b> | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (B24)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

The FLPSC does not have a 60106 agreement with PHMSA.

- |          |  |   |    |
|----------|--|---|----|
| <b>5</b> | Did the state give written notice to PHMSA within 60 days of all probable violations found? (B25)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The FLPSC does not have a 60106 agreement with PHMSA.

- |          |  |   |    |
|----------|--|---|----|
| <b>6</b> | Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? (B26)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The FLPSC does not have a 60106 agreement with PHMSA.

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

Evaluator Notes:

The FLPSC does not have a 60106 agreement with PHMSA.

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