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

1200 New Jersey Avenue SE
Washington DC 20590

2019 Gas State Program Evaluation

for

IOWA UTILITIES BOARD

Document Legend
PART:

- O -- Representative, Dates and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- State Qualifications
- D -- Program Performance
- E -- Field Inspections
- F -- Damage prevention and Annual report analysis
- G -- Interstate Agent/Agreement States

2019 Gas State Program Evaluation -- CY 2019

Gas

State Agency: Iowa
Rating:
Agency Status:
60105(a): Yes **60106(a):** No **Interstate Agent:** Yes
Date of Visit: 01/01/1900 - 01/01/1900
Agency Representative: Magid Yousif, Manager of Safety and Engineering Section
PHMSA Representative: Don Martin
Commission Chairman to whom follow up letter is to be sent:

Name/Title: Geri D. Huser, Chair
Agency: Iowa Utility Board
Address: 1375 East Court Avenue, Room 69
City/State/Zip: Des Moines, Iowa 50319

INSTRUCTIONS:

Complete this evaluation in accordance with the Evaluator Guidance for conducting state pipeline safety program evaluations. The evaluation should generally reflect state program performance during CY 2019 (not the status of performance at the time of the evaluation). 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 appropriate notes/comments section. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and they OBJECTIVELY reflect the state's program performance for the question being evaluated. Increasing emphasis is being placed on how the state pipeline safety programs conduct and execute their pipeline safety responsibilities (their 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.

Scoring Summary

PARTS		Possible Points	Points Scored
A	Progress Report and Program Documentation Review	0	0
B	Program Inspection Procedures	15	15
C	State Qualifications	10	10
D	Program Performance	50	48
E	Field Inspections	15	15
F	Damage prevention and Annual report analysis	4	4
G	Interstate Agent/Agreement States	0	0
TOTALS		**94**	**92**
State Rating			**97.9**

PART A - Progress Report and Program Documentation Review

	Points(MAX)	Score

1 Were the following Progress Report Items accurate? — Info Only | Info Only

Info Only = No Points

a. Stats On Operators Data - Progress Report Attachment 1
b. State Inspection Activity Data - Progress Report Attachment 2
c. List of Operators Data - Progress Report Attachment 3*
d. Incidents/Accidents Data - Progress Report Attachment 4*
e. Stats of Compliance Actions Data - Progress Report Attachment 5*
f. List of Records Kept Data - Progress Report Attachment 6 *
g. Staff and TQ Training Data - Progress Report Attachment 7
h. Compliance with Federal Regulations Data - Progress Report Attachment 8
i. Performance and Damage Prevention Question Data - Progress Report Attachment 10*

Evaluator Notes:

(a. A listing of operators and units in a pdf file was reviewed. The totals represented by the listing matched the numbers in Attachment 1. No issues.

(b. A spreadsheet provided by the IUB containing detail info by inspector was reviewed. The totals for each operator type and inspection type matched the entries in Attachment 2

(c. A listing of operators and units in a pdf file was reviewed. The listing matched the entries in Attachment 3. Unit totals for Operator Type match totals on Attachment 1. No issues.

(d. The Pipeline Datamart confirmed the one incident listed in Attachment 4.

(e. A pdf file detailing the probable violations found for each operator in 2019 was provided by the IUB. A review of the file confirmed the entries on Attachment 5.

(f. Files same as CY2018 and organized the same. No issues.

(g. Completed Mandatory Courses to Lead a Standard Inspection: Magid Yousif; David McCann; Dan O'Connor; Sanel Lisinovic. Inspector Categories appear to be correct. Magid Yousef's total percentage is 113%. A correction should be requested so that total is not greater than 100%.

(h. The IUB has Automatic adoption authority.

(i. No issues.

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

PART B - Program Inspection Procedures

		Points(MAX)	Score
1	Do written procedures address pre-inspection, inspection and post inspection activities for each of the following inspection types: Chapter 5.1 Yes = 5 No = 0 Needs Improvement = 1-4 a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspections b. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually) c. OQ Inspections d. Damage Prevention Inspections e. On-Site Operator Training f. Construction Inspections (annual efforts) g. LNG Inspections	5	5

Evaluator Notes:

The IUB's SAFETY & ENGINEERING SECTION PIPELINE SAFETY PROGRAM INSPECTION AND COMPLIANCE PROCEDURES, revised July 2020, were reviewed.
(a. Section 5.4.1 of the procedures describes Standard Inspection procedures. Section 5.3 describes the Pre-Inspection activities and Section 5.5 describes the Post Inspection activities to be used for all types of inspections. No issues found.
(b. Sections 5.4.6 and 5.4.8, of the procedures describes IMP and DIMP Inspection procedures. Section 5.3 describes the Pre-Inspection activities and Section 5.5 describes the Post Inspection activities to be used for all types of inspections. No issues found.
(c. Section 5.4.3 of the procedures describes Operator Qualification (OQ) Inspection procedures. Section 5.3 describes the Pre-Inspection activities and Section 5.5 describes the Post Inspection activities to be used for all types of inspections. No issues found.
(d. Section 5.4.3 of the procedures describes Damage Prevention Inspection procedures. Section 5.3 describes the Pre-Inspection activities and Section 5.5 describes the Post Inspection activities to be used for all types of inspections. No issues found.
(e. Section 5.4.4 of the procedures describes Operator Training procedures. Section 5.3 describes the Pre-Inspection activities and Section 5.5 describes the Post Inspection activities to be used for all types of inspections. No issues found.
(f. Section 5.4.2 of the procedures describes Construction Inspection procedures. Section 5.3 describes the Pre-Inspection activities and Section 5.5 describes the Post Inspection activities to be used for all types of inspections. No issues found.
(g. Section 5.4.7 of the procedures describes Construction Inspection procedures. Section 5.3 describes the Pre-Inspection activities and Section 5.5 describes the Post Inspection activities to be used for all types of inspections. No issues found.

		Points(MAX)	Score
2	Do written procedures address inspection priorities of each operator, and if necessary each unit, based on the following elements and time frames established in its procedures? Chapter 5.1 Yes = 4 No = 0 Needs Improvement = 1-3 a. Length of time since last inspection b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) c. Type of activity being undertaken by operators (i.e. construction) d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.) 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) f. Are inspection units broken down appropriately?	4	4

Evaluator Notes:

(a. - (d. The IUB's SAFETY & ENGINEERING SECTION PIPELINE SAFETY PROGRAM INSPECTION AND COMPLIANCE PROCEDURES, revised July 2020 were reviewed. Section 4.2 of the procedures describes factors to be considered for priority and scheduling. There are some of areas of the IUB's Inspection, Enforcement, and Incident Investigation Procedures that should be revised to provide clarity. Section 4.2.1 appears to allow inspections of LNG facilities on a five-year interval. However, Section 4.2.4 states LNG facility inspection units will be scheduled for inspection every other year which complies with PHMSA's requirement for state programs. Section 5.4.3 states "The first round of written Operator Qualification plan inspections was completed by December 17, 2005. Element 9 Inspections are to be used during field inspections and construction inspections where applicable to ensure field knowledge of Operator Qualification issues." Operator Qualification plan inspections are required to cover Protocols (Elements in IWUB's terminology) 1 through

9. PHMSA requires Operator Qualification plan inspections to be completed on a five-year interval. Conducting only Protocol 9 inspections does not meet PHMSA's requirements.
(e. The IUB's PROCEDURES FOR SCHEDULING PIPELINE INSPECTIONS states "Risk is accounted for in the inspection schedule through more frequent inspection of small operator units, an aggressive follow-up inspection program, and visits to new operators or personnel. Iowa does not have operators or inspection units with histories, activities, or high risk that would justify extraordinary inspection frequency or conduct. Additional inspections may be conducted if a need is identified. In addition or as an alternative to additional inspections, periodic reports may be required from operators."
(f. The IUB's inspection units appear to be appropriate.

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3 (Compliance Procedures) Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1 — 3 — 3

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

a. Procedures to notify an operator (company officer) when a noncompliance is identified

b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns

c. Procedures regarding closing outstanding probable violations

Evaluator Notes:

The IUB's SAFETY & ENGINEERING SECTION PIPELINE SAFETY PROGRAM INSPECTION AND COMPLIANCE PROCEDURES, revised July 2020, were reviewed.

(a. Section 5.5.1 covers this requirement.
(b. Section 5.5.2 covers this requirement.
(c. Section 5.5.3 covers this requirement.

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4 (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident? — 3 — 3

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

a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports

b. If onsite investigation was not made, do procedures require on-call staff to obtain sufficient information to determine the facts to support the decision not to go on-site.

Evaluator Notes:

(a. Pursuant to 199 IAC chapter 19.17(1), the pipeline operator is required to give email or telephonic notice of all incidents caused from gas escaping from pipeline facilities and resulting in property damages exceeding $15,000, injury requiring overnight hospitalization, or a fatality, emergency shutdown of a liquefied natural gas (LNG) facility, an interruption of service to 50 or more customers, or any other incident considered significant by the utility.
The IUB has established a Duty Officer email address, dutyofficer@iub.iowa.gov, and phone number, (515) 745-2332, for the reporting of incidents. The email and phone line are monitored 24 hours a day, 365 days a year, by IUB staff.
(b. The IUB's procedures state, "The Duty Officer receives the email or takes the message and then notifies the IUB and the leadership team, which includes the Safety and Engineering Manager. The operator will be contacted by the Safety and Engineering Manager or designee for more detailed information. Depending on the incident, the operator may take longer time to complete all the inspections and testing of gas system facilities to confirm whether their facilities are or are not involved in a reported incident. Although additional information may not be available at the time, a communications link is established to keep the Safety and Engineering Manager informed as information becomes available. Each incident is different, but the information surrounding each incident must be analyzed to determine whether an on-site inspection is necessary. In some instances, incidents may be reported but no on-site investigation may be warranted upon receipt of additional information. In those instances, a memo to the Incident File will be created documenting the reason(s) that an on-site investigation was not conducted."
No issues.

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5 General Comments: — Info Only — Info Only

Info Only = No Points

Evaluator Notes:

There were no issues found that resulted in a deduction of points.

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

PART C - State Qualifications

		Points(MAX)	Score
1	Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.4 Yes = 5 No = 0 Needs Improvement = 1-4 a. Completion of Required OQ Training before conducting inspection as lead b. Completion of Required DIMP/IMP Training before conducting inspection as lead c. Completion of Required LNG Training before conducting inspection as lead d. Root Cause Training by at least one inspector/program manager e. Note any outside training completed f. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1)	5	5

Evaluator Notes:

(a. Completed qualification requirements to lead an Operator Qualification Inspection: David McCann; Dan O'Connor, Magid Yousif.
(b. Completed qualification requirements to lead an Transmission Integrity Management Inspection: David McCann; Dan O'Connor. Completed qualification requirements to lead a DIMP Inspection: David McCann; Dan O'Connor, Magid Yousif.
(c. Completed qualification requirements to lead a LNG Inspection: David McCann; Dan O'Connor, Magid Yousif.
(d. Four inspectors have completed Root Cause Training.
(e. No outside training during 2019.
(f. Completed Mandatory Courses to Lead a Standard Inspection: Magid Yousif; David McCann; Dan O'Connor; Sanel Lisinovic.

2	Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1 Yes = 5 No = 0 Needs Improvement = 1-4	5	5

Evaluator Notes:

The Program Manager has completed the mandatory courses to lead a Standard Inspection and has completed Root Cause, OQ, DIMP and LNG training courses. The Program Manager has been in the role, including Acting Manager, for approximately one year. Prior to Program Manager's role he was responsible for program documentation and administrating inspection data and records which allowed him to gain a good knowledge of the requirements to manage a pipeline safety program.

3	General Comments: Info Only = No Points	Info Only	Info Only

Evaluator Notes:

There were no deficiencies found that required a reduction in points in Part B.

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

PART D - Program Performance

		Points(MAX)	Score
1	Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1 Yes = 5 No = 0 Needs Improvement = 1-4 a. Standard (General Code Compliance) b. Public Awareness Effectiveness Reviews c. Drug and Alcohol d. Control Room Management e. Part 193 LNG Inspections f. Construction (did state achieve 20% of total inspection person-days?) g. OQ (see Question 3 for additional requirements) h. IMP/DIMP (see Question 4 for additional requirements)	5	4

Evaluator Notes:

A random selection of inspection units was determined to review inspection records. The IUB provided a spreadsheet with last inspection dates and previous inspection dates for the selected units. The IUB allows up to five years between inspections for each unit, except for LNG which is three years. Section 4.3.4 of the IUB's procedures state "For multi-unit operators and the Iowa Association of Municipal Utilities (IAMU) model plan, will be jointly reviewed by IUB staff every three years, but no more than every five years. Such inspections may be postponed if there have been no substantive revisions, or need for such revision, since the last review. For users of the IAMU model plan, one plan review will be conducted which will be applicable to all users. Because IAMU is not itself an operator, a token operator will be designated as the entity is inspected. Operator-specific material will be reviewed during a standard inspection of that individual operator. Most intrastate transmission pipelines owned by the end users (typically ethanol or industrial plants) are operated under contractual agreement using the programs from another established operator. Those programs are considered reviewed when the "parent" company procedures and the end user are inspected. Any operatorspecific material will be reviewed during a standard inspection."

(a. No issues found.
(b. No issues found.
(c. No issues found.
(d. No issues found.
(e. No issues found.
(f. No issues found.
(g. OQ Plan (Protocols 1 -8) inspections were not conducted for all operators in the last five years. One point is deducted.
(h. No issues found.

		Points(MAX)	Score
2	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. Do inspection records indicate that adequate reviews of procedures, records and field activities, including notes and the appropriate level of inspection person-days for each inspection, were performed? Yes = 10 No = 0 Needs Improvement = 1-9 a. Standard (General Code Compliance) b. Public Awareness Effectiveness Reviews c. Drug and Alcohol d. Control Room Management e. Part 193 LNG Inspections f. Construction g. OQ (see Question 3 for additional requirements) h. IMP/DIMP (see Question 4 for additional requirements)	10	10

Evaluator Notes:

The IUB utilizes the Inspection Assistant system. Upon a review of inspection records for a randomly selected sample of operators, there no issues discovered code requirements coverage. All inspection forms were completed and had adequate documentation for (a. through (h.

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3 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 established in the operator's plan. 49 CFR 192 Part N — 2 — 1

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

A random selection of operators was determined to review OQ inspection records. The IUB provided a spreadsheet with last inspection dates and previous inspection dates for the selected operators. The IUB allows up to five years between inspections for operators. All OQ inspections provided were Protocol 9 only. There were some Protocols 1-8 inspections that were not documented for last five years. One point is deducted.

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4 Is state verifying operator's integrity management Programs (IMP and DIMP)? This should include a review of plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operator's plan(s). 49 CFR 192 Subpart P — 2 — 2

Yes = 2 No = 0 Needs Improvement = 1

a. Are the state's largest operator(s) plans being reviewed annually?

b. Are states verifying with operators any plastic pipe and components that have shown a record of defects/leaks and mitigating those through DIMP plan?

c. Are the states verifying operators are including low pressure distribution systems in their threat analysis?

Evaluator Notes:

A random selection of operators was determined to review IMP and DIMP inspection records. The IUB provided a spreadsheet with last inspection dates and previous inspection dates for the selected operators. The IUB allows up to five years between inspections for operator. There were no instances where the allowed frequency was exceeded for the selected operators.

(a. The IUB's inspection files contained implementation inspections of its largest operators.

(b. The IUB has a question on the IAC inspection form. No issues found.

c. No issues found.

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5 Did the state review the following (these items are NTSB recommendations to PHMSA that have been deemed acceptable response based on PHMSA reviewing these items during the evaluation process): Chapter 5.1 — 2 — 2

Yes = 2 No = 0 Needs Improvement = 1

a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken;

b. 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);

c. 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;

d. 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;

e. 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;

f. Operator procedures for considering low pressure distribution systems in threat analysis?

g. Operator compliance with state and federal regulations for regulators located inside buildings?

Evaluator Notes:

(a. The last segment of cast iron was removed in 2015. There is no known cast iron pipe remaining in Iowa.

(b. The last segment of cast iron was removed in 2015. There is no known cast iron pipe remaining in Iowa.

(c. The IUB has a question on the Standard Inspection Form for Gas Distribution operators.

(d. The IUB has a question on the Standard Inspection Form for Gas Distribution operators.

(e. A question is on the Operation and Maintenance (O&M) Procedures inspection form that inspects the procedures about drilling/boring near an operator's pipeline. It is reviewed when conducting an inspection of operators' O&M Procedures.
(f. The only low pressure in the state is MidAmerican. MidAmerican's plan to replace our low pressure distribution systems within the state of Iowa in the next few years. The IUB meet with MidAmerican annually to discuss the project progress.
(g. IUB checks for proper shutoff and regulator venting for inside meter sets. Alliant was cited regarding an inside regulator in an inspection of the Ames unit in 2019.

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6 Did the State verify Operators took appropriate action regarding advisory bulletins issued since the last evaluation? (Advisory Bulletins Current Year) 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The IUB did not have documentation confirming the IUB verified operators' actions regarding the two advisory bulletins that were published mid-year 2019. The two advisory bulletins were not listed in PHMSA's Guidelines.

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7 (Compliance Activities) 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 10 10

Yes = 10 No = 0 Needs Improvement = 1-9

a. Were compliance actions sent to company officer or manager/board member if municipal/government system?

b. Were probable violations documented properly?

c. Resolve probable violations

d. Routinely review progress of probable violations

e. Did state issue compliance actions for all probable violations discovered?

f. Can state demonstrate fining authority for pipeline safety violations?

g. Does Program Manager review, approve and monitor all compliance actions? (note: Program Manager or Senior Official should sign any NOPV or related enforcement action)

h. Did state compliance actions give reasonable due process to all parties? Including "show cause" hearing, if necessary.

i. Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns

j. Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. (Incident investigations do not need to meet 30/90-day requirement)

Evaluator Notes:

(a. No issues.
(b. Probable violations were documented in the IA inspection report forms.
(c. Follow up inspections were documented to confirm corrective action were completed by the operator.
(d. Progress is reviewed by the Program Manager until closure of a probable violation.
(e. There were no instances found where a probable violation documented in a report and was not issued in a notification to the operator.
(f. Yes, the IUB has used its fining authority as shown on Attachment 5 of the annual Progress Reports.
(g. There were written non-compliance letters that were not sent under the Program Manager's signature.
(h. No issues.
(i. The IUB documents this action on an Exit Briefing Form.
(j. No issues were found. The IUB documents the communication and dates on Exit Briefing Form.

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8 (Incident Investigations) Were all incidents investigated, thoroughly documented, with conclusions and recommendations? 10 10

Yes = 10 No = 0 Needs Improvement = 1-9

a. Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports?

b. Did state keep adequate records of Incident/Accident notifications received?

c. If onsite investigation was not made, did the state obtain sufficient information from the operator and/or by means to determine the facts to support the decision not to go on site?

d. Were onsite observations documented?

e. Were contributing factors documented?

f. Were recommendations to prevent recurrences, where appropriate, documented?

g. Did state initiate compliance action for any violations found during any incident/accident investigation?

h. Did state assist Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA?

i. Does state share any lessons learned from incidents/accidents?

Evaluator Notes:

The Pipeline Datamart confirmed the one incident listed in Attachment 4. ALLIANT ENERGY - INTERSTATE POWER AND LIGHT COMPANY occurring on 03/09/2019 - A contractor installing wall piers on a house where the gas meter sits. The trench created by the contractor cause disturbance on the ground. Due to heavy rain, the ground around the meter subsidence which led to stress on the service line. This caused a release of gas then a house fire.
(a. The IUB has established a Duty Officer email address, dutyofficer@iub.iowa.gov, and phone number, (515) 745-2332, for the reporting of incidents. The email and phone line are monitored 24 hours a day, 365 days a year, by IUB staff.
The Duty Officer receives the email or takes the message and then notifies the IUB and the leadership team, which includes the Safety and Engineering Manager. The operator will be contacted by the Safety and Engineering Manager or designee for more detailed information.
(b. No issues identified.
(c. One incident occurred during 2019. The IUB conducted an investigation on-site.
(d, (e, (f. The IUB's investigation report included observations, contributing factors and recommendations. No probable violations were identified.
(g. No probable violations were identified for the one incident that occurred in 2019.
(h. AID stated acceptable performance in an email dated 7/17/2020.
(i. The IUB provides lessons learned from incidents each year during its presentation at the NAPSR Central Region meeting.

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9 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 — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The IUB responded within 60 days and addressed the deficiencies described in the letter.

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10 Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5 — Info Only — Info Only

Info Only = No Points

Evaluator Notes:

The IUB conducted February 2016 and February 2019.

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11 Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission? — Info Only — Info Only

Info Only = No Points

Evaluator Notes:

The IUB has a question on the IA Standard Inspection Form for Gas Transmission operators. Upon a review of randomly selected Standard Inspections the results to this question were documented.

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12 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). — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The IUB has a website that includes a pipeline safety section. It provides an overview of the IUB program and the state's pipeline safety regulations. It also provides an overview of Damage Prevention and a link to Iowa's Damage Prevention Law. It describes how to access inspection and incident investigation files on the Iowa electronic filing system. Presentations and documents from the Pipeline Safety Seminar are accessible on the site.

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13 Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Both SRC reports were followed up. No information was provided in the Work Management System that indicated improvement is needed. PHP6 produced a report that showed the IUB was late making 10 day notes on an average of 4 days. One SRC Report was closed on 11/4/2019 and the other was closed on 11/5/2019.

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14 Was the State responsive to: — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

a. Surveys or information requests from NAPSR or PHMSA;

b. Operator IM notifications; and

c. PHMSA Work Management system tasks?

Evaluator Notes:

There were no instances found where the IUB was not responsive to survey requests. No IM notifications in CY2019 were found in the PDM. The IUB did have SRC Report tasks for two reports in CY2019. Both were investigated and closure requested within reasonable timeframe.

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15 If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate. — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

There are five waivers that the IUB has issued. The IUB has determined that two of the waivers are no longer required and is proceeding with a process to terminate the waivers and communicate the results to PHMSA. There is one waiver that contains conditions requiring the operator to take additional actions. The IUB is following up on the operator's actions.

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16 Were pipeline program files well-organized and accessible? — Info Only — Info Only

Info Only = No Points

Evaluator Notes:

The file system is the same that was observed for CY2018 Program Evaluation. There were no issues with electronic files used to conduct this evaluation.

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17 Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT). Has the state updated SICT data? — 3 — 3

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

Evaluator Notes:

The CY2020 SICT spreadsheet completed in 2019 by the IUB was reviewed. The projection showed approximately 418 inspection person years annually including approximately 5.44 inspection person days for Design, Testing and Construction Inspections (DTC). The email sent to IUB stated:

"Below is your calendar year 2020 Inspection-day requirement, along with attached state operator summary.

Gas Program ? 418 days

Peer review notes from your State Inspection Calculation Tool submission ? Be sure to look at your construction days in future submissions." Based upon a total of 418 days, the IUB will need to achieve a minimum of approximately 83 inspection person days on DTC inspections.

There was no major concerns expressed by the Peer Review.

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18 Discussion on State Program Performance Metrics found on Stakeholder Communication site.\ http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805 — Info Only — Info Only

Info Only = No Points

Evaluator Notes:

Excavation damages per 1000 tickets (EDT) increased from 2015 through 2019, 2.3 to 3.3 EDT. Iowa's EDT in 2019 is is now above the National Average which is slightly below 3 EDT. Inspection person days per 1000 miles has trended downward (negative direction) since 2016. Inspector Qualification has improved since 2017 reflecting the completion of additional courses. Gas Distribution System Leaks - Number of leak repairs is trending slightly downward (positive); however, outstanding leaks to be repaired at end of year are trending slightly upward (negative). Enforcement - The IUB has

scored at the highest level in evaluations over the past three years. Incident Investigations - The ICC has scored at the highest level in evaluations over the past two years.

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19 Did the state encourage and promote operator implementation of Pipeline Safety Management Systems (PSMS), or API RP 1173? This holistic approach to improving pipeline safety includes the identification, prevention and remediation of safety hazards. Info Only = No Points — Info Only | Info Only

a. https://pipelinesms.org/

b. Reference AGA recommendation to members May 20, 2019

Evaluator Notes:

The IUB did not have documentation encouraging and promoting opeators to incorporate Pipeline Safety Management Systems. The IUB is developing an action plan to accomplish this objective during 2020.

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20 General Comments: Info Only = No Points — Info Only | Info Only

Evaluator Notes:

Question D.1 - OQ Plan (Protocols 1 -8) inspections were not conducted for all operators in the last five years. One point is deducted.

Question D.3 - There were some Protocols 1-8 inspections that were not documented for last five years. One point is deducted.

Total points scored for this section: 48
Total possible points for this section: 50

PART E - Field Inspections

		Points(MAX)	Score
1	Operator, Inspector, Location, Date and PHMSA Representative (enter specifics into the comments box below) Info Only = No Points a. What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc) b. When was the unit inspected last? c. Was pipeline operator or representative present during inspection? d. Effort should be made to observe newest state inspector with least experience	Info Only	Info Only

Evaluator Notes:
Alliant Energy - Wapello, Iowa. Distribution line upgrading feeder line from Town Border Station from steel to 6" HD plastic. The operator was present. Dan O-Conner and Eric Brown from IUB were observed.

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

Evaluator Notes:
Yes, checklist was used covered applicable code items and final checklist was provided for review.

3	Did the inspector adequately review the following during the inspection Yes = 10 No = 0 Needs Improvement = 1-9 a. Procedures (were the inspector's questions of the operator adequate to determine compliance?) b. Records (did the inspector adequately review trends and ask in-depth questions?) c. Field Activities/Facilities (did inspector ensure that procedures were being followed, including ensuring that properly calibrated equipment was used and OQ's were acceptable?) d. Other (please comment) e. Was the inspection of adequate length to properly perform the inspection?	10	10

Evaluator Notes:
a. inspectors checked procedures while on site, provided to them by KS Energy, who was contract crew that day.
b. No applicable records
c. This was 6" HD plastic main from TBS into Wapello, they will eventually remove farm taps and tie into line that will be operating at system pressure and move regulation back to pipeline take point. Inspector verified Central electrofusion machine was in order.
d-e. No issues, this is a several week project.

4	From your observation did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:
I found no issues with inspectors knowledge of process. Dan O'Conner. New Inspector - Eric Brown who started in March was also in attendance.

5	Did the inspector conduct an exit interview, including identifying probable violations? (If inspection is not totally completed the interview should be based on areas covered during time of field evaluation) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:
Scope of what we saw was reviewed with Alliant personnel. No probable violations found.

6	Was inspection performed in a safe, positive, and constructive manner ? Info Only = No Points	Info Only	Info Only

a. No unsafe acts should be performed during inspection by the state inspector
b. What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)
c. Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)
d. Other

Evaluator Notes:
a. The inspectors conducted themselves appropriately and safety.
b. Inspectors observed segment fusions of 6" HD plastic main for large project.
c-d. N/A

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7 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:
No issues found during field evaluation

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

PART F - Damage prevention and Annual report analysis

		Points(MAX)	Score
1	Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues. Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:
A spreadsheet provided by the IUB documented the results of annual report reviews for each operator. Some issues were found and operators were notified to address deficiencies found during the review.

2	Has the state verified that the operators analyze excavation damages for the purpose of determining root causes and minimizing the possibility of a recurrence? (? 192.617) Has the state verified that the operators have appropriately identified excavators who have repeatedly violated one-call laws and damaged their facilities. Have the operators taken steps to mitigate that risks? (? 192.1007) Yes = 2 No = 0 Needs Improvement = 1	2	NA

Evaluator Notes:
The IUB provided spreadsheets that documents the collection of data along with charts illustrating trends. The IUB provided examples of correspondence sent to the four largest operators requesting explanations for problem areas. Pursuant to guidance for CY2019 evaluations this question is NA.

3	Has the state reviewed the operator's annual report pertaining to Part D ? Excavation Damage? Yes = 4 No = 0 Needs Improvement = 1-3 a. Is the information complete and accurate with root cause numbers? b. Has the state evaluated the causes for the damages listed under "One-Call Notification Practices Not Sufficient" (Part D.1.a.)? c. Has the state evaluated the causes for the damages listed under "Locating Practices Not Sufficient" (Part D.1.b)? For each operator, does the state review the following? d. Is the operator or its locating contractor(s) qualified and following written procedures for locating and marking facilities? e. Is the operator appropriately requalifying locators to address performance deficiencies? f. What is the number of damages resulting from mismarks? g. What is the number of damages resulting from not locating within time requirements (no-shows)? h. Is the operator appropriately addressing discovered mapping errors resulting in excavation damages? i. Are mapping corrections timely and according to written procedures? j. Has the state evaluated the causes for the damages listed under "Excavation Practices Not Sufficient" (Part D.1.c.)?	4	NA

Evaluator Notes:
The IUB provided spreadsheets that documents the collection of data along with charts illustrating trends. Pursuant to guidance for CY2019 evaluations this question is NA.

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? Yes = 2 No = 0 Needs Improvement = 1 a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public. b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages? c. Has the state evaluated which of the following best describes the reason for the excavation damages; i.e., operator or contractor not following written procedures, failure to maintain marks, failure to support exposed facilities, failure to use hand tools were required, failure to test-hole (pot hole), improper backfilling practices, failure to maintain clearance or insufficient excavation practices.	2	2

d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?

Evaluator Notes:

The IUB provided spreadsheets that documents the collection of data along with charts illustrating trends. The IUB provided examples of correspondence sent to the four largest operators requesting explanations for problem areas.

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5 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no deficiencies which resulted in the loss of points.

Total points scored for this section: 4
Total possible points for this section: 4

PART G - Interstate Agent/Agreement States

		Points(MAX)	Score
1	Were all inspections of interstate pipelines conducted using the Inspection Assistant program for documenting inspections. Info Only = No Points	Info Only	Info Only

Evaluator Notes:
The IUB was not assigned any interstate facilities inspections in CY2019.

2	If inspections were conducted independent of a PHMSA team inspection was notice of all identified probable violations provided to PHMSA within 60 days. Info Only = No Points	Info Only	Info Only

Evaluator Notes:
The IUB was not assigned any interstate facilities inspections in CY2019.

3	If inspections were conducted independent of a PHMSA team inspection was PHMSA immediately notified of conditions which may pose an immediate safety hazard to the public or environment? Info Only = No Points	Info Only	Info Only

Evaluator Notes:
The IUB was not assigned any interstate facilities inspections in CY2019.

4	If inspections were conducted independent of a PHMSA team inspection did the state coordinate with PHMSA if inspections not were not included in the PHMSA Inspection Work Plan? Info Only = No Points	Info Only	Info Only

Evaluator Notes:
The IUB was not assigned any interstate facilities inspections in CY2019.

5	Did the state take direction from and cooperate with PHMSA for all incident investigations conducted on interstate pipelines? Info Only = No Points	Info Only	Info Only

Evaluator Notes:
The IUB was not assigned any interstate facilities inspections in CY2019.

6	General Comments: Info Only = No Points	Info Only	Info Only

Evaluator Notes:
The IUB was not assigned any interstate facilities inspections in CY2019.

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