



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

1200 New Jersey Avenue SE
Washington DC 20590

2019 Hazardous Liquid State Program Evaluation

for

INDIANA UTILITY REGULATORY COMMISSION

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 Hazardous Liquid State Program Evaluation -- CY 2019
Hazardous Liquid

State Agency: Indiana

Agency Status:

Date of Visit: 05/11/2020 - 05/13/2020

Agency Representative: William Boyd

PHMSA Representative: Clint Stephens

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

Name/Title: Mr. Jim Huston, Chairman

Agency: Indiana Utility Regulatory Commission

Address: 101 West Washington Street, Suite 1500E

City/State/Zip: Indianapolis, Indiana 46204

Rating:

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

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
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

0
15
10
50
15
4
0

0
15
10
50
15
4
0

TOTALS

94 94

State Rating **100.0**

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. Stats on Operator Data seems accurate for Attachment 1 of the Progress Report.
- b. Reviewed Inspection Activity Data in IURC CRM database which seems accurate in Attachment 2 of Progress Report.
- c. List of Operator data seems accurate in Attachment 3 of Progress Report.
- d. There were no incidents recorded for CountryMark in CY2019.
- e. There were no compliance actions for CountryMark in CY2019.
- f. List of records are kept mainly in the CRM database and backed up by the IT department for Attachment 6 in Progress Report.
- g. Staff and TQ Training Data is accurate in Attachment 7 of Progress Report.
- h. Compliance with Federal Regulations Data is accurate in Attachment 8 of Progress Report.
- i. Performance and Damage Prevention Questions data outlined planned and past performance metrics, along with nine elements of damage prevention program.

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 | 5 | 5 |
| | <ul style="list-style-type: none">a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspectionsb. IMP Inspections (reviewing largest operator(s) plans annually)c. OQ Inspectionsd. Damage Prevention Inspectionse. On-Site Operator Trainingf. Construction Inspections (annual efforts) | | |

Evaluator Notes:

In order to prepare for an inspection (pre-inspection), the inspector must follow procedures outlined in page 30 ? Inspection Preparation of the PSD Program Manual. The inspection procedures are outlined in pages 31 ? 50. The post-inspection procedures are outlined in Part VI ? Inspection Form and Violation Processing, pages 50 -52.

- | | | | |
|---|---|---|---|
| 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 | 4 | 4 |
| | <ul style="list-style-type: none">a. Length of time since last inspectionb. 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? | | |

Evaluator Notes:

Inspection priorities of each operator is outlined in procedures ? "Data-Driven Risk Model and subsequent Inspection Plan, pages 18 ? 26.

- | | | | |
|---|---|---|---|
| 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
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
| | <ul style="list-style-type: none">a. Procedures to notify an operator (company officer) when a noncompliance is identifiedb. Procedures to routinely review progress of compliance actions to prevent delays or breakdownsc. Procedures regarding closing outstanding probable violations | | |

Evaluator Notes:

The procedures to identify steps to be taken from discovery to resolution of probable violation is included in Part VI ? Inspection Form and violation Processing, pages 50 ? 52 of the PSD Program Manual.

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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?
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
| | <ul style="list-style-type: none">a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reportsb. 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:

Written procedures for incident ? accidents is included in Part IX ? Investigation of Incidents, pages 75 -83 of the PSD Program Manual.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues identified in Part B - Program Inspection Procedures during the evaluation.

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 | 5 | 5 |
| | <ul style="list-style-type: none">a. Completion of Required OQ Training before conducting inspection as leadb. Completion of Required IMP Training before conducting inspection as leadc. Root Cause Training by at least one inspector/program managerd. Note any outside training completede. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1) | | |

Evaluator Notes:

Chuck Weindorf, Rich Medcalf, and Bill Boyd are only inspectors qualified to lead HL inspections and have completed all the required TQ training.

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| 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:

State Pipeline Safety Program Manager indicated adequate knowledge of PHMSA program and regulations.

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| 3 | General Comments:
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

There were no issues identified in Part C - State Qualifications during the evaluation.

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



PART D - Program Performance

Points(MAX) Score

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|---|--|---|---|
| 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 | 5 | 5 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Construction (did state achieve 20% of total inspection person-days?)f. OQ (see Question 3 for additional requirements)g. IMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Reviewed the inspection records for CountryMark Refining and Logistics, LLC (IMP, OQ, O&M, CRM, PA) which the IMP inspection did not meet the 5 year interval, but was included in the CY2018 evaluation. The IURC completed 20% construction inspections in 2019.

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|---|---|----|----|
| 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 | 10 | 10 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Constructionf. OQ (see Question 3 for additional requirements)g. IMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Reviewed the inspection records for CountryMark Refining and Logistics, LLC (IMP Assessment & Repair 2019)(OQ 2019) which forms covered all applicable code requirements addressed on the Federal inspection forms.

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

Evaluator Notes:

Reviewed the inspection records for CountryMark Refining and Logistics, LLC OQ 2019 Program and the IURC found the program to be up to date.

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| 4 | Is state verifying operator's integrity management Programs (IMP)? 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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| | <ul style="list-style-type: none">a. Are the state's largest operator(s) plans being reviewed annually? | | |

Evaluator Notes:

Reviewed IMP inspection records for CountryMark which was inspected in 2019 that included a review of their plan, along with monitoring progress of assessments and verifying digs. The IMP program was found to be up to date and progress of the program is being monitored. The IURC meets with larger operators on annual basis to discuss any possible integrity assessment issues that are being evaluated for repair or replacement.

- 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 records of previous accidents and failures including reported third-party damage and leak response to ensure appropriate operator response as required by 192.617; and
 - b. 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;

Evaluator Notes:

Form 3 ? Standards Liquids inspection form is used by the IURC which includes information for operators concerning NTSB recommendations.

- 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:

Form 3 ? Standards Liquids inspection form is used by the IURC which includes information for operators concerning ADBs.

- 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:

Reviewed the inspection records for CountryMark Refining and Logistics, LLC (IMP Assessment & Repair 2019)(OQ 2019) found that inspections were sent to company officials; probable violations documented properly; resolved probable violations; reviewed progress of probable violations; and compliance action was issued for each probable violation discovered.

- 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:

There were no reportable incidents for the HL program in 2019. The IURC did not have the opportunity to assist AID in 2019. Lessons learned are shared during the NAPSRS Region Meeting state of State address.

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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
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Chair letter sent 6/17/19, response received 8/7/19. No issue.

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

The IURC had its last pipeline safety seminar in 2018.

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

The IURC is capturing NPMS submittals by reviewing annual reports.

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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).
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

The IURC post the State Pipeline Safety Standards on the website, and enforcement cases that are docketed will be on the website for the public.

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| 13 | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

There are no open SRCRs for the HL program.

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| 14 | Was the State responsive to:
Yes = 1 No = 0 Needs Improvement = .5 <ul style="list-style-type: none"> a. Surveys or information requests from NAPSRS or PHMSA; b. Operator IM notifications; and c. PHMSA Work Management system tasks? | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

There were 17 surveys sent out to NAPSRS and the IURC responded to 8. There were no IM notifications to the IURC in 2019. The IURC has been working within WMS tasks with no issues.

- 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:

The IURC has not issued any waivers/special permits for any operators as of 2019.

- 16** Were pipeline program files well-organized and accessible? Info Only Info Only
Info Only = No Points

Evaluator Notes:

Yes. The IURC has most of their files stored in the CRM database which has been very useful during out virtual program evaluation. Files have been well-organized and accessible.

- 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 IURC has HL ? Attachment 2 (30); SICT (16) with no issue for 2019. The IURC stated there should be no problem meeting and/or exceeding SICT numbers for 2020.

- 18** Discussion on State Program Performance Metrics found on Stakeholder Communication Info Only Info Only
site.\ <http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805>
Info Only = No Points

Evaluator Notes:

Discussed performance metrics with IURC stating Inspector Qualification ? HL inspector qualification has decreased significantly from 2018 to 2019 as a negative trend. The IURC lost one employee in 2019 that was qualified to lead HL inspections.

- 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 Info Only
Info Only = No Points

- a. <https://pipelinesms.org/>
b. Reference AGA recommendation to members May 20, 2019

Evaluator Notes:

The IURC did a presentation on PSMS at its 2018 State Pipeline Safety Seminar. The IURC met with representatives from NPSCO and CenterPoint in its office in 2020 to further discuss PSMS. There have been quarterly meetings with NIPSCO and Vectren to discuss PSMS systems in 2019.

- 20** General Comments: Info Only Info Only
Info Only = No Points

Evaluator Notes:

There were no issues identified in Part D - Program Performance during the evaluation.

Total points scored for this section: 50
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 Info Only
Info Only = No Points
- What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc)
 - When was the unit inspected last?
 - Was pipeline operator or representative present during inspection?
 - Effort should be made to observe newest state inspector with least experience

Evaluator Notes:

Due to Covid 19 - Field portion waived

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

Evaluator Notes:

Due to Covid 19 - Field portion waived

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

Evaluator Notes:

Due to Covid 19 - Field portion waived

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

Evaluator Notes:

Due to Covid 19 - Field portion waived

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

Evaluator Notes:

Due to Covid 19 - Field portion waived

- 6 Was inspection performed in a safe, positive, and constructive manner ? Info Only Info Only
Info Only = No Points
- No unsafe acts should be performed during inspection by the state inspector
 - What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)
 - Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)
 - Other

Evaluator Notes:
Due to Covid 19 - Field portion waived

7 General Comments:
Info Only = No Points

Info Only Info Only

Evaluator Notes:
Due to Covid 19 - Field portion waived

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**

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|----------|--|---|---|
| 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:

Yes. The IURC has prepared an excel spreadsheet which analyzes data from annual reports to establish risk rankings. This data includes corrosion leaks, excavation damage per 1,000 locates, age of system, OQ Program, historical, operations, leaks repaired/eliminate during year, etc. Analyzing data for accuracy and trends such as decrease in bare and cast-iron pipe per year. The IURC does not have many incidents/accidents, but those few are investigated for root cause analysis. The IURC is utilizing PDM to verify incidents/accidents are included in Progress Report and annual reports are available from previous years.

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| 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 IURC investigates excavation damage incidents for UPPAC ? Underground Plant Protection Advisory Committee and has collected in civil penalties for NIPSO and Vectran from 2017- 2019 in the amount of \$2,401,000. These incidents are based on the State Damage Prevention Laws. The UPPAC committee verifies operators have identified excavators that have repeatedly violated one-call laws (IC 8-1-26). The first incident is a "Warning Letter"; second incident requires "Re-Training"; and the third incident is a civil penalty.

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|----------|---|---|----|
| 3 | Has the state reviewed the operator's annual report pertaining to Part D ? Excavation Damage?
Yes = 4 No = 0 Needs Improvement = 1-3 <ol style="list-style-type: none">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 IURC has quarterly excavation damage meetings with NIPSCO and Vectren to discuss root cause of damages and to evaluate that data. During these quarterly meetings, the operators categorize in detail "One-Call Notification Practices Not Sufficient" and "Locating Practices Not Sufficient". However, there has been no review of annual report information on excavation damages for the other jurisdictional operators.

- | | | | |
|----------|---|---|---|
| 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 <ol style="list-style-type: none">a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public. | 2 | 2 |
|----------|---|---|---|

- 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.
- 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 IURC has been analyzing the data from annual reports based on excavation damage per 1,000 tickets. The States damages per 1,000 tickets has been steadily decreasing from 2010 to 2019; whereas, the number of tickets has increases each year. Data has been analyzed for determining stakeholder group that are causing highest number of damages. Most of the damages are caused by excavation damage based on data. The UPPAC Committee has been involved with requiring excavators to be trained and re-trained when excavation damages occur, as an alternative to civil penalties. During the investigation process a root cause is determined to substantiate the reason for the excavation damage. This information is documented in the excavation investigation form ? "Damage Information Report ? Pipeline Safety Division". The form is filled out by operator and sent into to the Pipeline Safety Office. This information is documented in the excavation investigation form ? "Damage Information Report ? Pipeline Safety Division". The form is filled out by operator and sent into to the Pipeline Safety Office. The IURC showed information from their quarterly meetings with NPSCO and Vectren that they are appropriately focusing damage prevention education and training to address the causes of excavation damage. Baker Utility Partners conducts all training for the UPPAC committee to all the excavators in the State of Indiana. Also, majority of damage prevention civil penalties collected goes into education and training of excavators.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There was one issue identified in Part F - Damage Prevention & Annual Analysis during the evaluation. The IURC has quarterly excavation damage meetings with NIPSCO and Vectren to discuss root cause of damages and to evaluate that data. During these quarterly meetings, the operators categorize in detail "One-Call Notification Practices Not Sufficient" and "Locating Practices Not Sufficient". However, there has been no review of annual report information on excavation damages for the other jurisdictional operators.

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 Info Only
Info Only = No Points

Evaluator Notes:

Indiana is not an interstate agent.

- 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 Info Only
Info Only = No Points

Evaluator Notes:

Indiana is not an interstate agent.

- 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 Info Only
Info Only = No Points

Evaluator Notes:

Indiana is not an interstate agent.

- 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 Info Only
Info Only = No Points

Evaluator Notes:

Indiana is not an interstate agent.

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

Evaluator Notes:

Indiana is not an interstate agent.

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

Evaluator Notes:

Indiana is not an interstate agent.

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