



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

PUBLIC UTILITIES COMMISSION OF OHIO

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: Ohio

Agency Status:

Date of Visit: 09/28/2020 - 10/02/2020

Agency Representative: Joe Dragovich, Chief Gas Pipeline Safety Section
Pete Chace, Chief Facility Operations & Field Division
Thomas E. Stikeleather, Service Monitoring & Enforcement Department

PHMSA Representative: Glynn Blanton, State Evaluator

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

Name/Title: Sam Randazzo, Chairman
Agency: Public Utilities Commission of Ohio
Address: 180 East Broad Street
City/State/Zip: Columbus, OH 43215

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
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. Public Utilities Commission of Ohio (PUCO) is a 60105 & Interstate agency. Reviewed information in attachment 1 to Data Mart. PUCO inspected all inspection units for Municipal, master meter and LPG systems in CY2019. They have 118 operators and 177 inspection units.
- b. Number of inspections performed were 1,627 with 8% in construction. No damage prevention inspections and 11 drug & alcohol.
- c. Compared list to Data Mart and found two transmission companies GAS RECOVERY SYSTEMS, LLC & VERMILLION POWER not listed. Information will need to verify with Program Manager (PM). The PM list matches attachment 3.
- d. Six incidents occurred in CY2019. However, only five meet the criteria. Need PM to provide a summary of each incident, correct date of incidents and email to Carrie Winslow.
- e. Number of carryover continue to be high. All categories appear to be correct and one large penalty assessed and collected in CY2019.
- f. Detailed list of records appear to be complete. No issues.
- g. Performed an analysis of information in TQ Blackboard pertaining to PUCO staff inspectors. Three inspectors are category I, six category II and 1 category III. Two inspectors are Gas IM & nine are qualified gas inspectors. New PM has not completed failure investigation course PL3256. according to TQ records. He is scheduled to attend the course in November, 2020.
- h. PUCO has not adopted all federal regulations. A loss of 3 points occurred on Progress Report review. Legislation has not been filed in more than two years. They have civil penalty of \$100,000 to \$1 M. Legislation has been introduced to adopt regulations in 2021, Commission docket number 19-00047.
- i. Several items listed in performance section are a copy paste from last year's report. Improvement is needed in providing more information on performance and damage prevention questions.

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. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually)c. OQ Inspectionsd. Damage Prevention Inspectionse. On-Site Operator Trainingf. Construction Inspections (annual efforts)g. LNG Inspections | | |

Evaluator Notes:

- a. Yes, this item is located in 2019 Gas Pipeline Safety Inspection Plan State of Ohio on page 11 under "Conducting Inspections".
- b. Yes, TIMP & DIMP inspection procedures are located in 2019 Gas Pipeline Safety Inspection Plan State of Ohio on page 11.
- c. Yes, OQ inspection procedures are located in 2019 Gas Pipeline Safety Inspection Plan State of Ohio on page 11.
- d. Yes, damage prevention inspection procedures are contained in the standard inspection procedures located in 2019 Gas Pipeline Safety Inspection Plan State of Ohio on page 11.
- e. Yes, On-Site inspection procedures are located in 2019 Gas Pipeline Safety Inspection Plan State of Ohio on page 10.
- f. Yes, construction inspection procedures are located in 2019 Gas Pipeline Safety Inspection Plan State of Ohio on page 12.
- g. PUCO has safety jurisdiction over LNG but no facilities have been built. Agency may consider adding this inspection procedures in their plan in the future.
- h.

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

- a. to e
Yes, inspection priorities are located in 2019 Gas Pipeline Safety Inspection Plan State of Ohio on page 7. Additionally, Attachment 2 of their plan provides the risk factors.
- f. Yes, a review of list of operators and inspection units show the units are broken down correctly. No issues.

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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
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:

- a. Yes, this item is located in 2019 Gas Pipeline Safety Inspection Plan
State of Ohio on page 16, under sub-title: Notice of Probable Noncompliance.
- b. Yes, this item is located in 2019 Gas Pipeline Safety Inspection Plan
State of Ohio on page 16, under sub-title: Notice of Probable Noncompliance.
- c. Yes, this item is located in 2019 Gas Pipeline Safety Inspection Plan
State of Ohio on page 16, under sub-title: Notice of Probable Noncompliance.

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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 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. & b. Yes, this item is located in 2019 Gas Pipeline Safety Inspection Plan
State of Ohio on page 9, under sub-title: Scheduling Incident and Outage Investigations

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

Evaluator Notes:

No loss of points occurred in this section of the review.

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 |
| | 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) | | |

Evaluator Notes:

a. to f. Reviewed TQ Blackboard and found nine of the ten inspectors are Gas Standard Inspector qualified. Two inspectors are Gas IMP qualified and lead inspectors. PM has not completed PL-3256 Failure Investigation course to qualify as Gas Standard Inspector. Three inspectors have completed the root cause course.

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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:

Mr. Dragovich assumed the Program Manager (PM) position on November 14, 2019. He was previously with Ohio Environmental Protection Agency and PUCO as Gas Pipeline Safety Compliance Investigator. He is familiar with the pipeline safety regulations and according to TQ needs to complete PL 3256 course within five years of his appointment.

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

No loss of points occurred in this section of the review.

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. Part 193 LNG Inspectionsf. 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) | | |

Evaluator Notes:

Random generated operators to be checked for this evaluation period consisted of nine distribution systems including twenty-nine inspection units, seven transmission systems and four gathering line systems. A review of audit report provided by PM confirm all inspection units and operators were inspected in accordance to PUCO Plan on page 7, Time Intervals for Inspections.

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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. Part 193 LNG Inspectionsf. Constructiong. OQ (see Question 3 for additional requirements)h. IMP/DIMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Random selection of inspection reports consisted of 9 distribution, 7 transmission and 4 gathering systems. All inspection reports were reviewed using TEAMS to verify information. No issues were found on the forty-four inspection reports reviewed. Good documentation was observed on each inspection report.

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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:

Yes, PUCO uses the questions in IA for the Headquarter inspection and their Gas Distribution Inspection Report and Gas Transmission Inspection report form for the field OQ inspection.

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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
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?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, PUCO uses the Inspection Assistant for DIMP inspections. In 2019, fifteen DIMP inspections were performed on the random selected operators for this state program evaluation review.

Yes, Columbia Gas and Vectron DIMP plans were reviewed in Cy2019.

Yes, this item is listed in IA question set used for DIMP.

Yes, this is accomplished using the Low Pressure Gas System Survey Form.

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

- This item is located in PUCO Headquarter form on page 11. Section question 192.459.
- This item is located in PUCO Headquarter form page 14 question 192.613
- This item is located in PUCO Headquarter form on page 24 question (192.615)
- This item is located in PUCO Headquarter form on page 14 question (192.617)
- This item is located in PUCO Headquarter form on page 23 question (192.614)
- This item is located in the LP system survey document.
- This item is located in the PUCO Headquarters' inspection form.

6	Did the State verify Operators took appropriate action regarding advisory bulletins issued since the last evaluation? (Advisory Bulletins Current Year) Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

No advisory bulletins were issued in CY2019 therefore this item was not reviewed with the operator. In the past this item was located in the PUCO Headquarters' Inspection form.

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 Yes = 10 No = 0 Needs Improvement = 1-9	10	10
	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. Reviewed 22 compliance letters sent to operators in CY2019. All information was complete with non-compliance items listed and no areas of concern were noted.
- b. Yes, probable violations were listed in reports and well documented.
- c. Yes, non-compliance issues were resolved by the operator taking corrective action to clear the violation or submitting a plan of action.
- d. Yes, PM and inspectors routinely review violations prior to conducting the next inspection.
- e. Yes, twenty-two compliance letters were issued in CY2019.
- f. Yes, civil penalty of \$400,000 was assessed and collected on Columbia Gas of Ohio.
- g. Yes, a review of compliance letters found PM approves and signs all documents.
- h. Yes, due process is provided in compliance letter sent to operator.
- i. An exit interview is conducted with the operator after the inspection. This item is listed on each inspection report.
- j. Areas of non-compliance are reviewed with the operator during the exit interview and letter provided within 90 days after the inspection.

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

- a. Yes. PUCO written procedures on pages 9, 13 and 14 and checklist listed in Attachment 4 address these items.
- b. Yes, a review of PUCO data base confirm records of incidents/accidents notification were well maintained.
- c. Yes. If a decision by PUCO to not go on-site to investigate an incident, that information is documented on the "Telephonic Notice of Incidents and Service Failures" form and stored in the PUCO database.
- d to f. Yes, a review of the five reportable incidents were conducted using TEAMS. Each investigation report was reviewed and found with detailed information on findings of facts and other relative information on each incident.
- g. Yes, compliance action was taken on four of the five incidents as listed in the investigation reports. The Dominion Energy incident that occurred on 11-15-2019 resulted in a fine of \$1 million being assessed and collected in CY2020.
- h. Yes, response from Brian E. Pierzina, P.E. Sr. Accident Investigator, Accident Investigation Division indicate they did response to requested information.

i. Information on incidents and accidents are shared during Eastern Region conference calls and NAPSRS Meetings.

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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:

No response was required from letter send to Chairman Sam Randazzon on September 13, 2019 due to a perfect score.

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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:

Yes, the last seminar held was in CY2018. OPUC was scheduled to host a PHMSA TQ seminar on May 21-22, 2020 but due to COVID-19 was rescheduled. The seminar will be online and scheduled for October 29-30, 2020.

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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:

Yes. This item is located on page 2 in the PUCO Construction, Operations and Maintenance Plans and Procedures Review form (Headquarters Form).

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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:

This is accomplished via the Ohio Gas Association meetings, PUCO website and informative meetings with the operators.

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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:

Yes, one safety related condition report was found for Vectren Energy of Ohio on 10-21-2019. PUCO provided informaiton into the WMS portal and conducted a site visit with the operator. information on the inspection was provided by PUCO.

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

Information received from Robert Clarillos, NAPSRS Administrative Manger, indicated Pete Chace (or Joe Dragovich) responded to 12 of the 17 surveys in 2019.

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

The waiver submitted by National Gas & CO-OP in 2017 and approved by the PUCO in 2018 is still open.

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| 16 | Were pipeline program files well-organized and accessible?
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

Based on discussion with PM and review of attachment 6 confirm files were well organized.

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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?
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
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Evaluator Notes:

CY2020 number is 1349. CY2019 was 1390. PM has a good understanding of the process and has completed the CY2021 program.

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| 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 | | |
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Evaluator Notes:

A review of metrics show upward trend in excavation damages per 1,000 locate tickets from CY2018 of 2.5 to CY2019 of 2.7. An upward trend in leak management has occurred from CY2018 to CY2019 in leaks scheduled to be repaired from 80 to 84. Inspection activity days has increased from previous CY2018.

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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
a. https://pipelinesms.org/
b. Reference AGA recommendation to members May 20, 2019 | Info Only Info Only | |
|-----------|--|---------------------|--|

Evaluator Notes:

Yes, this is accomplished by three methods. 1 Training meetings with the operator and discussion about implementation of PSMS.; 2. The use of PUCO Headquarter's form . and 3. PUCO Enforcement program letters requiring the operator to participate in PSMS and provided updates to the agency.

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| 20 | General Comments:
Info Only = No Points | Info Only Info Only | |
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Evaluator Notes:

No loss of points occurred in this section of 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:

Annmarie Robertson observed David Price, Gas Pipeline Safety Compliance Investigator for PUCO conduct field inspections of Ohio Gas Company on September 22, 2020. The unit was last inspected in 2019. Observed odorization, valve inspections, regulator inspections, atmospheric corrosion, rectifier readings and pipe-to-soil potentials throughout the Bryan, Ohio area. Several representatives of the pipeline operator were present throughout the inspections, as well as the Pipeline Safety Program Manager.

- 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:

State of Ohio inspection forms were used.

- 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:

Observed field activities. No issues.

- 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:

Inspector displayed adequate knowledge of program and regulations. No issues.

- 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:

Inspector reviewed observations with operator. Full exit interview will be conducted upon completion of inspection.

- 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:

Inspections included pipe-to-soil readings, atmospheric corrosion, rectifier readings, and inspections, valve inspections, odorization, regulator station inspections. For all sites, inspector asked about AOCs. Inspector displayed strong knowledge of the system and applicable regulations.

7 General Comments:
Info Only = No Points

Info Only Info Only

Evaluator Notes:

No issues.

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, PUCO annually prepares several spreadsheets on data located in the annual report and shares the information with staff members. The data is used in their rank risking.

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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:

This item is addressed in PUCO Headquarter inspection form section 192.617 on page 14. N/A for 2019 Evaluation

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

New and also N/A for 2019

a. Yes

b. Yes, root causes for damages are posted on the PUCO spreadsheets developed annually by a staff member.

c to j. Yes. These items are addressed in PUCO Headquarter inspection form in the section entitled, "PHMSA Areas of Emphasis", on page 14.

- | | | | |
|----------|--|---|---|
| 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.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:

Yes, PUCO annually prepares several spreadsheets on data located in the annual report and shares the information with staff members. The data is used in their rank risking.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section of the review.

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:

Yes, response from PHMSA Eastern Region stated, "Yes, all inspections were conducted using IA, all planned questions were answered and required forms/documents were completed"

- 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:

Yes, response from PHMSA Eastern Region stated, "Yes, all inspections were conducted using IA, all planned questions were answered and required forms/documents were completed"

- 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:

Yes, response from PHMSA Eastern Region stated, "Yes, all inspections were conducted using IA, all planned questions were answered and required forms/documents were completed"

- 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:

Yes, response from PHMSA Eastern Region stated, "No additional inspections were performed that were not specifically identified in the 2019 Inspection Plan."

- 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:

Yes, failure investigations were conducted by OH and coordinated with PHMSA

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

Evaluator Notes:

No loss of points occurred in this section of the review.

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