

2012 Natural Gas State Program Evaluation

for

INDIANA UTILITY REGULATORY COMMISSION

Document Legend PART:

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



2012 Natural Gas State Program Evaluation -- CY 2012 Natural Gas

State Agency: Indiana		Rating:		
Agency Status:		60105(a): Yes	60106(a): No	Interstate Agent: No
Date of Visit: 06/17/2013	- 06/28/2013			
Agency Representative:	Stephen E. Allen			
PHMSA Representative:	Leonard Steiner			
Commission Chairman t	o whom follow up letter is to be	sent:		
Name/Title:	James D. Atterholt, Chairman			
Agency:	Indiana Utility Regulatory Com	nission		
Address:	101 West Washington Street, Su	ite 1500E		
City/State/Zip:	Indianapolis, Indiana 46204-340	07		

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 2012 (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 then 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.

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 <u>written summary</u> which thoroughly documents the inspection.

Scoring Summary

PARTS	8	Possible Points	Points Scored
А	Progress Report and Program Documentation Review	10	9.5
В	Program Inspection Procedures	15	14
С	Program Performance	45	43
D	Compliance Activities	15	15
Е	Incident Investigations	8	8
F	Damage Prevention	8	8
G	Field Inspections	12	12
Н	Interstate Agent State (If Applicable)	0	0
Ι	60106 Agreement State (If Applicable)	0	0
TOTA	LS	113	109.5
State F	Rating		96.9

PART	A - Progress Report and Program Documentation Review	Points(MAX)	Score
1 Evaluator	Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1 (A1a) Yes = 1 No = 0 Needs Improvement = .5 Notes:	s 1	1
2 Evaluator	Review of Inspection Days for accuracy - Progress Report Attachment 2 (A1b) Yes = 1 No = 0 Needs Improvement = .5 Notes:	1	1
3 Evaluator	Accuracy verification of Operators and Operators Inspection Units in State - Progre Report Attachment 3 (A1c) Yes = 1 No = 0 Needs Improvement = .5 Notes:	ess 1	1
howe	Were all federally reportable incident reports listed and information correct? - Progr Report Attachment 4 (A1d) Yes = 1 No = 0 Needs Improvement = .5 Notes: was one incident in Indiana in CY 2012. The program manager had seen the compl wer, did not enter the informaton on Attachemnt 4 of the Progress Report. All incide red on Attachment 4 of the Progress Report.	eted on the Pipel	
5 Evaluator	Accuracy verification of Compliance Activities - Progress Report Attachment 5 (Al Yes = 1 No = 0 Needs Improvement = .5 Notes:	e) 1	1
6 Evaluator	Were pipeline program files well-organized and accessible? - Progress Report Attachment 6 (A1f, A4) Yes = 2 No = 0 Needs Improvement = 1 Notes:	2	2
7 Evaluator	Was employee listing and completed training accurate and complete? - Progress Rep Attachment 7 (A1g) Yes = 1 No = 0 Needs Improvement = .5 Notes:	port 1	1
8 Evaluator Autor	Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8 (A1h) Yes = 1 No = 0 Needs Improvement = .5 Notes: natic Adoption	1	1

9 List of Planned Performance - Did state describe accomplishments on Progress Report in 1
 1 detail - Progress Report Attachment 10 (H1-3)
 Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

10 General Comments: Info Only = No Points Evaluator Notes: Info OnlyInfo Only

Total points scored for this section: 9.5 Total possible points for this section: 10

1	Standard Inspections (B1a) Yes = 2 No = 0 Needs Improvement = 1	2	1
expla year,	r Notes: ana does not have procedures to conduct all parts of the Standard Inspection. They have a r ained in detail. There are no procedures to determine if the Standard Inspection can be con- by conducting different elements in different years. The forms used for each element of a procedures.	ducted or	ver more that one
2 Evaluator	IMP Inspections (including DIMP) (B1b) Yes = 1 No = 0 Needs Improvement = .5 r Notes:	1	1
3 Evaluator	OQ Inspections (B1c) Yes = 1 No = 0 Needs Improvement = .5 r Notes:	1	1
4 Evaluator	Damage Prevention Inspections (B1d) Yes = 1 No = 0 Needs Improvement = .5 r Notes:	1	1
5 Evaluator	On-Site Operator Training (B1e) Yes = 1 No = 0 Needs Improvement = .5 r Notes:	1	1
6 Evaluato	Construction Inspections (B1f) Yes = 1 No = 0 Needs Improvement = .5 r Notes:	1	1
7 Evaluato	Incident/Accident Investigations (B1g) Yes = 2 No = 0 Needs Improvement = 1 r Notes:	2	2
8	Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? (B2a-d, G1,2,4) Yes = $6 \text{ No} = 0 \text{ Needs Improvement} = 1-5$	6	6
	a. Length of time since last inspection	Yes 🖲	No O Needs Improvement O
	b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)	Yes 💽	No O Needs Improvement
	compliance activities)c. Type of activity being undertaken by operators (i.e. construction)	Yes 💿	Needs
	 d. Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc) 	Yes 💿	No O Improvement Needs Improvement O

9	General Comments:	Info On	lyInfo Or	nly
Thes	se factors are included in the Indiana Risk Model.			
Evaluato	r Notes:			
	f. Are inspection units broken down appropriately?	Yes 🛈	No 🔿	Needs Improvement
	Operators and any Other Factors)			•
	Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment,	Yes 💽	No 🔿	Needs Improvement
	e. Process to identify high-risk inspection units that includes all threats - (Excavation			N7 1

Info Only = No Points Evaluator Notes:

Total points scored for this section: 14

Total possible points for this section: 15

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) Yes = $5 \text{ No} = 0$	5	-	5
	A. Total Inspection Person Days (Attachment 2): 817.00			
	B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7): 220 X 6.85 = 1507.00			
	Ratio: A / B 817.00 / 1507.00 = 0.54			
Evaluato	If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0 Points = 5			
Evaluato	r notes.			
2	Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines for requirements) Chapter 4.4 (A8-A11, G19) Yes = $5 \text{ No} = 0 \text{ Needs Improvement} = 1-4$	5		5
	a. Completion of Required OQ Training before conducting inspection as lead?	Yes 💽	No 🔿	Needs Improvement
	b. Completion of Required DIMP*/IMP Training before conducting inspection as lead? *Effective Evaluation CY2013	Yes 🖲	No 🔿	Needs Improvement
	c. Root Cause Training by at least one inspector/program manager	Yes 💿	No 🔿	Needs Improvement
	d. Note any outside training completed	Yes 💿	No 🔿	Needs Improvement
Evaluato	r Notes:			mprovement
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) Yes = $2 \text{ No} = 0$ Needs Improvement = 1	2]	1
Evaluato		10	1.0.	
Mr.	Allen was appointed to the position less that 1 year ago. He has attended only one Training	g and Qua		n course.
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) $Yes = 2 No = 0$ Needs Improvement = 1	2	2	2
Evaluato	r Notes:			
5 Evaluato	Did State hold PHMSA TQ Seminar in Past 3 Years? Chapter 8.5 (A3) Yes = $2 \text{ No} = 0$	2	2	2
	Y 2010 and again in CY 2013.			
6	Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1 (B3) Yes = $5 \text{ No} = 0 \text{ Needs Improvement} = 1-4$	5		5
Evaluato				
Yes	but not well documented. Can not be readily retrieved.			

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) Yes = $2 \text{ No} = 0 \text{ Needs Improvement} = 1$	2	2
Evaluato	*		
	t forms, except focus subject inspections, are PHMSA forms.		
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) Yes = $1 \text{ No} = 0$	1	1
Evaluato			
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) Yes = $1 \text{ No} = 0$	1	1
Evaluato	r Notes:		
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
Evaluato	Yes = 1 No = 0 r Notes:		
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
Evaluato	Yes = 1 No = 0 r Notes:		
	nspection 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) $Yes = 2 No = 0$ Needs Improvement = 1	2	2
Evaluato			
r es,	but comments need to be documented and indicate when and who reviewed the reports.		
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) Yes = $2 \text{ No} = 0 \text{ Needs Improvement} = 1$	2	2
Evaluato	-		
14	Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission? (G14) Yes = $1 \text{ No} = 0 \text{ Needs Improvement} = .5$	1	1

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
Evaluato	Yes = $2 \text{ No} = 0$ Needs Improvement = 1 or Notes:		
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) Yes = $2 \text{ No} = 0 \text{ Needs Improvement} = 1$	2	1
Evaluato			
Indi	ana needs to inspect OQ program plans and procedures. One operator's last procedures inspec	ction was	in CY 2005.
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) Yes = 2 No = 0 Needs Improvement = 1	2	2
All	operators with HCAs are inspected. A protocol A of the IMP inspection form must be comple have HCAs.	eted for o	perators that do
18	Is state verifying operator's gas distribution integrity management Programs (DIMP)? This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart P DIMP ? First round of program inspections should be complete by December 2014	2	2
	Yes = 2 No = 0 Needs Improvement = 1 or Notes: DIMP inspections are scheduled to be completed by December 31, 2014.		
19	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) PAPEI Effectiveness Inspections should be complete by December 2013	2	2
Evaluato	Yes = $2 \text{ No} = 0 \text{ Needs Improvement} = 1$ or Notes:		
Indi	ana has conducted several inspsection and have scheduled all other inspections.		
20	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) Yes = $1 \text{ No} = 0 \text{ Needs Improvement} = .5$	1	1
Evaluato	or Notes:		
Indi	ana has a website with pertinent information on it. They also send out letter to all operators, a	is needed	

21	Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 (B6) Yes = 1 No = 0 Needs Improvement = .5	1	NA					
Evaluator Notes:								
No	Safety Related Condition Reports were submitted in CY 2012.							
22	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) Yes = $1 \text{ No} = 0 \text{ Needs Improvement} = .5$	1	1					
Evaluato	or Notes:							
23	Did the state participate in/respond to surveys or information requests from NAPSR or PHMSA? (H4) Yes = 1 No = 0 Needs Improvement = .5	1	1					
Evaluato	1							
24		Info Only	Info Only					
24	General Comments:	nno Only	uno Oniy					
Evaluato	Info Only = No Points or Notes:							

Total points scored for this section: 43

Total possible points for this section: 45

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) Yes = $4 \text{ No} = 0 \text{ Needs Improvement} = 1-3$	4		4
	a. Procedures to notify an operator (company officer) when a noncompliance is identified	Yes 🖲	No 🔿	Needs Improvement
Evaluator	b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns r Notes:	Yes 🖲	No 🔿	Needs Improvement
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) Yes = 4 No = 0 Needs Improvement = 1-3	4		4
	a. Were compliance actions sent to company officer or manager/board member if municipal/government system?	Yes 🖲	No 🔿	Needs Improvement
	b. Were probable violations documented?	Yes 💿	No 🔿	Needs Improvement
	c. Were probable violations resolved?	Yes 💿	No 🔿	Needs Improvement
	d. Was the progress of probable violations routinely reviewed?	Yes 💿	No 🔿	Needs Improvement
Evaluator	r Notes:			Improvement *
3	Did the state issue compliance actions for all probable violations discovered? (B15) Yes = $2 \text{ No} = 0$ Needs Improvement = 1	2	,	2
Evaluator Yes,	r Notes: all probable violations were issued a compliance action.			
4	Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary. (B17, B20) Yes = $2 N_0 = 0$	2	 :	2
Evaluator				
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) Yes = $2 \text{ No} = 0 \text{ Needs Improvement} = 1$	2		2
Evaluator				
A mo	onetary penalty was issued.			
6	Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations? Yes = $1 \text{ No} = 0$ Needs Improvement = .5	1		1
Evaluator Yes	r Notes:			
7	General Comments: Info Only = No Points	Info On	lyInfo On	lly

Evaluator Notes:

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



1	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) Yes = 2 No = 0 Needs Improvement = 1	2		2
	a. Acknowledgement of MOU between NTSB and PHMSA (Appendix D)	Yes 💿	No 🔿	Needs
	 b. Acknowledgement of Federal/State Cooperation in case of incident/accident 	-	-	Improvement O Needs
Evaluato	(Appendix E) r Notes:	Yes 🖲	No 🔿	Improvement
2 Evaluato	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) Yes = $1 \text{ No} = 0 \text{ Needs Improvement} = .5$	1		1
Evaluato				
3	Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? (D5) Yes = $3 \text{ No} = 0 \text{ Needs Improvement} = 1-2$	3		3
	a. Observations and document review	Yes 🖲	No 🔿	Needs Improvement
	b. Contributing Factors	Yes 🛈	No 🔿	Needs Improvement
Evaluato	c. Recommendations to prevent recurrences when appropriate r Notes:	Yes 🖲	No 🔿	Needs Improvement
4	Did the state initiate compliance action for violations found during any incident/accident investigation? (D6) Yes = $1 \text{ No} = 0$	1	N	A
Evaluato				
No p	probable violatons were discovered.			
5	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) Yes = $1 \text{ No} = 0 \text{ Needs Improvement = .5}$	1		1
Evaluato				
6	Does state share lessons learned from incidents/accidents? (sharing information, such as: at NAPSR Region meetings, state seminars, etc) (G15) Yes = 1 No = 0	1		1
Evaluato				
7	General Comments: Info Only = No Points	Info On	lyInfo Or	ıly

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Evaluator Notes:

Total points scored for this section: 8 Total possible points for this section: 8



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) $Yes = 2 N_0 = 0$ Needs Improvement = 1	2	2
Evaluat	tor Notes:		
	question is on the inspection form.		
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) Yes = $2 \text{ No} = 0$ Needs Improvement = 1	2	2
Evaluat	tor Notes:		
Ye	s, the records of locate request responses are inspected,		
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) Yes = $2 \text{ No} = 0 \text{ Needs Improvement} = 1$	2	2
Evaluat	tor Notes:		
	e inspector is involved with Indiana Underground Plant Protection Advisory Committee and	Indiana Un	derground Plant
	otection Services (Indiana 811) and Regional Damage Prevention Councils. Attends State with		
lia	ison with public officials, emergency response and excavators.		
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) Yes = $2 \text{ No} = 0$ Needs Improvement = 1	2	2
	tor Notes:		1
	liana URC collects damages and locates, and then calculate the rate of damages compared from a second to use a	om operator	s to operator and
110	m year to year.		
5	General Comments:	Info OnlyIr	nfo Only
Evaluat	Info Only = No Points for Notes:		
Lyarua			

Total points scored for this section: 8 Total possible points for this section: 8

1	Operator, Inspector, Location, Date and PHMSA Representative Info Only = No Points		nfo OnlyInfo Only	
	Name of Operator Inspected: Kirkpatrick Management			
	Name of State Inspector(s) Observed: Jay Sherer			
	Location of Inspection: Fort Wayne, Indiana			
	Date of Inspection: June 19, 2013			
	Name of PHMSA Representative: Leonard Steiner			
Evaluato	r Notes:			
2	Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? (F2) Yes = $1 \text{ No} = 0$	1	1	
Evaluato				
Yes	, the operator's employee was expecting the Indiana inspector to arrive.			
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) Yes = $2 \text{ No} = 0 \text{ Needs Improvement} = 1$	t 2 2	2	
Evaluato The	inspection check list was on the computer, data was entered directly into the computer.			
4	Did the inspector thoroughly document results of the inspection? (F4) Yes = $2 \text{ No} = 0$ Needs Improvement = 1	2 2	2	
Evaluato	r Notes:			
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) Yes = $1 \text{ No} = 0$	1	1	
Evaluato				
6	Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) (F7) Yes = $2 \text{ No} = 0$ Needs Improvement = 1	2 2	2	
	a. Procedures			
	b. Records	\boxtimes		
	c. Field Activities	\boxtimes		
Evaluato	d. Other (please comment)			
7	Did the inspector have adequate knowledge of the pipeline safety program and	2 2	2	

regulations? (Evaluator will document reasons if unacceptable) (F8)

8		inspector conduct an exit interview? (If inspections we should be based on areas covered during time $J_{0} = 0$	
Evaluato		NO - 0	
9		the exit interview, did the inspector identify proons? (if applicable) (F10)	bable violations found during the 1 1
Evaluato		NO = 0	
		iolations were discovered, several suggestions v	were provided to the operator for better operations.
		,	
10	of field States -	Comments: What did the inspector observe in to observations and how inspector performed) Be (Field - could be from operator visited or state in r = No Points	
	a.	Abandonment	
	b.	Abnormal Operations	
	c.	Break-Out Tanks	
	d.	Compressor or Pump Stations	
	e.	Change in Class Location	
	f.	Casings	
	g.	Cathodic Protection	\boxtimes
	h.	Cast-iron Replacement	
	i.	Damage Prevention	
	j.	Deactivation	
	k.	Emergency Procedures	\boxtimes
	1.	Inspection of Right-of-Way	\boxtimes
	m.	Line Markers	
	n.	Liaison with Public Officials	\boxtimes
	0.	Leak Surveys	
	p.	MOP	
	q.	MAOP	
	r.	Moving Pipe	
	S.	New Construction	
	t.	Navigable Waterway Crossings	
	u.	Odorization	\boxtimes
	v.	Overpressure Safety Devices	
	w.	Plastic Pipe Installation	
	х.	Public Education	\boxtimes
	у.	Purging	
	Z.	Prevention of Accidental Ignition	
	A.	Repairs	
	B.	Signs	
	C.	Tapping	
	D.	Valve Maintenance	\boxtimes
	E.	Vault Maintenance	
	F.	Welding	

- G. OQ Operator Qualification
- H. Compliance Follow-up
- I. Atmospheric Corrosion
- J. Other

Evaluator Notes:

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

	H - Interstate Agent State (If Applicable) Poin	ts(MAX)	Score
1 Evaluator	Did the state use the current federal inspection form(s)? (C1) Yes = 1 No = 0 Needs Improvement = .5 Notes:	1	NA
2	Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? (C2) Yes = 1 No = 0 Needs Improvement = .5	n 1	NA
Evaluator	Notes:		
3	Did the state submit documentation of the inspections within 60 days as stated in its lates Interstate Agent Agreement form? (C3) Yes = $1 \text{ No} = 0$ Needs Improvement = .5	t 1	NA
Evaluator	Notes:		
4	Were probable violations identified by state referred to PHMSA for compliance? (NOTE PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) (C4)	: 1	NA
Evaluator	Yes = 1 No = 0 Needs Improvement = .5 Notes:		
5	Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (C5) Yes = $1 \text{ No} = 0 \text{ Needs Improvement} = .5$	1	NA
Evaluator			
6	Did the state give written notice to PHMSA within 60 days of all probable violations found? (C6) Yes = 1 No = 0 Needs Improvement = .5	1	NA
Evaluator			
7	Did the state initially submit documentation to support compliance action by PHMSA on probable violations? (C7) Yes = $1 \text{ No} = 0 \text{ Needs Improvement} = .5$	1	NA
Evaluator			
8	General Comments:	Info OnlyIr	nfo Only
Evaluator	Info Only = No Points		2

Total possible points for this section: 0

PART	I - 60106 Agreement State (If Applicable) P	oints(MAX)	Score	
1	Did the state use the current federal inspection form(s)? (B21) Yes = 1 No = 0 Needs Improvement = .5	1	NA	
Evaluator	Notes:			
2 Evaluator	Are results documented demonstrating inspection units were reviewed in accordance state inspection plan? (B22) Yes = 1 No = 0 Needs Improvement = .5 Notes:	with 1	NA	
3	Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) (B23) Yes = $1 \text{ No} = 0 \text{ Needs Improvement} = .5$	1	NA	
Evaluator				
4	Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (B24) Yes = $1 \text{ No} = 0 \text{ Needs Improvement} = .5$	1	NA	
Evaluator	Notes:			
5	Did the state give written notice to PHMSA within 60 days of all probable violations found? (B25) Yes = $1 \text{ No} = 0 \text{ Needs Improvement} = .5$	1	NA	
Evaluator				
6	Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? (B26) Yes = 1 No = 0 Needs Improvement = .5	y 1	NA	
Evaluator	*			
7	General Comments:	Info OnlyInfo Only		
Evaluator	Info Only = No Points	oju		
	Total poin	Total points scored for this section: 0		

Total points scored for this section: 0

Total possible points for this section: 0