



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

MICHIGAN PUBLIC SERVICE 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 Gas State Program Evaluation -- CY 2019

Gas

**State Agency:** Michigan

**Agency Status:**

**Date of Visit:** 09/28/2020 - 10/21/2020

**Agency Representative:** David Chislea

**PHMSA Representative:** Michael Thompson

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

**Name/Title:** Mr. Dan Scripps, Chairman

**Agency:** Michigan Public Service Commission

**Address:** 7109 West Saginaw Highway

**City/State/Zip:** Lansing, Michigan 48917

**Rating:**

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

**Interstate Agent:** Yes

## 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	0
15	15
10	10
50	43
15	15
4	4
0	0

### TOTALS

**94 87**

**State Rating** ..... **92.6**

## 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:

Review of state documents and records showed no issues at time of inspection.

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<br>Yes = 5 No = 0 Needs Improvement = 1-4   | 5 | 5 |
|   | <ul style="list-style-type: none"><li>a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspections</li><li>b. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually)</li><li>c. OQ Inspections</li><li>d. Damage Prevention Inspections</li><li>e. On-Site Operator Training</li><li>f. Construction Inspections (annual efforts)</li><li>g. LNG Inspections</li></ul> |   |   |

### Evaluator Notes:

For all inspections:

- Pre-Inspection Activities can be found in Section 2.10.
- Inspection activities are in Section 2.11 (beginning)
- Post Inspection Activities can be found in Sections 2.16 & 2.17

For each specific inspection type:

- a) For Standard Inspections - Standard Inspections are ongoing annual inspections. Guidance can be found in Section 2.11
- b) TIMP & DIMP - TIMP/DIMP Information can be found in Section 2.11a. TIMP
- c) OQ Inspections - OQ Inspection Information can be found in Section 2.11
- d) Damage Prevention Inspections - Damage Prevention Inspection Information can be found in Section 2.11

- |   |   |   |   |
|---|---|---|---|
| 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<br>Yes = 4 No = 0 Needs Improvement = 1-3  | 4 | 4 |
|   | <ul style="list-style-type: none"><li>a. Length of time since last inspection</li><li>b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)</li><li>c. Type of activity being undertaken by operators (i.e. construction)</li><li>d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.)</li><li>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)</li><li>f. Are inspection units broken down appropriately?</li></ul> |   |   |

### Evaluator Notes:

Section 3.1 discusses this process.

? Length of time since last inspection - Section 3.1

? Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) - Section 3.1

? Type of activity being undertaken by operators (i.e. construction) - Section 3.1

? Locations of operator's inspection units being inspected &#8208; (HCA's, Geographic area, Population Centers, etc.) - Section 3.1

? Process to identify high&#8208;risk inspection units that includes all threats &#8208; (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors) - Section 3.1

? Are inspection units broken down appropriately? See Risk Based Inspection Documentation. Also refer to Inspection Unit Risk Analysis documentation.

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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<br>Yes = 3 No = 0 Needs Improvement = 1-2                                      | 3 | 3 |
|   | <ul style="list-style-type: none"><li>a. Procedures to notify an operator (company officer) when a noncompliance is identified</li><li>b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns</li></ul> |   |   |

- c. Procedures regarding closing outstanding probable violations

Evaluator Notes:

? Procedures to notify an operator (company officer) when a noncompliance is identified - Section 5.3 (Written NC Letter) of the PG. Also, Sections 2.16 (Exit Summary - 30-day briefing) and 2.17 (Post-Inspection ? 90-day Notification)  
? Procedures to routinely review progress of compliance actions to prevent delays or breakdowns Section 5.9 (Follow-up) and Section 5.5 (resolution of NC) of the PG.  
? Procedures regarding closing outstanding probable violations Section 5.5 (Resolution of NC) and Section 5.10 (Verification).

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- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident?<br>Yes = 3 No = 0 Needs Improvement = 1-2<br>a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports<br>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. | 3 | 3 |
|----------|---|---|---|

Evaluator Notes:

See Sections 6 and 7 of the PG

? Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports ?  
Receiving calls ?  
? (New 2020)  
? See Section 6.6 (Staff Expectations) of the PG  
? Manager on-Call under development.  
- Records of notifications ? See Section 6.5 (Internal Notification) of the PG.  
- MOU between PHMSA and NTSB is reference in the PG (Appendix K)  
- Cooperation ? See Section 7.3 (failure Investigation Categories).  
? 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.  
Procedurally addressed in Section 7.4

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| <b>5</b> | General Comments:<br>Info Only = No Points | Info Only Info Only |
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Evaluator Notes:

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

## PART C - State Qualifications

Points(MAX) Score

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|---|---|---|---|
| 1 | Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.4<br>Yes = 5 No = 0 Needs Improvement = 1-4  | 5 | 5 |
|   | <ul style="list-style-type: none"><li>a. Completion of Required OQ Training before conducting inspection as lead</li><li>b. Completion of Required DIMP/IMP Training before conducting inspection as lead</li><li>c. Completion of Required LNG Training before conducting inspection as lead</li><li>d. Root Cause Training by at least one inspector/program manager</li><li>e. Note any outside training completed</li><li>f. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1)</li></ul> |   |   |

Evaluator Notes:

MPSC does track PHMSA TQ training for each inspector for qualification. However, they have an in-house training process in their procedures that allows them to do training of new inspectors and get them out on their own. This process needs to be better documented for the steps taken to qualify each inspector for each type of inspection conducted. It also needs to have a formal approval process that includes the actual sign off responsibility and authority. The line supervisors can sign off on completion of training steps made by the state, but only the Program Manager is allowed to say the inspector is qualified to do the work.

This is an area to be reviewed at the next evaluation.....

- |   |  |   |   |
|---|--|---|---|
| 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<br>Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|---|--|---|---|

Evaluator Notes:

Yes, the Program Manager, (David Chislea) has been with the MPSC for many years and showed he has a good knowledge of the PHMSA program and regulations.

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|---|--|-----------|-----------|
| 3 | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

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<br>Yes = 5 No = 0 Needs Improvement = 1-4  | 5 | 0 |
|   | <ul style="list-style-type: none"><li>a. Standard (General Code Compliance)</li><li>b. Public Awareness Effectiveness Reviews</li><li>c. Drug and Alcohol</li><li>d. Control Room Management</li><li>e. Part 193 LNG Inspections</li><li>f. Construction (did state achieve 20% of total inspection person-days?)</li><li>g. OQ (see Question 3 for additional requirements)</li><li>h. IMP/DIMP (see Question 4 for additional requirements)</li></ul> |   |   |

### Evaluator Notes:

a. Standard inspections conducted in a rotating schedule that covers all portions of the code over a four year period. This is very hard to track and verify when a complete Standard-Comprehensive inspection is completed. The state needs to designate a start and stop period for a complete standard inspection so it can be tracked.  
Full Drug and Alcohol inspections using the PHMSA form 3.1.11 have not been conducted since 2000. The program has now scheduled them to take place in 2020 - 2024.

D1. The MPSC has not conducted all types of inspections for all operator inspection units in accordance with time intervals established in their written procedures. A loss of 5 points

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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?<br>Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
|   | <ul style="list-style-type: none"><li>a. Standard (General Code Compliance)</li><li>b. Public Awareness Effectiveness Reviews</li><li>c. Drug and Alcohol</li><li>d. Control Room Management</li><li>e. Part 193 LNG Inspections</li><li>f. Construction</li><li>g. OQ (see Question 3 for additional requirements)</li><li>h. IMP/DIMP (see Question 4 for additional requirements)</li></ul>  |    |    |

### Evaluator Notes:

A review of the inspections and forms showed that the forms used by the MPSC covered all applicable code requirements addressed on federal inspection forms. The form and process used covers all CFR regulations.

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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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 1 |
|---|---|---|---|

### Evaluator Notes:

D3 - A review of OQ inspections showed that the MPSC is not always verifying that operator personnel, (including contractors) that are performing covered tasks are properly qualified and requalified at the intervals indicated in the operator's plan while conducting field inspections. A loss of One point

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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:

Yes, TIMP (HDQ) Inspections were completed in 2014/2015/2016. TIMP for Large Operators ("Big 4") was in 2014 and occurred again 2018. Smaller operators TIMP Inspections occurred in 2019. The MPSC is also receiving ILI updates from DTE and CE to facilitate annual field inspections. Annual communication meetings and presentations on TIMP and DIMP topics are taking place with the "big 4."

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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. Yes. Verified during Cycle 'A,' inspected in First Half 2017 and due in First Half 2021.
- b. Yes. Verified during Cycle 'A,' inspected in First Half 2017 and due in First Half 2021.
- c. Yes. Verified during Cycle 'H,' last inspected in Second Half 2016. Currently being verified in 2020.
- d. Yes. Verified during Cycle 'A,' in First Half 2013 and in First Half 2018 (Cycle 'C').
- e. Yes. Verified during Cycle 'H,' last inspected in Second Half 2016. Planned next for 2020.
- f. Yes. Verified during Cycle 'H,' last inspected in Second Half 2016. Planned next for 2020.

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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:

Uses questions on inspection forms to verify.

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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 | 9 |
|---|--|----|---|

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:

D7 - The MPSC has not documented the routine review of progress on probable violations from past inspections causing a breakdown in the process and extending the time to ensure compliance has been met by the operator. A loss of One point

<b>8</b>	(Incident Investigations) Were all incidents investigated, thoroughly documented, with conclusions and recommendations? Yes = 10 No = 0 Needs Improvement = 1-9	10	10
	<ul style="list-style-type: none"> <li>a. Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports?</li> <li>b. Did state keep adequate records of Incident/Accident notifications received?</li> <li>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?</li> <li>d. Were onsite observations documented?</li> <li>e. Were contributing factors documented?</li> <li>f. Were recommendations to prevent recurrences, where appropriate, documented?</li> <li>g. Did state initiate compliance action for any violations found during any incident/accident investigation?</li> <li>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?</li> <li>i. Does state share any lessons learned from incidents/accidents?</li> </ul>		

Evaluator Notes:

- a. (New 2020) ? On Call System: Section 6.6 (Staff Expectations) of the PG
- b. Section 6.5 (Internal Notification) of the PG. All calls are recorded in the database system (section 6.3).
- c. Section 7.4.
- d. Section 7.4 (Incident Investigation Procedures) & Section 7.8 (Reporting)
- e. Section 7.4 (Incident Investigation Procedures) & Section 7.8 (Reporting)
- f. Section 7.4 (Incident Investigation Procedures) & Section 7.8 (Reporting). MPSC DB for examples.
- g. Section 7.8.
- h. Yes. Staff provides monthly updates to PHMSA.
- I. Yes, state does share at NAPS Region meetings

<b>9</b>	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:

2018 Evaluation Chairman's letter went out to the state on 6/25/2019 and the states response came back on 9/20/2019.

<b>10</b>	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:

Yes. 2019 (October 8 through October 10) and previously 2016.

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|-----------|--|-----------|-----------|
| <b>11</b> | Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission?<br>Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

Evaluator Notes:

Yes. Verified during Cycle 'D,' last inspected in Second Half 2014 and in Second Half 2018.

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| <b>12</b> | 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).<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

Yes. Michigan performs annual "communications meetings" with operators in the state. Information is also posted on the MPSC website.

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|-----------|---|---|---|
| <b>13</b> | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes. Staff provides monthly updates to PHMSA. There were 15 in 2019 with 1 carryover.

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| <b>14</b> | Was the State responsive to:<br>Yes = 1 No = 0 Needs Improvement = .5<br>a. Surveys or information requests from NAPSRS or PHMSA;<br>b. Operator IM notifications; and<br>c. PHMSA Work Management system tasks? | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

- a. Program Manager provided E-Mail Responses.
- b. Staff has an IMP SME (KRF) to handle IM notifications and inspections. Additionally, IM information is received annually from the larger operators in the state at communications meetings.
- c. Is working on this one.

- |           |  |   |   |
|-----------|--|---|---|
| <b>15</b> | 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.<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

MPSC has 5 waivers on the PHMSA list at this time with 4 that are no longer active. Provided contact name to PM to address.

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|-----------|---|-----------|-----------|
| <b>16</b> | Were pipeline program files well-organized and accessible?<br>Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

Evaluator Notes:

Yes, Documentation is stored primarily in the MPSC Gas Safety Database

- |           |   |   |   |
|-----------|---|---|---|
| <b>17</b> | Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT). Has the state updated SICT data?<br>Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
|-----------|---|---|---|

Evaluator Notes:

Discussed the SICT with the Program Manager and Supervisor Tim Wolf. They needed to do 861 days in 2019 and completed 957.

- 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 the state program metrics with the Program Manager and Supervisor Tim Wolf.

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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 Info Only  
Info Only = No Points  
a. <https://pipelinesms.org/>  
b. Reference AGA recommendation to members May 20, 2019

Evaluator Notes:

The MPSC is working to put a process in place to address this.

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

Evaluator Notes:

D1. The MPSC has not conducted all types of inspections for all operator inspection units in accordance with time intervals established in their written procedures. A loss of 5 points

D3 - A review of OQ inspections showed that the MPSC is not always verifying that operator personnel, (including contractors) that are performing covered tasks are properly qualified and requalified at the intervals indicated in the operator's plan while conducting field inspections. A loss of One point

D7 - The MPSC has not documented the routine review of progress on probable violations from past inspections causing a breakdown in the process and extending the time to ensure compliance has been meet by the operator. A loss of One point

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Total points scored for this section: 43  
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:

Observed Brian Gauthier conduct regulator station inspection on 10/20/20. Inspection is conducted annually. Pipeline operator and contractor present throughout inspection.

Observed Rob Gregg conduct construction inspections (10/21/20). Pipeline operator and contractor present throughout inspections.

- 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:

Completed inspection forms submitted.

- 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:

Inspectors reviewed all applicable procedures, records (OQ) and observed work being completed.

- 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:

Inspectors displayed adequate knowledge of regulations and program, noted recommendations and follow-up.

- 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:

Inspectors completed exit interview, noting recommendations and follow-up.

- 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)

- c. Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)
- d. Other

Evaluator Notes:

Day 1: Inspector observed regulator station maintenance, valve actuation, set points, etc. No issues observed.

Day 2: Inspector conducted construction inspections including 4" pe project and new pe service tie-in to 2" steel main. No issues observed.

7 General Comments:  
Info Only = No Points

Info Only Info Only

Evaluator Notes:

No issues observed.

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**

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues.<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

The MPSC has assigned an inspector the responsibility of doing this review.

- |          |  |   |    |
|----------|--|---|----|
| <b>2</b> | 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)<br>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)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | NA |
|----------|--|---|----|

Evaluator Notes:

- |          |   |   |    |
|----------|---|---|----|
| <b>3</b> | Has the state reviewed the operator's annual report pertaining to Part D ? Excavation Damage?<br>Yes = 4 No = 0 Needs Improvement = 1-3 <ol style="list-style-type: none"><li>a. Is the information complete and accurate with root cause numbers?</li><li>b. Has the state evaluated the causes for the damages listed under "One-Call Notification Practices Not Sufficient" (Part D.1.a.)?</li><li>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?</li><li>d. Is the operator or its locating contractor(s) qualified and following written procedures for locating and marking facilities?</li><li>e. Is the operator appropriately requalifying locators to address performance deficiencies?</li><li>f. What is the number of damages resulting from mismarks?</li><li>g. What is the number of damages resulting from not locating within time requirements (no-shows)?</li><li>h. Is the operator appropriately addressing discovered mapping errors resulting in excavation damages?</li><li>i. Are mapping corrections timely and according to written procedures?</li><li>j. Has the state evaluated the causes for the damages listed under "Excavation Practices Not Sufficient" (Part D.1.c.)?</li></ol> | 4 | NA |
|----------|---|---|----|

Evaluator Notes:

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | 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?<br>Yes = 2 No = 0 Needs Improvement = 1 <ol style="list-style-type: none"><li>a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.</li><li>b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages?</li><li>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.</li><li>d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?</li></ol> | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

The MPSC is working with operators to get this information and has added emphasis in 2019 for analysis.

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**5** General Comments:

Info Only = No Points

Info Only Info Only

Evaluator Notes:

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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:

Michigan documents all interstate inspections in IA, using IA generated question sets. Procedurally addressed in Section 4 of the PG.

- 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:

All documentation was submitted through IA. MPSC also documented 2019 interstate inspections in the following cases per the inspection plan:

- 1) Northern Natural Gas Integrated Inspection ? Case # 3078
- 2) DTE Gas (Vector) Integrated ? Case # 3296
- 3) Panhandle Eastern Integrated ? Case # 3086

- 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:

N/A. No immediate conditions were reported. However, this is required in Section 4.2 (3rd Bullet) of the MPSC PG

- 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:

No such inspections were conducted in 2019. All interstate activity were planned integrated inspections.

- 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:

No such inspections were performed in 2019.

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

Evaluator Notes:

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