



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

1200 New Jersey Avenue SE
Washington DC 20590

2020 Gas State Program Evaluation

for

IOWA UTILITIES BOARD

Document Legend

PART:

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



2020 Gas State Program Evaluation -- CY 2020

Gas

State Agency: Iowa

Agency Status:

Date of Visit: 09/28/2020 - 09/30/2020

Agency Representative: Magid Yousif

PHMSA Representative: Joe Subsits

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

Name/Title: Geri Huser, Chair

Agency: Iowa Utilities Board

Address: 1375 E. Court Ave

City/State/Zip: Des Moines, Iowa 50319

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 2020 (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

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

Possible Points Points Scored

0	0
15	15
10	10
50	50
15	15
10	10
0	0
100	100

TOTALS

State Rating **100.0**

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- 1 Were the following Progress Report Items accurate? (*items not scored on progress report) Info Only Info Only
Info Only = No Points
- Stats On Operators Data - Progress Report Attachment 1
 - State Inspection Activity Data - Progress Report Attachment 2
 - List of Operators Data - Progress Report Attachment 3*
 - Incidents/Accidents Data - Progress Report Attachment 4*
 - Stats of Compliance Actions Data - Progress Report Attachment 5*
 - List of Records Kept Data - Progress Report Attachment 6 *
 - Staff and TQ Training Data - Progress Report Attachment 7
 - Compliance with Federal Regulations Data - Progress Report Attachment 8
 - Performance and Damage Prevention Question Data - Progress Report Attachment 10*

Evaluator Notes:

Iowa uses Access data base to generate the progress report.

- The number of operators in the progress report correlates to Iowa Utilities Board (IUB) electronic data. No new operators were added.
- 385 total inspection days were identified in attachment 2. 85 days were construction and design days calculating to 22% construction inspection days. There were 418 SICT days. Magid attributed not meeting the inspection days to COVID issues.
- Unit information on attachment 3 matches attachment 1 and IUB electronic records with the exception of 51 municipal units listed on attachment 3. Attachment 1 lists 50 municipal units. Traer Municipal was added as an operator in 2020. This operator was formally listed as a privately owned unit. The actual number is 51 municipal units.
- There was one federally reportable intrastate incident. This was a third party damage incident on the Black Hills Energy system. There were also 4 Federally reportable interstate incidents. Iowa's data matches the Pipeline Data Mart.
- Compliance numbers on attachment 5 add up accurately. Probable violation information is generated from an access data base. 179 probable violations were corrected in 2020. A Probable Violation (PV) report is used to track probable violations. The person who identifies the probable violation is responsible for monitoring the violation unless the operators has be reassigned to another inspector. Then the person who is assigned to work with the operator becomes responsible for tracking their PIV's.
- Pipeline Safety is managed electronically. Magid was able to effectively navigate through the data management system.
- Attachment g was compared to T&Q records. Magid , Sanel Dan O'Conner and Dave McCann are the only inspectors who are qualified for the core training, IMP/DIMP, OQ and root cause trained. Magid, Dan and Dave are LNG training. Natasha Welsh and Dave McCann are core and IMP qualified. There are two new inspectors who are being developed.
- The last adoption was 7/1/2020. Iowa has adopted \$100,000/\$1,000,000 penalty amounts. Rule updates are done manually.
- Planned and past performance activities were identified by the State. Iowa worked on and made progress on all performance activities.

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:

Pre and post inspection procedures are found in section 5.3 and 5.5 Procedures for Gas Pipeline Safety Program.

a.) Standard records and field review is addressed in section 5.4.1. PA effectiveness is addressed in section 5.4.1. Drug and alcohol and PA inspection frequencies are addressed in section 4.2.4.

b.) TIMP and DIMP inspections are found in inspection 5.4.5 for TIMP and section 5.4.8 for DIMP inspections.

c.) OQ inspections are found in section 5.2.3

d.) Damage Prevention activities are found in section 5.4.5. Damage prevention is addressed during the standard inspection.

e.) Operator training is addressed in section 5.4.4. The procedure mentions the pipeline safety seminars and participation in one call.

f.) Construction inspections are found in section 5.4.2.

g.) LNG inspections are covered in section 5.4.7.

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|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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-e) Inspection priorities are addressed in section 4.2. Prioritization considers outstanding compliance issues, system and HCA mileage, length of time since the last inspection and operator type. Inspection frequencies are initially based on inspection deadlines and remaining inspection slots are filled based on risk assessment ranking. Ranking makes sense to staff.

f.) Inspection units are based on how the operator breaks its Districts up.

- | | | | |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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.) Procedures to notify the operator of probable violations are found in section 5.5.1. The operator is notified of probable

violations by exit interview and in writing. Letters are sent whether there are violations or not. Letters go to the chief executive.

b.) Procedures to cover compliance follow up activities are found in section 5.5.2. Open violations are tracked and listed on a probable violation list. This list is checked periodically. Violations remain on data base until they are cleared.

c.) Procedures to close probable violations are found in section 5.5.3. Probable violations require validation of compliance before closure. The manager confirms the engineers determination of compliance and updates the data base.

4	(Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident?	3	3
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Yes = 3 No = 0 Needs Improvement = 1-2

- a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports
- b. If onsite investigation was not made, do procedures require on-call staff to obtain sufficient information to determine the facts to support the decision not to go on-site.

Evaluator Notes:

a.) Incident notification is addressed in section 6. IUB is required to be notified by operators in the event of an incident. The state's role in an investigation is to determine cause and make recommendations to prevent reoccurrence.

b.) The State investigates all Federally reportable incidents. This includes intra and inter state lines. Active scenes are investigated immediately. Controlled situations may be investigated the following day. Death/injury incidents are investigated immediately. Magid gets incident information filtered to him and he collects incident information to ascertain the conditions of the incident. He will deploy the staff required to investigate the incident during off hours. All incoming calls are documented by the duty officer.

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

Evaluator Notes:

No issues found

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 DIMP/IMP Training before conducting inspection as leadc. Completion of Required LNG Training before conducting inspection as leadd. Root Cause Training by at least one inspector/program managere. Note any outside training completedf. 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.) OQ qualified inspectors are Magid Yousif, Sanel Lisinovic, Dan O'Conner and Dave McCann.
- b.) DIMP/TIMP qualified inspectors are Magid Yousif, Natasha Welsh, Sanel Lisinovic, Dan O'Conner, Darin Tolzin and Dave McCann
- c.) LNG trained inspectors are Magid Yousif, Dan O'Conner and Dave McCann.
- d.) Root cause trained personnel are Magid Yousif, Natasha Welsh, Sanel Lisinovic, Dan O'Conner and Dave McCann.
- e.) No outside training was noted.
- f.) Core trained inspectors are Magid Yousif, Natasha Welsh, Sanel Liisinovic, Dan O'Conner, Darin Tolzin and Dave McCann.

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

Magid has been the program manager for two years. He has been an inspector for five years and is a qualified inspector. No issues identified.

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

Evaluator Notes:

No issues identified

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



PART D - Program Performance**Points(MAX) Score**

- | | | | |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 1 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 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:

a-f) Inspection time intervals are tracked using an inspection interval spreadsheet. The spreadsheet lacks detailed programmatic inspection information for smaller operators. Magid stated that this form will be revised this year to address this gap. Programmatic OQ inspections and drug and Alcohol were not being performed in accordance with required frequencies, this was an issue during last years inspection. Numerous OQ programmatic inspections were conducted last year in response to the 2019 inspection finding. Numerous drug and Alcohol inspections were also conducted in 2021.

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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:

a-h) Inspection documentation for operators chosen randomly were reviewed. Inspection forms were filled completely. IA is used for most inspection work except crew inspections. Crew inspections are documented using a state construction form.

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|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 3 | Is state verifying monitoring (Protocol 9/Form15) of operators OQ programs? 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:

Not conducting programmatic OQ inspections was determined to be an issue during last years inspection. Numerous OQ inspections were conducted during the past year. The inspection frequency tracking form is expected to be revised this year to help manage inspection planning efforts. Qualified inspectors conducted the OQ inspections.

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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 to ensure they are completing the full cycle of the DIMP/IMP process? | | |

- b. Are states verifying with operators any plastic pipe and components that have shown a record of defects/leaks and mitigating those through DIMP plan?
- c. Are the states verifying operators are including low pressure distribution systems in their threat analysis?

Evaluator Notes:

- a.) Iowa conducted an annual meeting with the largest three operators in the state. IMP/DIMP plans were discussed during the meeting
- b.) The State performs DIMP inspections. Problematic pipe is addressed during DIMP inspections. This question was also addressed in former state forms.
- c.) Mid American Energy in Iowa City has low pressure systems that are scheduled to be eliminated. This is the only unit that has low pressure systems.

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
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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-b) No cast Iron in Iowa. Last cast iron was removed in 2015.
- c) This question was asked on the previous state form.
- d) This question is asked during standard inspection.
- e) This question was asked on the previous state form.
- f) Low pressure advisory bulletin was submitted on September 2021. Low pressure system in Iowa City is to be replaced. Survey was also submitted to operators. Survey are intended to seek information from operator to determine if the advisory bulletin is applicable to the operators.
- g) Indoor regulator advisory bulletin was submitted to operators in September 2021. Survey was also submitted to operators. Survey are intended to seek information from operator to determine if the advisory bulletin is applicable to the operators.

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

Evaluator Notes:

Iowa sends advisory bulletin and surveys to operators. Iowa expects survey responses. The survey is intended to provide information to the State of the applicability of the advisory bulletin to the operator.

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
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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:

Inspection reports and compliance documentation were reviewed for random operators

- a) Compliance letters are submitted to the chief executive officer for the operator
- b) Probable violations identified in the inspection checklist are listed in the operator's compliance letter
- c) Probable violation were either resolved or transposed on the probable violation tracking form.
- d) Probable violation tracking forms are checked periodically and are reviewed when a standard inspection is conducted.
- e) All probable violations identified were properly managed
- f) There is historical evidence of the State fining operators
- g) The program manager signs letters and signs off on probable violations and the approval of associated compliance actions
- h) Show cause hearings are part of states processes but were not performed during the previous year
- i) Exit interviews are normally conducted the last day of the inspection. Exit interview days did not exceed 1 week from the last day of the inspection.
- j) Iowa submitted most inspection results to the operator within 90 days. There a a review of OQ plans for multiple municipal operators who have the same OQ plan. The compliance letter for this review went out in 110 days. This took longer because State had to verify chief executive officers for several municipalities'. Operators were informed of probable violation at the time of the exit interview.

8	(Incident Investigations) Were all federally reportable 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) Magid is the IUB contact for incident notifications including after hour incidents. Incident reports are entered in an electronic filing system.
- b) IUB keeps adequate records of federally reportable incidents. There was one intrastate incident in 2020. This was a directional bore that resulted in a house explosion.

- c) An onsite investigation was made of this incident.
- d) Observations were documented in the investigation report.
- e) The incident was evaluated for causal information.
- f) The incident was determined to be the fault of the boring company.
- g) Third party enforcement is handled by the AG's office.
- h) Iowa is an interstate agent and investigates Federal incidents for PHMSA.
- i) Lessons learned are disseminated internally and during the NAPSR regional meeting.

9	Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1	1	1
	Yes = 1 No = 0 Needs Improvement = .5		

Evaluator Notes:

A letter went out to Ms Geri Huser on 10/2/2020. A response correcting the issues was submitted on 10/13/2020. There were two point deductions. There a was a point deduction for all inspections not being done with in the required time and programmatic OQ inspections were not performed. These issues were reviewed during the inspection and found to be corrected.

10	Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5	Info Only	Info Only
	Info Only = No Points		

Evaluator Notes:

The last seminar was in 2019. The next seminar is scheduled for 2022.

11	Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission?	Info Only	Info Only
	Info Only = No Points		

Evaluator Notes:

This issue is addressed during standard inspections

12	Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public).	1	1
	Yes = 1 No = 0 Needs Improvement = .5		

Evaluator Notes:

The primary method to communicate with stakeholders is the web page.

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

Evaluator Notes:

Northern Natural Gas had a line exposure. A SRC was filed on 4/15/2020. This interstate SRC was evaluated and entered into WMS.

14	Was the State responsive to:	1	1
	Yes = 1 No = 0 Needs Improvement = .5		
	a. Surveys or information requests from NAPSR or PHMSA; and		
	b. PHMSA Work Management system tasks?		

Evaluator Notes:

- a) Magid responds to NAPSR surveys
 - b) IM notifications are regularly monitored
 - c) WMS is updated as required
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15	If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate.	1	1
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

IUB had sent a letter to Alton and Mapleton to determine whether the 8/6/2013 waiver is still applicable. A response is due by 10/30/2021.

16 Were pipeline program files well-organized and accessible?

Info Only Info Only

Info Only = No Points

Evaluator Notes:

IUB's files are electronic. Magid was able to navigate through the system effectively.

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:

418 SICT days were calculated. There were 385 actual days. 385 days is 92% of the required SICT days. Magid believes the the shortfall was covid related. Iowa had 84 construction days which meets the 20% of SICT days requirement.

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

Info Only = No Points

Evaluator Notes:

Performance metrics were discussed. There was a slight decrease in damages per 1000 locates. The certification enforcement and investigation score was constant at 100%. Iowa lost 4 people so there was a decrease in core training and 5 year employee retention. There was a decrease in leaks and increase in repairs. Master meter and LPG days were sporadic. This is due to low number of operators. There are 2 LPG operators and no master meters.

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:

This will be a topic during the upcoming seminar. Also a letter was submitted in 9/1/21 inquiring about the operators commitment to SMS.

20 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues identified

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:

- A construction inspection was was constructed in Grimes, Iowa. This was construction of two new services.
- This was construction inspection of Black Hills Energy
- A Black Hills energy construction inspector and compliance specialist was on site for Black Hills Energy during the inspection.
- Dave McCann was the IUB inspector. He has been with Iowa for 7 years and spent 3 years with Kansas

- 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:

Dave uses a state form to document the inspection

- 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:

This was an construction inspection of two new services. Dave inspected the entire activity. He checked qualification records and calibration records.

- 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:

Dave was an experienced inspector . He knew what to inspect for the various construction activities. He asked good questions and made appropriate observations.

- 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:

Dave conducted an exit interview. There were no probable violations found.

- 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

- b. What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)
- c. Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)
- d. Other

Evaluator Notes:

- a) Dave wore the appropriate PPE and conducted the inspection in a safe manner. He stayed at safe distance from excavation equipment and did not get in the workers way.
- b) Dave observed ditching, boring, joining, backfilling, pressure testing, purging and specification review
- c) Black Hills is starting an internal construction inspection program of contractor work. The also GPS'd the newly installed service lines.
- d) no issues found with the operator or inspector

7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues found

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



PART F - Damage prevention and Annual report analysis**Points(MAX) Score**

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

Evaluator Notes:

Annual reports are reviewed and results are graphed by staff engineers. Inquiries are made when there are outliers or anomalies. All LDCs get inquiry letters on the annual report review.

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

Evaluator Notes:

Review of causal information and information request are addressed in the annual report inquiry letter. Damage prevention program inquiries are also made during the standard inspection.

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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 | 4 |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

Part D is reviewed during the annual report review. The operator is expected to provide detailed causal information. Practices not adequate is not considered an acceptable explanation of causal information.

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|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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.d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages? | 2 | 2 |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

5 General Comments:

Info Only = No Points

Info Only Info Only

Evaluator Notes:

No issues found

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



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:

Iowa use Inspection Assistant for documenting all inspections except state construction inspections. Only one interstate inspection was performed last year. This was a team control room management inspection.

- 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:

The only 2020 interstate inspection conducted in Iowa was a control room management team inspection.

- 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:

PHMSA would be notified if immediate safety hazards were found.

- 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:

The state communicates with PHMSA prior to working with interstate operators.

- 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:

The state gets direction from PHMSA and provides follow up.

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

Evaluator Notes:

No issues found

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