



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

Louisiana Department of Natural Resources

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: Louisiana

Agency Status:

Date of Visit: 03/28/2012 - 05/25/2012

Agency Representative: James Mergist, Asst Director Pipeline Division

PHMSA Representative: Patrick Gaume

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

Name/Title: James H. Welsh, Commissioner

Agency: Louisiana Department of Natural Resources-Office of Conservation

Address: 617 North Third St., 11th floor

City/State/Zip: Baton Rouge, Louisiana 70802

Rating:

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

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.

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
44
14
9
8
12
0
0

10
15
44
14
9
7
12
0
0

TOTALS

112 111

State Rating 99.1

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

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

Evaluator Notes:

A1. Yes. Jurisdictional authority is correctly reported.

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

Evaluator Notes:

A2. YES. 1226 man-days. The report matches internal source spreadsheets.

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

Evaluator Notes:

A3. YES. Attachment 3 is consistent with Attachment 1 and the internal spreadsheet.

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

Evaluator Notes:

A4. YES. The three incidents are verified.

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| 5 | Accuracy verification of Compliance Activities - Progress Report Attachment 5 (A1e)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

A 5. YES. The report is consistent with the prior year and internal worksheets.

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

Evaluator Notes:

A 6. YES. The official files are still paper for most things, but all inspections of the last 4 years are electronic. Necessary information is printed out and placed in the citation file. Citations and historical files will need to be scanned and imported into the electronic database at a future date when the electronic files become the official files

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

Evaluator Notes:

A7. YES

- | | | | |
|---|---|---|---|
| 8 | Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8 (A1h)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

A8. YES

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

Evaluator Notes:

A 9. YES. In 2011 LDNR is active on five NAPSRS Committees. LDNR continues to provide associate staff to TQ. LDNR enforces current Federal Regulations and provides technical information to the LA Legislature to make changes as needed in State Laws. LDNR has helped create and works closely with the LA Common Ground Alliance and has established a working relationship with the State Police to encourage the use and enforcement of excavation damage violations.

Yes; Risk Reduction: The Pipeline Division works closely with the State Police and LA One Call to improve compliance with the one call law and enforcement efforts as well as with the LA Regional CGA to enhance the one call law. In addition, the Pipeline Division's goal of visiting 100% of operators with some type of inspection annually results in increased visibility throughout the state which enhances our public safety efforts. LDNR is involved in monitoring four Cast Iron replacement programs and one PVC replacement program.

10 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

In 2011 LDNR continues to provide associate staff to TQ. LDNR is active on five NAPSRS Committees. LDNR enforces current Federal Regulations and provides technical information to the LA Legislature to make changes as needed in State Laws. LDNR has helped create the LA Common Ground Alliance. The Pipeline Division works closely with the State Police and LA One Call to improve compliance with the one call law and enforcement efforts as well as with the LA Regional CGA to enhance the one call law. In addition, the Pipeline Division's goal of inspecting 100% of operators and units annually results in increased visibility throughout the state which enhances our public safety efforts. LDNR is involved in monitoring four Cast Iron replacement programs and one PVC replacement program.

LDNR continues to be very active in NAPSRS; by actively participating on five committees: Control Room Management; Gas Gathering, Public Awareness Program, Liquid Pipeline Task Group; Gas IMP, and Staffing Formula Task Group. They also support NAPSRS and PHMSA requests for information.

LDNR actively participates in the quarterly Louisiana Regional Common ground alliance meetings. LDNR participates with and supports the efforts of Coastal And Marine Operators (CAMO) Pipeline Industry Initiative whose main purpose is to explore and discuss issues and challenges in preventing spills, releases, and damage to coastal and marine pipelines and environments. LDNR helps organize and co-sponsors the annual Pipeline Safety Seminars for Hazardous Liquid and Natural Gas operators. LDNR works closely with the State Police and LaOneCall to promote 811 and implement safe excavation practices.

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



PART B - Program Inspection Procedures

Points(MAX) Score

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|----------|--|---|---|
| 1 | Standard Inspections (B1a)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

B1. YES. Yes, all are addressed: Pipeline Safety Operations Manual, General Criteria Section, Section 6 Part 1, - Std-not to exceed 60 mo limit, Mstr meters 66 mo limit; (Section 6 Part 2) IMP- 7 to 10 yr limit, reasons include IM reassessment intervals of 7 to 10 years, & personnel resource availability due to other inspection initiatives; OQ- first re-inspection by 12/31/2013 and every 5 calendar years thereafter; Damage Prevention- is part of a Std insp; Operator Training-formal is per oper requests, Seminars, & conferences, informal is during any operator contact or inspection as requested; Constr- construction notice is required and inspection is 'as needed' with actual practice to concentrate on major construction sites; Incident- as determined by the Program Manager and generally includes all significant events; & Follow-up ? within a reasonable amount of time (not to exceed 90 days) after the expiration of the time allowed to achieve compliance.

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|----------|---|---|---|
| 2 | IMP Inspections (including DIMP) (B1b)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

B2. YES. Pipeline Safety Operations Manual, General Criteria Section, (Section 6 Part 2) IMP- 7 to 10 yr limit, reasons include IM reassessment intervals of 7 to 10 years, & personnel resource availability due to other inspection initiatives. GIMP, TIMP, & DIMP are all addressed

- | | | | |
|----------|---|---|---|
| 3 | OQ Inspections (B1c)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

B3. YES. Pipeline Safety Operations Manual, General Criteria Section, (Section 6 Part 2) OQ- first re-inspection by 2013 and every 5 calendar years thereafter

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|----------|--|---|---|
| 4 | Damage Prevention Inspections (B1d)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

B4. YES. Pipeline Safety Operations Manual, General Criteria Section, (Section 6 Part 2) Damage Prevention- is part of a Std insp

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|----------|--|---|---|
| 5 | On-Site Operator Training (B1e)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

B5. YES. Pipeline Safety Operations Manual, General Criteria Section, (Section 6 Part 2) Operator Training-formal is per oper requests, Seminars, & conferences, informal is during any operator contact or inspection as requested

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|----------|---|---|---|
| 6 | Construction Inspections (B1f)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

B6. YES. Pipeline Safety Operations Manual, General Criteria Section, (Section 6 Part 2) Constr- construction notice is required and inspection is 'as needed' with actual practice to concentrate on major construction sites

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

Evaluator Notes:

B7. YES. Pipeline Safety Operations Manual, General Criteria Section, (Section 6 Part 2) Incident- as determined by the Program Manager and generally includes all significant events.

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|----------|---|---|---|
| 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 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 <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f. Are inspection units broken down appropriately? | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

B8. YES. 'Gas Operator Prioritization Model', 'Liquid Operator Prioritization Model' & Pipeline Safety Operations Manual, General Criteria Section, Section 6.

The Gas Operator & Liquid Operator prioritization risk model spreadsheets have been developed (originally from IMP) that are being adapted to all Operators. The model spreadsheets impact the areas of emphasis during the annual inspections. Elements include compliance issues, accidents, leaks, product transported, population density, MAOP as a % of SMYS, total miles of pipeline, corrosion control, & operator responsiveness.

Units are created by Operator, pipe location, Operator management unit, etc.

The risking program has been in use since IMP.

9 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

LDNR is dedicated to being transparent, is making data easily available to the public, is committed to data evaluation for self improvement, understands the emphasis on accident/incident investigations, and has scheduled its personnel for training beyond what is provided by PHMSA T&Q. LDNR's goal of achieving 100% Gas Unit inspections per year, either Std or special, was missed in 2011 (at 65%) due to the hiring of 5 new personnel during 2010 (2) & 2011 (3). Staff transition is continuing as two recent hires have resigned and, as of May 2012, the two vacancies need to be filled. LDNR continues to actively support the Louisiana Common Ground Alliance. LDNR continues to make personnel available to support NAPSR and PHMSA initiatives.

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):
1226.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 10.10 = 2222.56

Ratio: A / B
1226.00 / 2222.56 = 0.55

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

Evaluator Notes:

C1. Yes. 1226 AFO insp-days, 10.1 insp-yrs. $1226 / (10.1 * 220) = 0.55$. $.55 > .38$. okay.

- 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

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|----|--|--------------------------------------|--------------------------|---|
| a. | Completion of Required OQ Training before conducting inspection as lead? | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Completion of Required DIMP*/IMP Training before conducting inspection as lead? *Effective Evaluation CY2013 | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Root Cause Training by at least one inspector/program manager | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. | Note any outside training completed | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

C2. YES. for 2011 they are in compliance with the State Guidelines with the 3 yr attend & 5 yr complete rule for new staff. For the 1 long term inspector needing 1 course; he attempted the course 2011 and is scheduled to take it again in September 2012.

State training- Most inspectors attend the annual 195 Seminar & the 192 Seminar. In addition, several staff attended the 8 hr LSU HAZWOPER REFRESHER COURSE. Some new hires are taking the La Gas Assn one day Seminars on pipe joining, line locating, first aid, leak detection, fire safety, & regulators.

Operator training ? Held the annual T&Q Pipeline Safety Seminar, Conducted and Co-sponsored the annual small gas operator seminar in October, 2011. There were also several individual operator training sessions, usually associated with an inspection.

Non-operator/public training? no activities in 2010 or 2011.

Dana Arabie (TSI 299 11/03) & Jacques Rotolo (TSI 299 9/04) are the OQ Leads. Two other inspectors & two Supervisors are OQ certified.

IMP Leads are Dana Arabie (TSI 297 6/05, TSI 294 8/02, CBT are completed) & Jacques Rotolo (TSI 297 4/06, TSI 294 7/04, CBT are completed).

- 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:

C3. YES. The Program Manager & records review show a professional knowledge of the regulations.

- 4 Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1 (A6-7) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

C4. YES. PHMSA letter was Dec 28, 2011, LDNR response was February 28, 2012. All items were responded to.

- 5 Did State hold PHMSA TQ Seminar in Past 3 Years? Chapter 8.5 (A3) 2 2

Yes = 2 No = 0

Evaluator Notes:

C5. Yes, in the 3rd week of July 2011, 3rd week of July 2010 & the 2nd week of July 2009. Practice is to schedule every year over the last week of July. The next Seminar is scheduled for July 23th week, 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
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Yes = 5 No = 0 Needs Improvement = 1-4

Evaluator Notes:

C6. YES. Units are being inspected in accordance with the Operations Manual Guidelines. Units are tracked through a spread sheet program which tracks Std and special inspections, IM, OQ, PAP, CRM, & D&A.

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
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Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

C7. YES. the LDNR Forms for OQ, IMP, & Standard inspections are created from the current Federal 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)	1	1
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Yes = 1 No = 0

Evaluator Notes:

C8. Yes, it is in the Distribution Std Inspection Form. See subpart M, 192.489.

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
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Yes = 1 No = 0

Evaluator Notes:

C9. Yes. it is in the Distribution Std Inspection Form. See subpart M, 192.489.

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
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Yes = 1 No = 0

Evaluator Notes:

C10. Yes. review procedures during inspections & assure pipeline is leak surveyed from the meter to the mainline during incident investigations. Added a comment at 192.615(A)(7) to check both pipe ends whenever a line gets impacted or pulled.

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
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Yes = 1 No = 0

Evaluator Notes:

C11. YES. it is on the Std Insp Form, per 192.617, and all accidents are followed up with most having on-site investigation

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
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Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

C12. YES. As outlined in the LDNR SOP Sec 6 Part 4, the reports are reviewed by an Engineer for completeness, miles of pipe, & lost and unaccounted for gas and trends it relative to prior years. Also, pipeline mileage is used for assessing user fees so it is closely monitored.

Reportable incidents are investigated relative to minimizing future events, including those due to excavation damage.

Performance indicators include incidents per 1000 miles of pipe; # of inspections performed; # of probable violations; # of probable violations corrected. Tracking data includes incidents per 1000 miles of jurisdictional pipe; total miles of jurisdictional pipe; # of reportable incidents; costs due to reportable incidents; injuries due to reportable incidents; & deaths due to reportable incidents; these numbers are disaggregated to determine national numbers and LDNR State numbers. (Spreadsheet name is Monthly Performance Indicator Report which is summed for the Calendar year).

Reports are received, followup is made, paperwork is checked, lessons learned are derived, Incident causes and regulatory compliance are determined, and site visits are usually made. Inspector duties are strongly outlined in SOP section 11.

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| 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 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|

Evaluator Notes:

C13. YES. All of the OQ and IMP inspections for 2011 have been uploaded, typically within 1 month of the inspection. The focus in 2011 was to conduct Protocol 9 OQ inspections of operators with emphasis on the covered task for valves and corrosion control, & to close out any open OQ violations. The IMP emphasis was to finish GIMP for all operators. DIMP was started in 2011 with DIMP inspections of two operators. LDNR target for the first round completion of DIMP is for 12/31/2013.

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

C14. YES. This was added in 2009 onto question 192.605(b)(3) on the Standard Inspection.

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| 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)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|

Evaluator Notes:

C15. YES. 199.101, 199.103, 119.113, and 199.117 are referenced in detail in the LDNR Drug & Alcohol Form which includes Fed Form 13 and much of Fed Form #3.1.11. In addition Fed Form #3.1.11 is used during HQ D&A inspections. This issue is addressed on the Fed Form #3.1.11 on question A.02.b.

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| 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 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|

Evaluator Notes:

C16. YES. I.4. Yes. All Operators have been OQ inspected and re-inspections are scheduled to be complete by 12/31/2013. Several Protocol 9 inspections are done every year. Operators have been made to be fully aware of the OQ requirements and their obligation to stay in compliance.

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| 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 O (I8-12)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

C17. YES. All Operators have been contacted. All Operators have either declared they have prepared a GIMP program or declared they have no HCAs through using Protocol A. GIMP inspections are being conducted and uploaded into the fed database every year. The remaining Operators are being inspected at the rate of one per month. As of 5/12 all Operators have had their first inspection. As of 5/12 the impact radii has been verified, compliance with subpart O has been checked,

and integrity assessments and remedial actions have been checked for compliance with their plan for all intrastate gas operators in LA. Gas Operators were submitting semi-annual reports for miles of HCA. Changes of HCA reported are followed up on. Starting in 2011 the information is reported in the Annual Reports.

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| 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
Info Only = No Points | Info OnlyInfo Only |
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Evaluator Notes:

C18. YES. The first two DIMP inspections were done in 2011, and the completed forms were emailed to Chris McLaren as per current guidelines.

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| 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)
Yes = 2 No = 0 Needs Improvement = 1 | 22 |
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Evaluator Notes:

C19. YES. LDNR has verified the status of every operators' public awareness program either by use of the Clearinghouse or by direct submission of their plans to LDNR. PAPEI were started in 2011. LDNR Inspectors have received PAPEE instruction and are using the PAPEI Form. Until the PHMSA PAP database is operational, completed inspections are being emailed to Christie Murray as per instructions.

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| 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 No = 0 Needs Improvement = .5 | 11 |
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Evaluator Notes:

C20. YES. LDNR is providing a Pipeline Safety Seminar every year instead of every 3rd year, Helped create the Louisiana Common Ground Alliance, had one small gas operator seminar in 2011, Have a close association with LA One Call and with the State Police for excavation enforcement. The LDNR website is up and running. The public has access to all pipeline inspections on the website since March, 2008. Access to prior inspections requires an office visit.

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| 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 | 11 |
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Evaluator Notes:

C21. Yes. SRCR are tracked by Steve Giambrone & Mark Champagne, & updates are sent to the Feds.

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| 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 No = 0 Needs Improvement = .5 | 11 |
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Evaluator Notes:

C22. Yes. This has been added as question 192.703(b) on the Standard Inspection. Empirical information indicates almost all bad plastic pipe has already been replaced. Leak histories are monitored to find high leak areas to identify areas with potential bad plastic pipe.

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

C 23. Yes. LDNR works with NAPS, TQ, NTSB, PHMSA, and is on various committees.

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| 24 | General Comments:
Info Only = No Points | Info OnlyInfo Only |
|-----------|--|--------------------|

Evaluator Notes:

C24. LDNR is dedicated to being transparent, is making data easily available to the public, is committed to data evaluation for self improvement, understands the emphasis on accident/incident investigations, and has scheduled its personnel for additional training.

Total points scored for this section: 44
Total possible points for this section: 44



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:

D1. YES. In the LA Administrative Code (LAC 33 LIQUID, & LAC 43 GAS), & is cross referenced to the Pipeline Operations Manual. Through experience, a standard form has been developed. The compliance action specifies the time available for response, and each inspector is responsible to ensure the time frames are adhered to or time extensions are justified. Managers hold inspectors accountable for the timely handling of compliance actions. The Pipeline Division uses a spread sheet maintained by Arlene Andrus to track dates of inspection, citation, time limit for response, targeted re-inspection due date, actual re-inspection date, outcome, & closure dates.

- 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:

D2. YES. The inspection reports are placed in the subject Unit File and the violation letter with evidence are kept together in a violation file. The violation report & evidence are moved to the subject Unit file when it is closed. Records are retained as long as space is available, & at least for 4 years plus current. They also use an internal document ? 'Re-Inspection Form' & if the operator response is sufficient, the form is used to document closure of the compliance action. Also see Form PLS-OR-1: Organization Report, Also see Pipeline Operations Manual, Glossary, Noncompliance.

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

Evaluator Notes:

D3. YES. there were 8 Natural Gas actions in 2011. Reviewed the violation files and the Safety Division is following its procedures.

- 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:

D4. YES. Minor violations were handled informally or with a letter and verified by re-inspection. For 2011, there were no actions where 'show cause' hearings were requested by Pipeline Division, which means that all cited operators complied (or are in the process of complying) with the enforcement actions. The process for 'show cause' hearings is in place. Due process is afforded all & is stated in the violation letters. See LA Administrative Code (LAC 33: V subpart 3 Chapter 313 LIQUID, & LAC 43: XI subpart 3 Chapter 5 GAS)

- 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:

D5. YES. The Program Manager is familiar with the state process for imposing civil penalties. James Mergist and Steve Giambrone are part of a committee to develop procedures and identify precedents for determining civil penalties. Multiple violations are considered.

- 6 Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations? (new question) Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

D6. YES. Fines are assessed and collected every year. In 2011 \$14,500 in fines were assessed in 8 citations and \$10,000 was collected.

7 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

LDNR has a fully developed and implemented Pipeline Safety Program. Procedures are written and followed. Records are kept and properly filed. All compliance tools are used including civil penalties. A draft for a legislative Bill for increased civil penalties was submitted and deferred.

Total points scored for this section: 14
Total possible points for this section: 14



PART E - Incident Investigations

Points(MAX) Score

- 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) 2 2

Yes = 2 No = 0 Needs Improvement = 1

- a. Acknowledgement of MOU between NTSB and PHMSA (Appendix D) Yes ☒ No ☐ Needs Improvement ☐
- b. Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E) Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

E1. YES. See Pipeline SOP, General Criteria, Accident Investigations. Appendix C specifies: 1. Determine if safety violations occurred. 2. Determine root causes of the incident if asked by NTSB. 3. Cooperate with NTSB. The MOU between NTSB and OPS is understood, and LDNR Pipeline Division fully cooperates with NTSB. In 2011 there were 3 reportable incidents, 3 reports, plus follow up of several non-reportable incidents when notification was received.

- 2 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) 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

E2. YES. Telephonic contact is made, and the 'Telephonic Leak Report' is used. The information received is used to determine if an on-site visit is required. 3 of the 3 Federally reportable incidents had a field visit.

- 3 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? (D5) 3 3

Yes = 3 No = 0 Needs Improvement = 1-2

- a. Observations and document review Yes ☒ No ☐ Needs Improvement ☐
- b. Contributing Factors Yes ☒ No ☐ Needs Improvement ☐
- c. Recommendations to prevent recurrences when appropriate Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

E3. Yes, Yes, Yes. LDNR uses the federal pipeline failure investigation form when an on-site investigation is made. The events are documented and Appendix C is followed. Including findings of fact, probable cause, and to determine if Pipeline Safety Regulations were followed.

- 4 Did the state initiate compliance action for violations found during any incident/accident investigation? (D6) 1 1

Yes = 1 No = 0

Evaluator Notes:

E4. YES. of the 3 incidents, 3 reviews are complete and no violations were found

- 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) 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

E5. YES. The Safety Division has regular contact with PHMSA SW Region and DC to ensure that accident/incident reports are accurate & updated. There were no such requests in 2010 or 2011.

- 6 Does state share lessons learned from incidents/accidents? (sharing information, such as: at NAPS Region meetings, state seminars, etc) (G15) 1 1

Yes = 1 No = 0

Evaluator Notes:

E6. YES. LDNR makes a report during the SW Region NAPS Region Meeting, and responds as appropriate to email correspondence.

In example; A fully OQ qualified Contractor/Operator, who also teaches & certifies others, failed to follow procedures and got himself and a co-worker burned at a location.

This is a classic example of a trained individual being over-confident in his abilities and failing to use industry best practices. This report was reported in SW NAPSR 2011.

7 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

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



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)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

F1. Yes. It is on LDNR's advisory bulletin list attached to the Std Insp Form. Starting in 2009, this question was also added to the Std Insp Form, subpart L, Damage prevention, 192.614(a).

- | | | | |
|---|--|---|---|
| 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 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

F2. Yes. It is in the Std Insp Form, under Damage Prevention, 192.614(c)(1-6).

- | | | | |
|---|---|---|---|
| 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 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

F3. Yes. LDNR helped create the Louisiana Common Ground Alliance in 2008. LDNR has been promoting the Best Practices document for the past several years. The State Police are issuing citations and fines for excavation damages.

- | | | | |
|---|--|---|---|
| 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 No = 0 Needs Improvement = 1 | 2 | 1 |
|---|--|---|---|

Evaluator Notes:

F4. NI. 1 pt. The Louisiana One Call is tracking this data in the form of number of locate requests per damage event. In 2007 it was 176 locates per damage, in 2008 it was 185 locates per damage, in 2009 it was 221 locates per damage, and in 2010 it was 192 locates per damage. I advised LDNR that other states have implemented DIRT or Virtual DIRT and strongly recommended that they implement DIRT or equivalent. More analysis & trending is needed; have # calls and # damages by region but as yet it is not disaggregated into more specific information. DIRT was not used in 2010 or 2011.

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

Evaluator Notes:

Total points scored for this section: 7
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:

Varibus LLC, opid 21153

Name of State Inspector(s) Observed:

Paul M Arabie, LDNR Inspector

Location of Inspection:

Quality Inn-Sulphur, LA

Date of Inspection:

3/28-29/12

Name of PHMSA Representative:

Patrick Gaume, PHMSA State Liaison

Evaluator Notes:

Specialized Inspection (maintenance items) Varibus LLC, opid 21153, Baton Rouge Unit (maintenance records), & Lake Charles Unit (maintenance records and Field Inspection), Paul M Arabie LDNR Inspector, Quality Inn-Sulphur, LA, 3/28-29/12, Patrick Gaume PHMSA State Liaison

- 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:

Yes, Varibus and its Operating Contractor ? PB Energy Storage Services, Inc, were notified and three PB Energy personnel participated in 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:

Yes, this Specialized Inspection is a subset of the full LDNR Standard inspection (MPIRE) which is based on the current Federal Form 1 plus State Regulations plus addendum questions required by State Programs.

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

Evaluator Notes:

Yes, the inspection form is data based and all questions MUST be answered and must include explanations for all U, NA, or NC entries before the inspection can be closed out.

- 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:

Yes, multi-meter, half -cell, hand tools, and keys.

- 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 ☐

b. Records ☒

c. Field Activities ☒

d. Other (please comment) ☐

Evaluator Notes:

Yes, for Records and Field; Procedures had been done previously.

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

Yes, Paul demonstrated full competence to perform these inspections.

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) Yes = 1 No = 0	1	1
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Evaluator Notes:

Yes, Paul commented that the records were in good order with no violations found; he identified problems with signs, markers, and some short bolts where insulator packages had been installed. The Field was otherwise in good shape. The signs and markers were addressed during the inspection.

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

Evaluator Notes:

Yes, Paul commented that the records were in good order with no violations found; he identified problems with signs, markers, and some short bolts where insulator packages had been installed. The Field was otherwise in good shape. The signs and markers were addressed during the inspection.

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. Info Only = No Points	Info Only	Info Only
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- | | | |
|----|-----------------------------------|-------------------------------------|
| a. | Abandonment | <input type="checkbox"/> |
| b. | Abnormal Operations | <input type="checkbox"/> |
| c. | Break-Out Tanks | <input type="checkbox"/> |
| d. | Compressor or Pump Stations | <input type="checkbox"/> |
| e. | Change in Class Location | <input checked="" 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 checked="" type="checkbox"/> |
| j. | Deactivation | <input checked="" 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 checked="" type="checkbox"/> |
| q. | MAOP | <input checked="" type="checkbox"/> |
| r. | Moving Pipe | <input type="checkbox"/> |
| s. | New Construction | <input type="checkbox"/> |
| t. | Navigable Waterway Crossings | <input type="checkbox"/> |
| u. | Odorization | <input 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:

Yes, valve operation, cp, atmos corr, pig trap safety equipment, line markers, signage, site security, fences, locks, safety signs, ROW, bolts, nuts, pipe supports, air/soil interface, flange & valve ratings, MOP, MAOP, pressure gauges, verified safety of isolated pipe, BEST PRACTICE: Doing aerial inspections twice a month in addition to ground inspections, & Rectifiers are read once a month.

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



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

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

Evaluator Notes:

NA-not an Interstate Agent State Program.

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

Evaluator Notes:

NA-not an Interstate Agent State Program.

- | | | | |
|----------|---|---|----|
| 3 | Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? (C3)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

NA-not an Interstate Agent State Program.

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

Evaluator Notes:

NA-not an Interstate Agent State Program.

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

Evaluator Notes:

NA-not an Interstate Agent State Program.

- | | | | |
|----------|---|---|----|
| 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 Notes:

NA-not an Interstate Agent State Program.

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

Evaluator Notes:

NA-not an Interstate Agent State Program.

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

Evaluator Notes:

NA-not an Interstate Agent State Program.

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

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

I.1-7 NA-not a 60106 Agreement State Program.

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

Evaluator Notes:

I.1-7 NA-not a 60106 Agreement State Program.

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

Evaluator Notes:

I.1-7 NA-not a 60106 Agreement State Program.

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

Evaluator Notes:

I.1-7 NA-not a 60106 Agreement State Program.

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

Evaluator Notes:

I.1-7 NA-not a 60106 Agreement State Program.

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|----------|--|---|----|
| 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 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

I.1-7 NA-not a 60106 Agreement State Program.

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

Evaluator Notes:

I.1-7 NA-not a 60106 Agreement State Program.

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