



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

1200 New Jersey Avenue SE
Washington DC 20590

2020 Hazardous Liquid State Program Evaluation

for

INDIANA UTILITY REGULATORY COMMISSION

Document Legend

PART:

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



2020 Hazardous Liquid State Program Evaluation -- CY 2020
Hazardous Liquid

State Agency: Indiana

Agency Status:

Date of Visit: 04/12/2021 - 04/16/2021

Agency Representative: Bill Boyd, Pipeline Safety Division Director
Dan Novak, Pipeline Safety Division Manager
Mike Neal, Pipeline Safety Engineer
Miranda Erich, Pipeline Safety Engineer
Mary Schneider, Data & Reporting Manager

PHMSA Representative: Glynn Blanton, US DOT/PHMSA State Evaluator

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

Name/Title: Jim Huston, Chairman
Agency: Indiana Utility Regulatory Commission
Address: 101 West Washington Street, Suite 1500E
City/State/Zip: Indianapolis, IN 46204

Rating:

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

INSTRUCTIONS:

Complete this evaluation in accordance with the Evaluator Guidance for conducting state pipeline safety program evaluations. The evaluation should generally reflect state program performance during CY 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		Possible Points	Points Scored
A	Progress Report and Program Documentation Review	0	0
B	Program Inspection Procedures	15	15
C	State Qualifications	10	10
D	Program Performance	50	50
E	Field Inspections	15	15
F	Damage prevention and Annual report analysis	6	6
G	Interstate Agent/Agreement States	0	0
TOTALS		96	96
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
- 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. Jurisdictional authority, number of operators and unit inspected were found correct and verified via PHMSA Portal.
- b. Number of inspection person days & construction days were met. Total inspection person days performed was 68.
- c. Verification of operator name & ID number match attachment 1 & 3. No issues.
- d. No incidents reported for CY2020. Information was checked in PHMSA Portal. No issues.
- e. Number of carryover violations is five. No compliance action or civil penalty was issued in CY2020.
- f. A review of list of records appears to be correct. Unable to verify due to working remotely.
- g. Reviewed TQ training records and verified 5 inspectors have attended classes. Inspector categories are as follows: 1-I, 2-II, 1-III.
- h. They have not adopted civil penalty amount of \$100,000 to \$1 Million. Current penalty amount is \$25,000 per day up to \$1 million for a series of violations. A loss of two point occurred on the progress report review.
- i. No issues with summary of planned and pass performance projects. Good description on meeting the nine elements of damage prevention was provided.

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



PART B - Program Inspection Procedures

Points(MAX) Score

- | | | | |
|---|---|---|---|
| 1 | Do written procedures address pre-inspection, inspection and post inspection activities for each of the following inspection types: Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none">a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspectionsb. IMP Inspectionsc. OQ Inspectionsd. Damage Prevention Inspectionse. On-Site Operator Trainingf. Construction Inspections (annual efforts) | | |

Evaluator Notes:

- a. This is listed in Indiana Utility Regulatory Commission (IURC) Pipeline Safety Program Manual (PSPM) Section B, Inspection Planning, pages 1-16.
- b. This is listed in Indiana Utility Regulatory Commission (IURC) Pipeline Safety Program Manual (PSPM) Section B, Inspection Planning, page 12.
- c. This is listed in Indiana Utility Regulatory Commission (IURC) Pipeline Safety Program Manual (PSPM) Section B, Inspection Planning, page 12.
- d. This is listed in Indiana Utility Regulatory Commission (IURC) Pipeline Safety Program Manual (PSPM) Section B, Inspection Planning, page 12.
- e. This is listed in Indiana Utility Regulatory Commission (IURC) Pipeline Safety Program Manual (PSPM) Section B, Inspection Planning, page 12.
- f. Located in Section C pages 7 & 8.

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

- Yes, this is listed in Indiana Utility Regulatory Commission (IURC) Pipeline Safety Program Manual (PSPM) Section B, Inspection Planning. Length of time since last inspection on page 12. Type of activity and risk scoring is located on pages 3-9.

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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 is listed in Indiana Utility Regulatory Commission (IURC) Pipeline Safety Program Manual (PSPM) Section D, Inspection Form and Violation Processing pages 1-3.
- b. Yes, this is listed in Indiana Utility Regulatory Commission (IURC) Pipeline Safety Program Manual (PSPM) Section D, Inspection Form and Violation Processing page 3.

c. Yes, this is listed in Indiana Utility Regulatory Commission (IURC) Pipeline Safety Program Manual (PSPM) Section D, Inspection Form and Violation Processing page 2.

- 4** (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident? 3 3
Yes = 3 No = 0 Needs Improvement = 1-2
- a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports
 - b. If onsite investigation was not made, do procedures require on-call staff to obtain sufficient information to determine the facts to support the decision not to go on-site.

Evaluator Notes:

- a. Yes, this is listed in Indiana Utility Regulatory Commission (IURC) Pipeline Safety Program Manual (PSPM) Section F, Investigation of Incidents pages 1-7.
 - b. Yes, this is listed in Indiana Utility Regulatory Commission (IURC) Pipeline Safety Program Manual (PSPM) Section F, Investigation of Incidents pages 3-4 discuss this but no documentation is listed. The reason to not go to an incident would be listed on the telephonic report form.
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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 |
| | <ul style="list-style-type: none">a. Completion of Required OQ Training before conducting inspection as leadb. Completion of Required IMP Training before conducting inspection as leadc. Root Cause Training by at least one inspector/program managerd. Note any outside training completede. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1) | | |

Evaluator Notes:

A review of TQ Crystal Report indicate the following individuals are qualified active hazardous liquid inspectors that have completed all required courses: Bill Boyd, Rich Medcalf and Charles Weindorf. The following individual has completed the courses to be lead on HL: Bill Boyd, Charles Weindorf & Rich Medcalf.

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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:

Yes, Bill Boyd has completed all required training courses at TQ and been the program manager for six of his 18 years, 2009-2012 and 2018 to present.

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

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. Construction (did state achieve 20% of total inspection person-days?)f. OQ (see Question 3 for additional requirements)g. IMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Random generated operators to be checked for this evaluation period consisted of 8 distributions, 3 transmissions, 2 LNG operators, 12 Master meter operators and one hazardous liquid operator. A review of Program Manager's "Operator Spreadsheet Type inspections for Records Audit 2020" provided the type of inspection with inspection number, date, type and inspectors initials. Using the spreadsheet the following inspection records were reviewed for Country Mark (IMP, OQ, Standard, D&A, & CRM). All inspections reviewed were found to be conducted in accordance to schedule cycle. No issues.

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|---|---|----|----|
| 2 | Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1. Do inspection records indicate that adequate reviews of procedures, records and field activities, including notes and the appropriate level of inspection person-days for each inspection, were performed?
Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Constructionf. OQ (see Question 3 for additional requirements)g. IMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Yes, a review of inspection forms that are located on the agency's share point site confirm the forms cover all applicable code requirements.

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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 |
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Evaluator Notes:

Yes, a review of inspection reports confirm the agency inspector is reviewing the companies OQ program. In this regard, a full OQ plan review is conducted. The following operator OQ Plans was reviewed: Country Mark

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|---|--|---|---|
| 4 | Is state verifying operator's integrity management Programs (IMP)? This should include a review of plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operator's plan(s). 49 CFR 192 Subpart P
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| | <ul style="list-style-type: none">a. Are the state's largest operator(s) plans being reviewed annually to ensure they are completing the full cycle of the DIMP/IMP process? | | |

Evaluator Notes:

Yes, a review IM inspection report for Country Mark confirm this item was completed.

- 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
- Operator records of previous accidents and failures including reported third-party damage and leak response to ensure appropriate operator response as required by 195.402; and
 - Directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies;

Evaluator Notes:

Yes,

a. & b. These items are covered in the inspection form and discussed with the operator during records and operation procedures review. Country Mark representative have attended the pipeline safety seminar where information about directional drilling/boring has been presented.

- 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

Evaluator Notes:

Yes, this item is addressed in the communication letter send to all operators from IURC on May 13, 2020. The letter contains information on PHMSA advisory items.

- 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
- Were compliance actions sent to company officer or manager/board member if municipal/government system?
 - Were probable violations documented properly?
 - Resolve probable violations
 - Routinely review progress of probable violations
 - Did state issue compliance actions for all probable violations discovered?
 - Can state demonstrate fining authority for pipeline safety violations?
 - Does Program Manager review, approve and monitor all compliance actions? (note: Program Manager or Senior Official should sign any NOPV or related enforcement action)
 - Did state compliance actions give reasonable due process to all parties? Including "show cause" hearing, if necessary.
 - Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns
 - 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:

- Yes, a review of the Country Mark NOPV inspection letters dated 1-21-2021 confirm it was send to Kimberly Smock VP Operations.
- Yes, four violations were found and noted in the letter.
- Due to joint inspection with PHMSA, IURC is waiting to hear from PHMSA on their findings before resolving the violations on CRM.
- Yes, all probable violations are reviewed by the inspector and program manager on a monthly schedule.
- Yes, when appropriate and determined by the severity of the violations found.
- Yes, this has been demonstrated in the gas program recently with civil penalties of \$1.769,000 against NIPSCO & Vectren.
- Yes, this item is listed in the procedure manual. Inspectors routinely review the inspection reports for follow-up action.
- Yes, this is addressed in the Commission's rules and regulations.
- Yes, a review of compliance letters and inspection reports reflect the post inspection was conducted via email or telephone conversation with operator representatives.
- Yes, a review of compliance letters and spreadsheet confirm this was provided to the operator. NOPV letters are send within 90 days per the Guidelines Section 5.1.5, "Procedures for notifying an operator when noncompliance is identified".

Additionally, all exit interviews are completed within 30 days, but most often upon the conclusion of the inspection.

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- 8** (Accident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations? 10 10

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

- a. Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports?
- b. Did state keep adequate records of Incident/Accident notifications received?
- c. If onsite investigation was not made, did the state obtain sufficient information from the operator and/or by means to determine the facts to support the decision not to go on site?
- d. Were onsite observations documented?
- e. Were contributing factors documented?
- f. Were recommendations to prevent recurrences, where appropriate, documented?
- g. Did state initiate compliance action for any violations found during any incident/accident investigation?
- h. Did state assist Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA?
- i. Does state share any lessons learned from incidents/accidents?

Evaluator Notes:

- a. Yes, this item is located in IURC Procedures Manual, Section F, Investigation of Incidents on page 3. The Division has established a Pipeline Safety Emergency Line for the reporting of incidents. The line is monitored 24 hours a day, 365 days a year, by a Pipeline Safety Program staff member.
- b-h. No incidents occurred in CY2020.
- i. Yes, information on previous incidents/accidents is shared with all operators at their pipeline safety seminar.

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- 9** Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

- Chairman Huston responded to Mr. Zach Barrett's letter dated November 20, 2020 was received on January 26, 2021. No issues were noted in the HL program.

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

Info Only = No Points

Evaluator Notes:

- The last pipeline safety seminar was in calendar year 2018 at French Lick, IN. IURC conducted a pipeline safety seminar for master meter operators in South Bend & Greenwood, IN. This seminar was conducted in calendar year 2019. These seminars were available to HL operators and Country Mark representatives were in attendance.

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

Info Only = No Points

Evaluator Notes:

- This item is located in IURC HL Transmission O&M Inspection form. A review of documents found this information was completed on each inspection.

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- 12** Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public). 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

This item is addressed in IURC website. Information on communication with stakeholders are found in the News Release section.

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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:

No safety related condition reports were filed or located in PHMSA Portal for CY2020.

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

Evaluator Notes:

- a. Yes, information from Robert Clarillos indicated a total of 18 surveys were conducted in 2020. Indiana participated in 8 of them.
 - b. No WM tasks were assigned to IURC in CY2020.
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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 |
|-----------|--|---|---|

Evaluator Notes:

No waivers/special permits have been issued in CY2020.

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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:

Yes, due to not being present and only available to review via Teams it was assumed all records and files are accessible.

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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:

Program Manager is familiar with the process of completing the SICT data. He is aware the SICT number for CY2021 is 11.

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

Reviewed the performance metrics with IURC staff members pertaining to inspection activity, inspection days, damages per 1,000 locate request. Excellent downward trend in damages and leaks were found.

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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 item was presented at the IURC Pipeline Safety Seminar in 2018. Additional meetings with Vectren, NPSCO and Centre Pointe representatives have occurred to present how they are using PSMS. In November 4, 2020 at the Indiana Damage Prevention Counsel (DPC) meeting, Steve Allen presented this topic to the operators in attendance. This same presentation was given at the North, Southwest, & Southeast DPC meetings in 2020.

20 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: 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:

This was a virtual construction inspection on Country Mark Company in Jefferson Township, Indiana. The project was a replacement of two shorted casings at a railroad crossing. The project also included the replacement of two valves on both sides of the track. This unit was last inspected the previous week in monitoring the construction project. Yes, company representatives were presented and made available records of the construction project and OQ documentation.

- 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:

Yes, Mr. Weindorf reviewed the operator's OQ and construction practices and documentation for compliance to company procedures and pipeline safety regulations. The virtual inspection was three days and witnessed the welding of sections of pipe and backfill of soil into the ditch line.

- 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:

Yes, Mr. Weindorf reviewed the operator's OQ and construction practices and documentation for compliance to company procedures and pipeline safety regulations. The inspection was three days consisting of welding of sections of pipe and backfill of soil into the ditch line. The inspection was of adequate length due to the amount of work to be performed. No issues were noted in the inspectors review of the project. Good working knowledge was demonstrated.

- 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:

Yes, from my observation Mr. Weindorf conducted a professional inspection on the construction project. He asked a lot of questions and checked the company personnel for compliance to OQ.

- 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:

Yes, at the end of the day, an exit interview was conducted with the operator's personnel. No violations or areas of concern were found.

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

Evaluator Notes:

Yes, safety procedures, eye protection, hard hats and safety vests were observed and being used during the entire construction project.

- 7 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



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

Evaluator Notes:

Yes, this is accomplished by each inspector conducting a review of the operator's annual reports prior to performing their inspection. This item is listed in Section B of the IURC procedures manual. Additionally, the inspector will use the Distribution Operator's F7100 Annual Review Check list to verify the data on the operator's report and analyze trends or potential risk areas, (leakage, corrosion, damages) prior to conducting the inspection.

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

Evaluator Notes:

Yes, IURC investigates excavation damages that occur on all natural gas & HL companies facilities. The operator is required to submit a report of damages to the agency in determining the root cause of the damage. IRUC reviews and investigate the damage report and makes a recommendation to the Underground Plant Protection Advisory Committee (UPPAC) on who caused the damage(s). The UPPAC reviews the investigation reports and renders a decision to issue a "Warning Letter", "Re-Training" or civil penalty to the contractor or operator. Excavators who have repeatedly violated the one-call law is addressed in IC 8-1-26.

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|---|---|-----------|-----------|
| 3 | Has the state reviewed the operator's annual report pertaining to Part D - Excavation Damage? | Info Only | Info Only |
| | Info Only = No Points | | |
| | <ul 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.)? | | |

Evaluator Notes:

- a. Yes this is accomplished by comparing the CRM Data program to the operator's individual reports on damages that occurred on the system.
- b. Yes, IURC staff reviews the operator's investigation reports and other data to confirm the cause of damages.
- c. Yes, IURC staff reviews these items during a review of the operator's investigation reports and other data in the annual report. Part of the review includes those items listed in Part D of the operator's annual report.
- d- j. Yes, the operator or their contractor locators are OQ qualified. This item is checked on each inspection and reviewed when a damage report is submitted to their agency for review. Yes, operators are continually requalifying locators who have failed to locate correctly. This is reviewed and discussed with the operator at meetings. In accordance to data collected by IURC for CY2020 the number of damages resulting from mismark was 95 out of 307. Facility could not be found was 38, incorrect facility records was 108, locating practices not sufficient 14, locator error 40 and site marked incomplete 3.

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

- a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.
- b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages?
- c. Has the state evaluated which of the following best describes the reason for the excavation damages; i.e., operator or contractor not following written procedures, failure to maintain marks, failure to support exposed facilities, failure to use hand tools were required, failure to test-hole (pot hole), improper backfilling practices, failure to maintain clearance or insufficient excavation practices.
- d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?

Evaluator Notes:

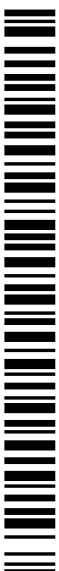
- a. Excavators are causing the highest number of damages in the State of Indiana.
- b. The monthly Damage Prevention Counsel Meetings address this issue and share information on causes of damages.
- c. Yes, IURC continues to monitor and analyze data from the annual report and damage reports submitted by operators to their agency. The number of damages has decreased due to the enforcement of the damage prevention law and their action in meeting with the operators on addressing failure to mark correctly, tolerance zones on markings and trained qualified locators.
- d. Yes, the Damage Prevention Counsel and public awareness outreach meetings has focused on causes of damage. This information is shared with all stakeholder groups.

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: 6
Total possible points for this section: 6



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:

IURC does not have a 60106 agreement with PHMSA nor an interstate agent.

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

Evaluator Notes:

IURC does not have a 60106 agreement with PHMSA nor an interstate agent.

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

Evaluator Notes:

IURC does not have a 60106 agreement with PHMSA nor an interstate agent.

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

Evaluator Notes:

IURC does not have a 60106 agreement with PHMSA nor an interstate agent.

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

Evaluator Notes:

IURC does not have a 60106 agreement with PHMSA nor an interstate agent.

- 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