



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

1200 New Jersey Avenue SE
Washington DC 20590

2010 Natural Gas State Program Evaluation

for

MA DEPT. OF PUBLIC UTILITIES

Document Legend

PART:

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



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

State Agency: Massachusetts

Agency Status:

Date of Visit: 07/18/2011 - 07/22/2011

Agency Representative: Christopher J. Bourne

PHMSA Representative: Dino N. Rathod, P.E.

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

Name/Title: Ms, Ann G. Berwick, Chair

Agency: The Commonwealth of Massachusetts -Department of Utilities

Address: One South Station

City/State/Zip: Boston, Massachusetts 02110

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 2010 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. A deficiency in any one part of a multiple part question should be scored as needs improvement. Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual certification/agreement attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART F):

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

Scoring Summary

PARTS

Possible Points Points Scored

A	General Program Qualifications	26	26
B	Inspections and Compliance - Procedures/Records/Performance	24.5	23.5
C	Interstate Agent States	0	0
D	Incident Investigations	7	7
E	Damage Prevention Initiatives	9	9
F	Field Inspection	11	11
G	PHMSA Initiatives - Strategic Plan	9	8.5
H	Miscellaneous	3	3
I	Program Initiatives	9	7

98.5 95

TOTALS

State Rating **96.4**

PART A - General Program Qualifications

Points(MAX) Score

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

SLR Notes:

- 1) Attachment 1- Change "Other" from "F" to "A". Also recheck and revise discrepancy between :Inspection unit Totals in Attachments 1 & 3.
2) Attachment 8- item 1 and 7-h. Please cite MA Law/ Regs for Pipeline Safety and Dig safe Civil Penalty Limits, their Effective date and specify Actual Limits- Daily and Maximum in "Notes section" at the end of Atcthment 8.

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

SLR Notes:

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

SLR Notes:

Joint NEPSR T&Q seminar was held in Meridith, NH in October 2009 and Ogonquit, ME October 2010 . MA was unable to participate in 2009-2010 due to state restriction on travel. I was informed that MA participated in 2007-2008. I discussed and re-emphasized PHMSA's requirement for hosting a T&Q seminar. Chris informed me that MA DPU will be hosting NEPSR seminar in MA in October 2011.

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

SLR Notes:

DPU maintains hard copy and limited capability electronic files. For last several years, we have discussed with MA DPU need for an enahnced capability for database for maintaining inspection , compliance and enforcement records and enable data tracking, sorting capabilities. However efforts by DPU have not succeeded.

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

SLR Notes:

Chris Bourne bring in many years of pipeline safety regulatory experience. He actively particiapted in NASPR and LNG. He has completed required T&Q training. He provides guidance to DPU inspection staff.

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

SLR Notes:

DPU Chairman letter dated January 18, 2011 was sent in 60 days.

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

SLR Notes:

For 2011 no travel restrictions for DPU inspection staff. As a result, MA DPU was able to attend ER NAPSIR meeting in June 2011 and DPU inspectors were able to take out of state required T&Q training.

Personnel and Qualifications

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

SLR Notes:

DPU inspectors were unable to take required training. As noted last year, DPU staff has not completed required T&Q training. DPU provided details of T&Q training status. I was informed that two inspectors failed to successfully complete training courses. DPU agreed to have inspectors rescheduled for taking these courses ASAP and keep me informed of progress on this issue.

- 9 Brief Description of Non-TQ training Activities: Info Only Info Only
Info Only = No Points
For State Personnel:

For Operators:

For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:

SLR Notes:

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

SLR Notes:

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

SLR Notes:

Lead inspector still has not completed all IMP training requirements. DPU inspector is now wait-listed for taking PL 1250 course (See Question A-8. for loss of 3 points)

- 12 Was the ratio acceptable of Total inspection Person-days to Total Person-days charged to the program by state inspectors? (Region Director may modify points for just cause) (Chapter 4.3) Previous Question B.12 5 5
Yes = 5 No = 0
A. Total Inspection Person Days (Attachment 2):
944.60
B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 8.00 = 1760.00
Ratio: A / B
944.60 / 1760.00 = 0.54
If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0
Points = 5

SLR Notes:

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

SLR Notes:

DPU inspector Ron Danielson has retired, DPU intends to add two more inspectors shortly (1 1/2 persons for gas safety program)

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

SLR Notes:

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



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

Points(MAX) Score

Inspection Procedures

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

SLR Notes:

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

SLR Notes:

Suggested to DPU to review and revise various time intervals as described in different sections. DPU agreed to consolidate information in a single place to simplify inspection procedures manual.

Inspection Performance

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

SLR Notes:

DPU will review and consolidate information scattered in various sections and may use a tabular form (Appendix to Procedure Manual)

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

SLR Notes:

DPU does not use or fill in Check lists/ inspection forms for all planned inspection activities . Efforts to make changes to current database to an improved electronic database for inspection records has shown no progress. I discussed and emphasized need for viable progress as part of an exit interview with MA DPU Commissioner.

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

SLR Notes:

DPU does not use or fill in Check lists/ inspection forms for all planned inspection activities.

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

SLR Notes:

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

SLR Notes:

- | | | | |
|----------|--|----|----|
| 8 | Did the state review operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance) (NTSB) Previous Question B.8 | .5 | .5 |
| | Yes = .5 No = 0 | | |

SLR Notes:

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|----------|---|----|----|
| 9 | Did the state review operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21? (NTSB) Previous Question B.9 | .5 | .5 |
| | Yes = .5 No = 0 | | |

SLR Notes:

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|-----------|--|---|---|
| 10 | Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 192.617? (NTSB) Previous Question B.10 | 1 | 1 |
| | Yes = 1 No = 0 | | |

SLR Notes:

Compliance - 60105(a) States

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

In CY 2011 Certification DPU provided following Compliance Action information .

Carry Over from Previous Years- 8

Number Found (in CY 2010) 11

Number Corrected 15

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

SLR Notes:

Discussed with DPU need for review for timely resolution of incident related compliance and enforcement actions against code violators. Unnecessary delay may impact resolution and pending remedial actions to pipeline safety. DPU agreed to address this concern.

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

Compliance - 60106(a) States

- 21** Did the state use the current federal inspection form(s)? Previous Question D(2).1 1 NA
Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

- 22** Are results adequately documented demonstrating inspection units were reviewed in accordance with state inspection plan? Previous Question D(2).2 1 NA
Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

- 23** Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) Previous Question D(2).3 1 NA

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

- | | | | |
|--------------------------------------|---|-----------|----|
| 27 | Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken) | Info Only | NA |
| <small>Info Only = No Points</small> | | | |

SLR Notes:

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

SLR Notes:

- 1 MA DPU is an intrastate natural gas state 60105(a).
- 2 Comments for DPU's "General Inspection Procedures Manual".
Discusse dwith Chris Bourne need to review and revise write-up to simplify and add needed information as "Attachement or an Appendix" in one place.
Informaton can be in a tabular form and easy to follow and revise.
- 3 DPU to review General Inspection Manual on a periodic basis and upon completion of Annual Certification Process in FedStar. DPU may use updated information to revise Inspection Procedures document, PHMSA's revised Guideline Manual (available via FedStar)

Total points scored for this section: 23.5
Total possible points for this section: 24.5



PART C - Interstate Agent States

Points(MAX) Score

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

SLR Notes:

MA DPU is not an interstate Agent State

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

SLR Notes:

MA DPU is not an interstate Agent State

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

SLR Notes:

MA DPU is not an interstate Agent State

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|----------|---|---|----|
| 4 | Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) Previous Question D(3).4
Yes = 1 No = 0 | 1 | NA |
|----------|---|---|----|

SLR Notes:

MA DPU is not an interstate Agent State

- | | | | |
|----------|--|---|----|
| 5 | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question D(3).5
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

SLR Notes:

MA DPU is not an interstate Agent State

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

SLR Notes:

MA DPU is not an interstate Agent State

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

SLR Notes:

MA DPU is not an interstate Agent State

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

SLR Notes:

MA DPU is not an interstate Agent State

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

PART D - Incident Investigations

Points(MAX) Score

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

Discussed with DPU for timely resolution and completion of pending Incident Investigation Reports and resulting compliance actions. I emphasized need for finalizing all pending actions in timely manner to have more effective pipeline safety. DPU will review and make appropriate adjustments, as necessary. (Guideline Manual Ch 5.2 and 6.1)

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



PART E - Damage Prevention Initiatives

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? Previous Question B.11
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

DPU has reviewed the Operator's plans and procedures. DPU indicated that directional drilling is less frequently used in MA because of ledge and rock.

- | | | | |
|----------|--|---|---|
| 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? New 2008
Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

DPU inspectors have reviewed procedures and responses for markouts. The DPU has also cited operators for failure to mark or mark correctly.

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

SLR Notes:

DPU participates in the MUST Program which provides training seminars for stakeholder groups such as contractors. DPU's website contains a link to the Dig Safe website. This website has a downloadable version of the CGA Best Practices on it

- | | | | |
|----------|---|---|---|
| 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? New 2008
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

DPU does collect and analyze damage data for trends.

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

SLR Notes:

DPU conducted extensive investigations into incidents like the one in Jenny Lind St., N. Easton, and Grove St., Weston. A Bay State Gas contractor hit and broke a service line to a house in N. Easton. As a result, BSG had to pay a civil penalty and change their procedures and training.

In Weston, a National Grid (NG) employee failed to use his laptop correctly to access records. The house was destroyed because the location of the service line wasn't properly marked. National Grid paid civil penalties for violations of the Dig Safe Law and Pipeline Safety regulations and also changed their training procedures because of the incident.

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

SLR Notes:

MA DPU has a strong and mature damage prevention program. DPU participates actively with various stakeholders.

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

PART F - Field Inspection

Points(MAX) Score

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

Name of Operator Inspected:

N Star

Name of State Inspector(s) Observed:

Jorge Santi; Richard Wallace

Location of Inspection:

Fairmont Ave at River Street, Hyde Park and Westwood -N Star HQ

Date of Inspection:

07/19/2011

Name of PHMSA Representative:

Dino N. Rathod, P.E.

SLR Notes:

Pipe replacement- bare steel and cast iron with med density plastic pipe; DIMP implementation status overview

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

SLR Notes:

Both NSTAR Rep and Contractor Forman were notified and present at jobsite

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

SLR Notes:

PHMSA Form was used to document inspector observations. I also received an IOM for DIMP status review of NStar.

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

SLR Notes:

DPU inspector filled -in applicable portions of PHMSA form.

5 Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps, pyrometer, soap spray, CGI, etc.) New 2008 1 1
Yes = 1 No = 0

SLR Notes:

DPU inspector noted that Pressure testing chart recorder did not work properly. Pressure test work was halted at site.

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

SLR Notes:

Construction- pipe replacement and pressure test; NSTAR IMP implementation status review

7 Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) New 2008, comprehensive question worth 2 points total 2 2
Yes = 2 No = 0 Needs Improvement = 1

a.	Procedures	<input type="checkbox"/>
b.	Records	<input type="checkbox"/>
c.	Field Activities/Facilities	<input checked="" type="checkbox"/>
d.	Other (Please Comment)	<input checked="" type="checkbox"/>

SLR Notes:

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

SLR Notes:

DPU inspectors Jorge and Richard have pipeline safety knowledge and regulatory experience and taken required T&Q courses.

- | | | | |
|----------|--|---|---|
| 9 | Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) Previous Question F.10
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

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

SLR Notes:

No probable violations were found during this field activity.

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

SLR Notes:

Jorge Santis observed construction replacement of existing cast iron and bare steel mains in Hyde Park at Fairmont Ave and River Street. Contractor Devereaux crew was preparing for a pressure test. Jorge also checked OQ qualification records and One Call locate markouts

Richard Wallace discussed NSTAR DIMP implementation status update. NSTAR made a presentation of DIMP program implementation.

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

SLR Notes:

- | | | | |
|-----------|--|-------------------------------------|-----------|
| 13 | Field Observation Areas Observed (check all that apply)
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 type="checkbox"/> | |
| | h. Cast-iron Replacement | <input checked="" 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 type="checkbox"/> | |
| | m. Line Markers | <input 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 type="checkbox"/>
v.	Overpressure Safety Devices	<input type="checkbox"/>
w.	Plastic Pipe Installation	<input checked="" type="checkbox"/>
x.	Public Education	<input type="checkbox"/>
y.	Purging	<input type="checkbox"/>
z.	Prevention of Accidental Ignition	<input type="checkbox"/>
A.	Repairs	<input type="checkbox"/>
B.	Signs	<input type="checkbox"/>
C.	Tapping	<input type="checkbox"/>
D.	Valve Maintenance	<input type="checkbox"/>
E.	Vault Maintenance	<input type="checkbox"/>
F.	Welding	<input type="checkbox"/>
G.	OQ - Operator Qualification	<input checked="" type="checkbox"/>
H.	Compliance Follow-up	<input type="checkbox"/>
I.	Atmospheric Corrosion	<input type="checkbox"/>
J.	Other	<input type="checkbox"/>

SLR Notes:

NSTAR DIMP implementation status update review

14 Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

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



PART G - PHMSA Initiatives - Strategic Plan

Points(MAX) Score

Risk base Inspections - Targeting High Risk Areas

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

Risk Factors (criteria) to consider may include:

Miles of HCA's, Geographic area, Population Density

Length of time since last inspection

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

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

SLR Notes:

1 DPU has assigned at least one inspector to each of the 11 LDCs in the state. The largest LDC, National Grid, which has about 800,000 customers, has four inspectors assigned to cover it. The next two largest LDCs, Columbia Gas of MA and NSTAR, each have three inspectors covering them.

2 DPU also reviews operator history, various possible threats into account.

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

SLR Notes:

Yes, inspection units are determined based on the operations office of the LDCs. Smaller LDCs are considered as one Inspection Unit (IU). Larger operators (National Grid, Columbia Gas of MA, NSTAR) are broken into multiple IUs. Berkshire Gas has been divided into two IUs because the distance between divisions forces them to have two operations offices. In addition, each of the LNG plants is considered to be one IU

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

SLR Notes:

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

SLR Notes:

As noted before, more state inspectors are assigned to large LDCs. Most of these LDCs customers are in cities and urban areas (Boston, Worcester, Springfield, etc) in consideration of high population densities, older pipe systems (CI and bare steel) and leak histories.

Use of Data to Help Drive Program Priority and Inspections

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

SLR Notes:

DPU tabulates reports on Underground Damage Reports received, NOPVs issued and civil penalties assessed and collected

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

SLR Notes:

The annual reports have been reviewed and put into Excel spreadsheets

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

SLR Notes:

Yes. The Summary Reports have been reviewed to look at trends for items such as Cast Iron/Bare Steel pipe replacement activities, leak repair status and unaccounted for gas.

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

SLR Notes:

Yes. As part of each accident-investigation, the LDCs reports to PHMSA are reviewed for accuracy.

9	Does state do evaluation of effectiveness of program based on data? (i.e. performance measures, trends, etc.)	.5	0
Yes = .5 No = 0			

SLR Notes:

I discussed with DPU. At this point, it was evident that the DPU does not have any formalized procedure/methodology to evaluate and document effectiveness of Pipeline Safety Program. I encouraged that efforts be made to sort out various data being collected and perform analysis and develop trends, as necessary. DPU's lack of enhanced IT capabilities was also brought up in my exit interview discussions with DPU Commissioner. Chris agreed to resolve this issue ASAP.

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

SLR Notes:

Yes, the two OQ Protocol 9 Inspection results have been uploaded into the PHMSA OQ database in 2011.

11	Did the State submit their replies into the Integrity Management Database (IMDB) in response to the Operators notifications for their integrity management program? Previous Question B.16	.5	NA
Yes = .5 No = 0			

SLR Notes:

12	Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17	.5	0.5
Yes = .5 No = 0			

SLR Notes:

DPU uploaded IMP inspection results in May 2007. No other IMP activities were performed or results uploaded recently. I discussed IMP inspections and need for performing this activity ASAP pending resolution of training issues.

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

SLR Notes:

14	Has state confirmed transmission operators have submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submission?	.5	NA
Yes = .5 No = 0			

SLR Notes:

Nothing specific to MA.

Accident/Incident Investigation Learning and Sharing Lessons Learned

15	Has state shared lessons learned from incidents/accidents? (i.e. NAPSIR meetings and communications)	.5	0.5
Yes = .5 No = 0			

SLR Notes:

Yes, a copy of each completed accident investigation report is sent to the Operator involved and any other interested persons. Copies are available to anyone requesting them.

16	Does the State support data gathering efforts concerning accidents? (Frequency/Consequence/etc)	.5	0.5
Yes = .5 No = 0			

SLR Notes:

DPU generally works closely with data gathering efforts, when requested.

17	Does state have incident/accident criteria for conducting root cause analysis?	Info Only	Info Only
Info Only = No Points			

SLR Notes:

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

Info Only Info Only

Info Only = No Points

SLR Notes:

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

.5

0.5

Yes = .5 No = 0

SLR Notes:

Chris Bourne completed Root Cause Analysis training in June 2011

Transparency - Communication with Stakeholders

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

.5

0.5

Yes = .5 No = 0

SLR Notes:

ProgramaManager Chris typically meets with the MA Gas Advisory Council about three times a year. The Dig Safe Compliance Officer attends Dig Safe Board Meetings.

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

.5

0.5

Yes = .5 No = 0

SLR Notes:

DPU has a website. It is currently be edited to include expanded Dig Safe information, Dig Safe violations and accident reports (example-- Hopkinton incident)

22 Part G: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

Total points scored for this section: 8.5

Total possible points for this section: 9

PART H - Miscellaneous

Points(MAX) Score

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

SLR Notes:

- 1) The DPU Pipeline Div. participated in the DPU's rulemaking and plan reviews of gas company Emergency Response Plans (ERP). In 2009, in response to an ice storm that left many people without power for up to two weeks, the Legislature passed a law requiring that each electric and gas utility have a their ERPs reviewed and approved by the DPU annually.
- 2) The Pipeline Division completed the investigations of four gas incidents that occurred in CY2009. The four incidents were in Barnstable, Somerset, Maynard and Gloucester. Copies of the final reports were sent to PHMSA. Investigations of three more gas incidents are continuing

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

SLR Notes:

Changes to the MA Dig Safe Law are being proposed by the DPU. These changes would include raising the maximum civil penalty from \$10,000 to \$25,000, increasing the length of time a violator is considered as a repeat offender from 12 months to 36 months and requiring Dig Safe tickets to be renewed after 30 days. The changes have been sent to Secretariat for their approval. If they approve of the proposal, they will send it to the Governor's Office. The Governor's Office could file the bill in the Legislature.

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

SLR Notes:

DPU closely monitors replacement of cast iron and bare steel pipes in MA. CY 2010 approx 75 miles of CI and 64 miles of bare steel pipes were replaced. MA has strong Dig Safe enforcement. DPU found 1037 dig safe violations. 178 NOPVs were issued to utilities and excavators, resulted in collection of civil penalty amount of \$234,000.

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

SLR Notes:

- | | | | |
|----------|---|----|-----|
| 5 | Sharing Best Practices with Other States - (General Program)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

DPU attends ER NASPR and NEPSR meetings and share pipeline safety related issues.

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

SLR Notes:

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

PART I - Program Initiatives

Points(MAX) Score

Drug and Alcohol Testing (49 CFR Part 199)

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

SLR Notes:

DPU did not perform any D&A inspection activities during CY 2010. I discussed and re-emphasized need for D&A inspections. DPU agreed to perform during remaining 2011.

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

SLR Notes:

DPU did not perform any D&A inspection activities during CY 2010. I discussed and re-emphasized need for D&A inspections. DPU agreed to perform during remaining 2011

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

SLR Notes:

DPU did not perform any D&A inspection activities during CY 2010. I discussed and re-emphasized need for D&A inspections. DPU agreed to perform during remaining 2011

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

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

SLR Notes:

DPU has reviewed OQ program and uploaded in federal OQDB in March/ April 2011.

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

SLR Notes:

DPU has reviewed OQ program and uploaded in federal OQDB in March/ April 2011

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

SLR Notes:

DPU has reviewed OQ program and uploaded in federal OQDB in March/ April 2011

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

SLR Notes:

DPU has reviewed OQ program and uploaded in federal OQDB in March/ April 2011

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

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

SLR Notes:

DPU performed IMP inspection and uploaded in ferderal IMDB May 2007

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

SLR Notes:

10	Has the state reviewed operator IMPs for compliance with Subpart O? (In accordance with State Inspection plan) Yes = .5 No = 0	.5	0.5
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SLR Notes:

DPU performed IMP inspection and uploaded in ferderal IMDB May 2007

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

SLR Notes:

DPU performed IMP inspection and uploaded in ferderal IMDB May 2007

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

SLR Notes:

DPU performed IMP inspection and uploaded in ferderal IMDB May 2007

Public Awareness (49 CFR Section 192.616)

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

SLR Notes:

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

SLR Notes:

DPU received as part of planned inspection activities. Reviewed records/ procedures

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

SLR Notes:

DPU received as part of planned inspection activities. Reviewed records/ procedures

16	Is the state verifying that operators have evaluated their Public Awareness programs for effectiveness as described in RP1162? Info Only = No Points	Info Only	Info Only
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SLR Notes:

17	Part I: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only
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SLR Notes:

I discussed with Chris Bourne issue of performing needed inspection activities for integrity management (IMP and DIMP); Operator Qualification (OQ), Drug & Alcohol (D&A) and Public Awareness. It should be comprehensive to include pertinent procedures, records, field verification / remedial activities for IMP/ OQ). PHMSA has already emphasized need for conducting these activities.

Total points scored for this section: 7

Total possible points for this section: 9