



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

1200 New Jersey Avenue SE
Washington DC 20590

2021 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



2021 Gas State Program Evaluation -- CY 2021

Gas

State Agency: Iowa

Agency Status:

Date of Visit: 08/22/2022 - 08/24/2022

Agency Representative: Joe Subsits, Rex Evans

PHMSA Representative: Kevin Yearington Sanel Lisinovic

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

Name/Title: Geri Huser, Chair

Agency: Iowa Utilities Board

Address: 1375 East Court Avenue

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 2021 (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
9
48
15
10
0

TOTALS

100

97

State Rating

97.0

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:

- Attachment 1 lists 110 gas operators 177 units. 7 LDCs 36 units. 50 municipals 50 units, 2 LPG 2 units and 0 master meters. 1 other 1 other unit. This unit is a cooperative cogen system. 42 intrastate transmission, 69 units and 5 interstate transmission with 13 units and 2 intrastate LNG 5 units . One Interstate LNG and One unit. A new gathering will be built this year. IUB believes they have the authority to regulate this system. Iowa is interstate agent. Iowa uses an access data base. The data base is compared with Pipeline Data Mart to confirm pipeline Operators.
- Iowa had 539 total inspection days. There were 104 design and construction days. This was 23% SICT Days. Time cards and tracking sheet are used to determine inspection days.
- The Unit count on attachment 3 matches Attachment 1 numbers except attachment 3 lists 51 municipal units. 51 is the actual number of municipal systems. Operators on random list were found on attachment 3.
- Five federally reportable incidents were reported in Iowa. These were reported by Black Hills Energy, These incidents were confirmed in the Pipeline Data Mart. Two incidents were LNG incidents. Three incidents were distribution incidents.
- Compliance information does not add up correctly and is being evaluated by IUB for correction.
- Records were maintained electronically. Records were readily accessible.
- Iowa has a total staff of 11, 1 supervisors. Blackboard results matched with progress report submission.
- Iowa is up to date on amendment adoptions. Iowa Adopted (\$100,000/\$1,000,000) penalty amounts.
- Planned performance and past performance activities were identified by state. Two new inspectors were hired, SICT days met, construction days of over 20% were met.

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

- | | | | |
|---|---|---|---|
| 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 |
|---|---|---|---|
- a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspections
 - b. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually)
 - c. OQ Inspections
 - d. Damage Prevention Inspections
 - e. On-Site Operator Training
 - f. Construction Inspections (annual efforts)
 - g. LNG Inspections

Evaluator Notes:

Pre and Post inspection procedures are found in section 5.3 and 5.5.

a. Procedure for field and records inspection are found in section 5.4.1 of Iowa's procedures. Public awareness found in section 5.4.9 No procedures were found for Drug/Alcohol, or CRM inspections. This issue was raised during the exit interview.

b. Procedures for TIMP and DIMP integrity inspections are found in section 5.4.6 for TIMP inspections and section 5.4.8 for DIMP inspections.

c. OQ inspections are found in section 5.4.3.

d. Damage Prevention activities are described in section 5.4.5.

e. Operator training is covered in Section 5.4.4. The procedure mention pipeline safety seminars and participation in Iowa one call seminars.

f. Construction inspections 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 |
|---|--|---|---|
- a. Length of time since last inspection
 - b. 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 and procedures are addressed in section 4.2. Prioritization considers outstanding compliance issues, system and HCA mileage, length of time since last inspection, operator activities and operator type. The Inspection plan is based on risk prioritization and required inspection intervals.

f. Inspection units are based on company districts.

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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. Procedures to notify operator of probable violations are found in Section 5.5.1. The operator is notified by exit interview

and in writing. Exit interview language should state exit interviews are required within 30 days from last day of inspection. Procedures should also require documentation within 90 days. This was brought out during the exit interview.

b. Compliance follow up activities are found in Section 5.5.2. Violations remain in data base until cleared.

c. Closure of probable violations is addressed in Section 5.5.3. Probable violations require validation of compliance before closure. Open violation are tracked on data base weekly and forwarded to inspectors by admin staff.

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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:

- a. Incident notification is addressed in section 6. IUB is required to be contacted by operators for state and federally reportable incidents. The State role in investigations is to determine cause and make recommendations to prevent reoccurrence.
- b. The State investigates injury and fatality incidents. Go No go decisions requires a memo.

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

Evaluator Notes:

There are no issues with part B.

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



PART C - State Qualifications

Points(MAX) Score

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|---|---|---|---|
| 1 | Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.3
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:

- Alex Milewski, Dan Oconnor, Darin Tolzin, Dave McCann, Natasha Welsh and Sanel Lisinovic are gas core qualified. Dan OConnor, Darin Tolzin, Dave McCann, Natasa Welsh and Senel Lisinovic were failure investigation qualified.
- b. Darin Tolzin, Dave McCann and Sanel Lisinovic were OQ qualified.
- c. Dan Oconnor and Dave McCann were gas IMP qualified. DIMP qualified inspectors were Dan Oconnor, Dave McCann and Sanel Liinovic were gas DIMP qualified.
- c. Dan Oconnor and Dave McCann are LNG trained.
- d. Darin Tolzin, Dave McCann, Natasha Welsh and Sanel Lisinovic were root cause trainind.

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

Evaluator Notes:

Kevin Yearington is the new program manager. Kevin has been program manager for less than a year. Kevin used to work on gas municipal systems. He needs to complete his core training classes. There will be a 1 point deduction for being a new program manager.

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

Evaluator Notes:

There is a 1 point deduction for a new program manager with no program experience.

Total points scored for this section: 9
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 | 4 |
| | <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:

Inspection dates and intervals were checked for all operators on the random operator list. Three DIMP inspections were beyond the five year interval.

- a. Standard inspections were within the five year interval.
- b. Public awareness effectiveness reviews were within the five year interval.
- c. Drug and Alcohol inspections were within the five year interval.
- d. Control Room Management inspections were within the five year interval.
- e. LNG inspections were within the three year interval.
- f. 20 % of SICT days were construction days.
- g. OQ inspections were within the five year interval.
- h. Three DIMP inspections were beyond the five year interval. These are the City of Mapleton which was last inspected on 12/19/2014. Wall Lake was last inspected on 10/31/2019, the previous inspection was 10/31/2012. The City of Hartley was last inspected on 10/5/2020 and was previously inspected on 5/21/2014. This will result in a one point deduction.

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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. IA is used for standard inspections. Forms were filled completely.
- b. IA is used for public awareness inspections. Forms were filled out completely.
- c. IA is used for Drug and Alcohol inspections, Forms were filled out completely.
- d. IA is used for control room inspections. Forms were filled out completely.
- e. IA is used for LNG inspections. Forms were filled out completely.
- f. A state form is used for LDC construction inspections.
- g. IA is used for control room management inspections. Forms were filled out completely.
- h. IA is used for IMP/DIMP inspections. Forms were filled out completely.

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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:

OQ programmatic inspections were performed within the required intervals. Protocol 9 was used for most of the inspections that were looked at.

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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 Subparts O and P
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|
- a. Are the implementation plans of the state's large/largest operators(s) being reviewed annually to ensure they are completing full cycle of the 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. Large LDC plans are reviewed annually . Integrity Management Plans are submitted annually and are reviewed . Work assignments are made at meeting at beginning of year. Meetings are conducted with inspectors at end of year to critique the imp plan. An annual review of operator plan meeting is then conducted with specific operators.
- b. Problematic pipe is identified during the DIMP inspection. There is no cast iron or bare steel in Iowa.
- c. Magid sent an email out of 2/12/2020 to inform LDC's of need to include low pressure systems in the DIMP threat analysis.

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| 5 | Did the state review the following (these items are NTSB recommendations to PHMSA that have been deemed acceptable response based on PHMSA reviewing these items during the evaluation process): Chapter 5.1
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:

- a&b) No cast iron in Iowa
- 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) Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

Magid sent notice August 25 letter notifying operators of recent advisory bulletin.

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 <ul style="list-style-type: none"> 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) 	10	10
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Evaluator Notes:

- a. Compliance letters were sent to chief executive officer
- b. Probable violation were documented properly.
- c. Probable violations were appropriately resolved.
- d. Outstanding violation tracked periodically and status reports sent to engineers
- e. Compliance actions were initiated for all violations identified during inspections.
- f. Penalties have been issued for damage prevention violations.
- g. Inspection reports and violations are reviewed by supervisory engineers and the program manager.
- h. Show cause hearing are an operators option and are identified in compliance letters. No show cause hearings occurred last year.
- i. Exit interviews were conducted within 30 days of the last day of the inspection.
- j. Compliance letter were submitted within 90 days of the last day of the inspection.

f. AG has fined violator of damage prevention violations.

8	(Incident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations? Yes = 10 No = 0 Needs Improvement = 1-9 <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? 	10	9
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- 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:

- There were five incidents all by Black Hills Energy, Incidents occurred on 6/19/21, 7/11/21, /8/30/21 9/8/21 and 12/17/21
- a. Kevin gets incident notices from state duty officer. Kevin will assign engineer to respond when incident occurs.
 - b. A duty officer log has information on reportable incidents for all notification's.
 - c. A memo would be written.
 - d. An investigation Report was not written for two of the incidents.
 - e. An investigation Report was not written for two of the incidents.
 - f. An investigation Report was not written for two of the incidents. This results in a one point deduction.
 - g. No compliance action was taken as result of the incident investigations.
 - h. Iowa works with AID to coordinate incidents.
 - i. Lesson learned are shared at NAPS Central regional meeting and during state safety seminars.

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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:

11/16/21 letter went to Chair Geri Huser. There were no issues to address so a letter was not required. Geri Huser is still the chair.

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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 gas seminar February 8 and 9, 2021, the previous seminar was on February 2019.

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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:

Mapping submission is required to Iowa, Also, the inspector Checks NPMS submission status during the standard 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:

The web site contains Information on regulation, one call information, inspection reports, compliance actions, and enforcement action.

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| 13 | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.7 | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

Evaluator Notes:

There was one SRC by Black Hills Energy caused by MAOP plus build up. There were 10 interstate SRCs for conditions that could lead to imminent threats. Information on SRCS was maintained on WMS.

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

- a. The Communication manager fills surveys out NAPSRS surveys.
b. WMS was up to date. Kevin has not received any PHMSA notifications though he keeps up with them.

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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:

There was an 11/25/2007 waiver for Allerton Gas Co, Consumer Energy and 49 municipal utilities. This required annual requalification and requalification after unacceptable joint found. 8/6/13 waiver allow the Cities of Alton and Mapleton to requalify during low activity periods. A letter was sent to operator to determine if waivers still required.

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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:

The files were electronic and information appeared readily 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 |
|-----------|---|---|---|

Evaluator Notes:

in 2021, 437 SICT days were required. 87 construction days were required. The Progress report has 539 days with 104 construction days. There were no peer review notes to address for Iowa..

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

Evaluator Notes:

There was a Slight decrease in damages per 1000 locates. Certification Enforcement and investigation score held constant at 100%. There was a slight decrease in core training and 5 year retention. There was a decrease in leaks and increase in repairs. We talked about drilling down on damage prevention data.

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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:

SMS is discussed during quarterly meetings with the operator.

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

There was a two point deduction for DIMP inspections conducted beyond the 5 year interval and not writing investigation reports for incidents,

Total points scored for this section: 48
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:

- Darin Tozin and Paul Hansen performed a construction inspection of Mid American. Paul is a new inspector.
- Construction inspections were conducted at Alcohah and Norwalk.
- Contractors were on-site. Company officials were not present.
- Darin had 3 years with IUB, 18 years in pipeline construction. Paul had less than one year experience.

- 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:

Darin used a state form and took notes during 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:

- Darin checked coating application and welding procedures.
- Operator qualification and calibration records were checked.
- Numerous field observations were made. These included coating and pipe condition, Jeeping, Pressure testing , fusing procedures, coating application, trench conditions, night caps and locates.
- N/A
- Inspection was the proper length.

- 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:

Darin appeared to have good knowledge of construction activities. He asked good questions.

- 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:

An exit interview was conducted at the end of both construction inspections. There were two inspections conducted.

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:

- a. Inspectors wore proper PPE and performed the inspection safely.
- b. Darin observed fusing parameter, coating application and procedure, trench conditions, pressure test and locates.
- c-d. Darin laminated construction cheat sheet to remind him of things to check.

7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues with Part E.

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:

Sunil reviews annual reports and enters results in a spreadsheet. The review may result in staff review letter. Only two years of data have been collected so far.

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

This is part of the annual review process.

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

a-j. investigator investigates one call complaints. This information is evaluated during damage prevention investigations and the annual review process.

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

a. Most complaints are with the operator..

b,d Covered during the Public awareness inspection
c. Done during damage prevention investigations and annual review.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues with part F.

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 uses Inspection Assistant to conduct all inspections

- 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:

No violation were found in 2021.

- 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:

No such issues were found in 2021. PHMSA would be notified immediately.

- 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:

They would notify PHMSA if such a condition occurred.

- 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:

IUB interacts with AID during incidents,

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

Evaluator Notes:

No issues with Part G

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