



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

MISSOURI PUBLIC SERVICE COMMISSION

Document Legend

PART:

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



2020 Gas State Program Evaluation -- CY 2020

Gas

State Agency: Missouri

Agency Status:

Date of Visit: 04/27/2021 - 04/28/2021

Agency Representative: Kathleen McNelis, Pipeline Safety Program Manager, MOPSC

PHMSA Representative: David Lykken, Transportation Specialist, PHMSA State Programs

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

Name/Title: Mr. Ryan A. Silvey, Chairman

Agency: Missouri Public Service Commission

Address: 200 Madison, Suite 200

City/State/Zip: Jefferson City, MO 65101

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
- 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
10
0

0
15
10
50
15
10
0

TOTALS

100 100

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: Operator/Inspection Unit totals on Attachment 1 are consistent with the Operator/Inspection Unit totals on Attachment 3. No jurisdiction over LPG operators. b. No issues. c: No issues. Breakdown of Operators consistent with information found in the PDM. d. PDM shows 2 GD incidents reported. Matches PR under Attachment 4. e & f. No issues. g. Information verified through T&Q Blackboard training site. No issues. h. Working to adopt GT rule amendments (docket GW-2021-0272. Progress Report scoring -2 for no LPG Jurisdiction, -2 Points for civil penalties deficiency. Currently penalties at \$20K/\$200K. 46 of possible 50 pts scored. i: No issues.

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. Standard inspection procedure - Section 4.2.1 of MO Pipeline Safety Program Plan (Rev 8 4/07/21). Section 4.2.2 O&M and Emergency Plans, Section 4.2.3 Public Awareness. D&A Section 4.2.6, CRM Section 4.2.7. Pre-inspection activities for all inspection types addressed under Section 5 "Conducting Inspection"s. Post Inspection activities under Section 5.6. b: Pipeline Safety Program Plan (Rev 8) Section 4.2.5. Pre-inspection activities for all inspection types addressed under Section 5 "Conducting Inspections". Post Inspection activities under Section 5.6. c: Pipeline Safety Program Plan (Rev 8) Section 4.2.4. Pre-inspection activities for all inspection types addressed under Section 5 "Conducting Inspections". Post Inspection activities under Section 5.6. d: Pipeline Safety Program Plan (Rev 8) Section 10 Damage Prevention Program and One-Call Notification. e: Pipeline Safety Program Plan (Rev 8) Section 5.5.16 Onsite Operator Training Provided by MO PSC. f: Pipeline Safety Program Plan (Rev 8) Section 4.2.9. g: Pipeline Safety Program Plan (Rev 8) Section 4.2.11. Denotes requirement to conduct Std insps within a 3-year time interval. Also Section 5.5.11 for "Temporary/Mobile" facilities.
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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:

Pipeline Safety Program Plan (Rev 8 4/07/2021) Section 4 - Inspection Planning. Inspection Priorities - Section 4.2 identifies riskier and problematic aspects for each operator for determining inspection priorities. Time Intervals for Inspections under Section 4.2. The program's Priority List accounts for large operators with multiple units to insure an adequate rotation is performed. Unit breakdown for Spire East & West broken down by Inspection Checklist Parts 1 thru 4.

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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 |
|---|--|---|---|

- a. Procedures to notify an operator (company officer) when a noncompliance is identified
- b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns
- c. Procedures regarding closing outstanding probable violations

Evaluator Notes:

a: Procedure to notify company officer contained in section 2.5.5. b: Section 5.6.1 (Post Inspection Process) contains process for reviewing progress of and documenting of compliance actions (POV's and AOC's). c: Sections 5.6.2 (Follow-up Procedures), 5.6.3 (Further Enforcement), 5.6.4 (Complaints and Penalties) contain process regarding closing outstanding probable violations.

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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? | 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:

Yes, Section 6 - Failure Investigation and Safety Related Conditions. Appendix G - MOPSC Staff Notification Procedures for NG Incidents. Minimum PHMSA Incident Report Form, "Staff Records" and PHMSA Failure Investigation Report (FIR) template. Appendix I. b: Yes, Section 6 - Failure Investigation and Safety Related Conditions.

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

Evaluator Notes:

No issues identified. No point deductions.

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:

Yes. a thru c: Inspectors who performed OQ, DIMP/TIMP & LNG inspections as lead have completed the necessary T&Q training required for each. d: PM and six inspectors have completed the Root Cause training. e: Program staff attended various self-improvement training in CY2020. f: Inspectors performing Standard inspections as lead have the necessary core T&Q training.

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| 2 | Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
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Evaluator Notes:

Yes. As in past evaluation years, the PM has demonstrated adequate knowledge of PHMSA program and regulations having started with the pipeline safety program in 2008.

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

No issues identified. No point deductions.

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:

To avoid future point deductions certain inspection types last conducted and operators visited in CY2016 will need to be completed in CY2021 to meet maximum time intervals allowed. 44.66 % (205) of total SICT estimated field days (449) devoted to DT&C.

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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:

Program utilizes a combination of old PHMSA legacy inspection forms for most inspection types which are reviewed and updated annually to ensure minimum content. For construction - One form for Plastic and one for Steel installations.

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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:

Yes. 56.5 days devoted to OQ activities. Protocol 9 inspections typically done as part of standard inspections, during larger construction projects.

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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:

Yes. 12.1 days devoted to TIMP/DIMP activities. Per state law pipeline operators are required to submit plan changes no later than 20 days after the change is made. Reports of PE and mechanical fitting failures reviewed annually. c: Yes. Reviewed 10/06/2020 letter to operators advising them and providing copies of PHMSA Advisory Notices ADB-2020-01 (Inside Meters) and ADB-2020-02 (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 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:

Yes to all. Covered under O&M Procedures Review, Standard Inspection, O&M & Emergency Plan inspection forms. Reviewed 10/06/2020 letter to operators advising them and providing copies of PHMSA Advisory Notices ADB-2020-01 (Inside Meters) and ADB-2020-02 (Low Pressure Systems). The program has a checklist for both Distribution & Transmission operators for reviewing operator annual reports accuracy and for analyzing that data for trends and operator issues.

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:

Yes. As noted under question D-5 Reviewed 10/06/2020 letter to operators advising them and providing copies of PHMSA Advisory Notices ADB-2020-01 (Inside Meters) and ADB-2020-02 (Low Pressure Systems).

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:

Yes to all. No issues noted. Correspondence sent to appropriate company officials in all cases reviewed. Violations properly documented in correspondence and match totals note under Attachment 5 of PR. No civil penalties were assessed or collected in CY2020. Last in CY2019. Use of civil penalties evaluated on a case-by-case bases. PM reviews, approves and signs compliance actions taken. Reviewed program's "Attachment 5 backup" spreadsheet used to monitor compliance activities. 39 days devoted to compliance follow-up inspections. Written correspondence typically sent out one to two weeks on average after completion of inspection.

8	(Incident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations? Yes = 10 No = 0 Needs Improvement = 1-9	10	10
	<ul style="list-style-type: none"> 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: 800 Number or use Telephone Notice of Gas Incidents (staff contact list). b: Yes. Gas Incident Notification Form utilized to document notifications. c: No on-site investigations. Information was collected and FIR reviewed for 2/26/2020 incident. d: Yes. Reviewed Spire Incidents NRC 20200040 and NRC 20200071. Staff investigation documents for 2-26-2020 incident includes operator provided information. Staff investigation for 7-1-2020 is ongoing. Documents publicly available so far (Staff motion opening case and status report) are in EFIS under case GS-2021-0019. g: Possibly. Currently one docket opened for 2/26/2020 investigation. h: The program has demonstrated maintaining good communications with both AID and CR. I: State of the State presentation at NAPS Regional meetings and annual state operator seminar. Also letter to operators on occasions when issue comes up that should communicated.

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
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes. Letter sent to Chair 9/14/2020. Response from Chair received on 9/29/2020. Letters from Z. Barrett sent to program to support of civil penalty legislation efforts. The agency continues to pursue legislative change to increase maximum civil penalty amounts and to obtain jurisdiction over LPG systems. Not successful on either front to date. Currently penalties at \$20K/\$200K.

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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 annual MANGO seminar was canceled in 2020 due to Covid-19 restrictions. There was an in-person training at City of New Haven (requested by the City), and a MANGO general meeting (Oct 2020) was held remotely. Copy of agenda reviewed.

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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:

As noted last year confirmed under MOPSC Reporting Procedures of the O&M and Emergency Procedures Inspection checklist and MOPSC Gas Safety Standard Inspection Checklist. Verified annually via email request from Program Manager. No operators currently under federal enforcement for not submitting NPMS data.

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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:

MOPSC website. All Operators Letter (email). Open and closed cases accessed through the public website Electronic Filing and Information System. Link provided to Missouri One-Call.

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- 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:

No Safety Related Conditions reported in CY2020. Verified in WMS.

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- 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:

Yes, the State did participate and responded to NAPSR and federal surveys in CY2020. ? Threats on Low Pressure Systems (February 2020) ? P.E. Requirements for new inspectors (March 2020) ? State Program Vacant/Open Inspection Positions (April 2020) ? Gas Distribution Annual Report (June 2020) ? In-Service Welding Survey (September 2020) ? PHMSA TQ Liaison Survey on Failure Investigation Course (November 2020). Reviewed survey response regarding the States adoption of federal civil penalty levels. No IM notification tasks in CY2020. No SRC reports in CY2020 verified in WMS.

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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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Waivers for electrofusion and mechanical fittings noted in MOPSC Gas Safety Inspection Checklist for certain LDC's and municipalities to ensure conditions are being met. Three waivers issued in CY2020 with PHMSA approval. GE-2020-0295 (Farm Tap inspections included in company's DIMP program), GE-2020-0373 (Temporary extension of company atmospheric corrosion inspections and leak surveys by no later than 12/31/20), GE-2020-0373 (granting extension for completing prior corrosion and leak surveys to 3/31/2021), and GE-2020-0373 granting third extension to be completed no later than 7/31/2021.

16 Were pipeline program files well-organized and accessible?

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues. Documentation readily provided during remote sessions and in prior requests via email exchange.

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:

Field day requirement in CY2020 was 459. 679 total days achieved. Tool was updated in CY2020. 44.66 % (205) of total SICT estimated field days devoted to DT&C.

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:

Discussed. Hits per 1000 locates requested up in CY2020 to 3.25 from a previous low of 2.9 in CY2019. Average inspection days impacted by Covid-019 restrictions but estimated days exceeded. Insp Qualification Core training continues at 90%. 5-year retention approximatley 60%.

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:

Yes. Has been discussed at past MANGO seminars.

20 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Question D-1: To avoid future point deductions certain inspection types last conducted and operators visited in CY2016 will need to be completed in CY2021 to meet maximum time intervals allowed.

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:

O&M and Emergency Plan review of the St. Joseph Housing Authority's Museum Hill Apartments master meter system via WebEx. Operator was present. Last inspected in Feb 2019. MOPSC inspectors Greg Williams and Clinton Foster observed.

- 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. MOPSC "O&M and Emergency Procedures Inspection Checklist" Rev 10/25/2019 utilized for this review. Inspection results adequately documented.

- 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. Pre-inspection office review of the operator's written O&M and Emergency plans conducted prior to engaging with the operator. Any issues noted during the preliminary review discussed during WebEx meeting. Except for welder qualification, no records or field facility checks were conducted as part of this inspection. Duration of inspection was of adequate length to perform review and document results.

- 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. Both Mr. Williams and Mr. Foster demonstrated good working knowledge of the safety program and regulations.

- 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, a post inspection briefing was conducted. Several items were identified requiring amendments to the operator's written procedures.

- 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:

Inspection was conducted remotely via WebEx. The inspectors conducted themselves in a courteous and professional manner.

7

General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues noted.

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. Covered under the program's Annual Report checklist. See Section 4.3.1 of program's written procedures. As noted previously the program reviews trends in data each individual operator reports in PHMSA annual reports, using a spreadsheet that is populated with annual report data from 2010 through most recent PHMSA annual report data.? Staff reviews trends in data reported by each operator, including but not limited to excavation damages by root cause. Program staff have developed a new form to further document these reviews.?A similar evaluation for trends in mechanical fittings failures reported by operators.

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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 | 2 |
|----------|--|---|---|

Evaluator Notes:

The program has reviewed the criteria PHMSA added as Part F - Damage Prevention & Annual Report Analysis to the state pipeline safety program evaluation form.? Using this criteria as a basis, and per the guidance provided by PHMSA to NAPSRS, MO PSC Staff sent a questionnaire to the seven MO PSC jurisdictional operators reporting 20 or more excavation damages in calendar year 2019. A copy of the questionnaire was reviewed during this evaluation.

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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:

Yes to all. Also, in conjunction with other departments of the MO PSC, Safety Engineering Staff worked to develop the scope for a quality assurance study into pipeline locating practices. This scope was submitted to PHMSA in Missouri's 2020 One Call Grant application, and is currently being implemented. A copy of the sheet from the grant agreement describing this project was reviewed during this program evaluation.

- | | | | |
|----------|---|---|---|
| 4 | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests?
Yes = 2 No = 0 Needs Improvement = 1 <ol style="list-style-type: none">a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public. | 2 | 2 |
|----------|---|---|---|

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

Evaluator Notes:

CY2020 preliminary data indicates that locating company and excavator groups are the leading cause of pipeline damages. As noted previously, MO PSC reviews trends in data each individual operator reports in PHMSA annual reports, using a spreadsheet that is populated with annual report data from 2010 through most recent PHMSA annual report data.? Staff reviews trends in data reported by each operator, including but not limited to excavation damages by root cause (data reporting began in 2016 for CY 2015 for excavation damage by root cause data).?The program presents aggregated damages/1,000 locate request trend data to PHMSA annually during NASPR Central Region meetings. The program discusses results and trends for individual operators during IM/DIMP inspections.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues.

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:

N/A. Not a Interstate agent or 60106 agreement State.

- 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:

N/A. Not a Interstate agent or 60106 agreement State.

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

Evaluator Notes:

N/A. Not a Interstate agent or 60106 agreement State.

- 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:

N/A. Not a Interstate agent or 60106 agreement State.

- 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:

N/A. Not a Interstate agent or 60106 agreement State.

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

Evaluator Notes:

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