



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

ILLINOIS COMMERCE 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



2021 Gas State Program Evaluation -- CY 2021

Gas

State Agency: Illinois

Agency Status:

Date of Visit: 06/13/2021 - 06/17/2021

Agency Representative: Matthew T. Smith, Assistant Director, Safety & Reliability Division, Illinois Commerce Commission

PHMSA Representative: Agustin Lopez, State Evaluator, PHMSA

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

Name/Title: Carrie Zalewski, Chairman

Agency: Illinois Commerce Commission

Address: 527 East Capitol Avenue

City/State/Zip: Springfield, Illinois 62701

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 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
10
45
15
10
0

TOTALS

100 95

State Rating 95.0

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. Reviewed operator list and compared with PDM.
- b. Reviewed ICC data on inspection days. Track days on spreadsheets for each inspector and inspections. Lost 4 points in Progress Report review for not meeting SICT inspector days.
- c. Verified operator list with PDM.
- d. Verified reportable incidents in PDM and all were investigated by the ICC.
- e. Carry over did not match previous years due to changing how violations are tracked and counted.
- f. List records that are kept by the ICC.
- g. Reviewed training in TQ Blackboard. Need to qualify inspectors on IMP, only one current inspector is qualified as a gas IMP inspector.
- h. ICC has adopted all required regulations or amendments within the 2 year requirement.
- i. ICC summarized their planned performance and accomplishments for damage prevention in Attachment 10.

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



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

The ILL CC has the "Pipeline Safety Program Standard Operating, Enforcement and Incident Investigation Procedures" which include detailed inspection procedures. Part V has detailed procedures that gives guidance to inspectors on how to conduct each type of inspection. Section B and R include Pre and Post inspection activities. Part V Section P has LNG inspection procedures which will be conducted every 2 years which will be corrected to 3 years.

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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 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:

The ILL CC has the "Pipeline Safety Program Standard Operating, Enforcement and Incident Investigation Procedures" which cover inspection priorities and time frames for inspections. Part IV section B has inspection priority methods which ranks inspections utilizing risk factors. Part IV section C has established inspection intervals of 5 years for NG operators and 3 years for LNG operators.

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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 identified b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns c. Procedures regarding closing outstanding probable violations | | |

Evaluator Notes:

Part V Section S,T,U,V,W and X address compliance activities.

- a. Section S states that compliance letters will be sent to company officers.
- b. Section V addresses the tracking of compliance actions to prevent delays or breakdowns. Operators are given 30 days to respond and if no response after 5 days inspectors contact operator.
- c. Section W. Following are options for correcting/closing compliance cases: The operator's response to the NOPV letter includes documentation of correction of the deficiency; A follow-up audit has been conducted to verify correction of the deficiency; A regularly scheduled audit of the operator has verified the violation issue no longer exists; Issuing a civil penalty and confirmation of the violation remediation.

- 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:

Part VI includes Investigation of incidents which includes a mechanism for receiving notifications and how to conduct an incident investigation. Incident investigation procedures are very detailed which give guidance to inspectors on conducting investigations.

a. Under 83 IL. Adm. Code 595, the pipeline operator is required to give telephonic notice of all incidents caused from gas escaping from pipeline facilities resulting in property damages exceeding \$50,000, release of three million cubic feet of natural gas, injury requiring overnight hospitalization, or a fatality. The Commission has established a Pipeline Safety Emergency Line (217) 782-5050, for the reporting of incidents. The line is monitored 24 hours a day, 365 days a year, by Pipeline Safety Program staff during working hours and a contracted answering service on nights, weekends, and holidays.

b. Procedure includes creating a record to document reasons why an on-site investigation was not conducted.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The ICC is mainly complying with Part B of the evaluation.

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:

Verified training with TQ Blackboard to assure inspectors are qualified to lead each type of inspection.

- a. Reviewed OQ inspections to assure lead inspectors were qualified.
- b. Reviewed DIMP/IMP inspections to assure lead inspectors were qualified.
- c. Reviewed LNG inspections to assure lead inspectors were qualified.
- d. Have several inspectors who have completed the root cause training course.
- e. no outside training.
- f. Reviewed standard inspection reports to verify lead inspectors were qualified.

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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 | 5 |
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Evaluator Notes:

Yes, Matt Smith is very knowledgeable of the pipeline safety program and regulations. Has been with ICC since 2007.

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

The ICC is mainly complying with Part C of the evaluation.

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 | 0 |
| | <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:

Reviewed randomly selected inspection reports and found inspections that were not completed within the time interval established in the ICC procedures and required per the State Guidelines. The following are the inspections with the last inspection year;

Record Inspections

Midwest Generation-2016

Field Inspections

Midwest Generation-No Audit

O&M Inspection

Ameren Illinois- 2013

People's Gas- 2016

IMP/DIMP

Ameren Illinois Company distribution- No record of IMP

Ameren Illinois Company transmission- 2015

Northern Illinois Gas- 2015

People's Gas Light transmission- 2014

Pinckneyville Municipal Gas- 2014

OQ

People's Gas -2013

Midwest Generation- No record

PAPEI

Ameren- 2014

People's Gas- 2016

North Shore Gas- 2016

Northern Illinois Gas- 2012

DA

Ameren- 2015

People's Gas- 2015

Midamerican Energy- 2015

North Shore Gas- 2015

Northern Illinois- No Audit

Midwest Generation- No Audit

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

- a. Standard (General Code Compliance)
- b. Public Awareness Effectiveness Reviews
- c. Drug and Alcohol
- d. Control Room Management
- e. Part 193 LNG Inspections
- f. Construction
- g. OQ (see Question 3 for additional requirements)
- h. IMP/DIMP (see Question 4 for additional requirements)

Evaluator Notes:

Reviewed randomly selected inspection reports to verify completion and applicable code requirements. Inspection reports were completed and no issues were identified.

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

Evaluator Notes:

The ICC conducts OQ Plan inspections as well as Protocol 9 field inspections. Reviewed several Protocol 9/Form 15 inspections.

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| 4 | Is state verifying operator's integrity management Programs (IMP and DIMP)? This should include a review of plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operator's plan(s). 49 CFR 192 Subparts O and P | 2 | 2 |
| | | Yes = 2 No = 0 Needs Improvement = 1 | |
| | | <ol style="list-style-type: none">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:

The ICC conducts IMP inspections but found several transmission operators and two distribution operators which had not had an IMP Inspection within the established time intervals to verify operator's integrity management program plans are in compliance. The following were the operators with the year of the last IMP inspection:
Pinckneyville Municipal Gas- 2014

Although the ICC hasn't conducted the IMP inspections they have conducted field inspections on the large operators during ILI runs and verification digs. The ICC needs to complete the IMP Plan inspections to avoid losing points in the future.
Ameren Illinois Company distribution- No record of IMP
Ameren Illinois Company transmission- 2015
Northern Illinois Gas- 2015
People's Gas Light transmission- 2014

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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 | 2 | 2 |
| | | Yes = 2 No = 0 Needs Improvement = 1 | |
| | | <ol style="list-style-type: none">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:

NTSB questions have been incorporated into the inspection forms. Low pressure question was held face to face with operators with low pressure systems. Only three had low pressure but one removed all low pressure. One other is in process of converting to medium pressure. Will only have one operator with low pressure. Field Audit check list ILPS4 includes Customer Service Meter questions which include inside meter sets.

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

Evaluator Notes:

The ICC has a link (Advisories) in the Pipeline Safety section of the website that includes PHMSA advisory bulletins providing to all stakeholders. The ICC reviews with operators during Standard - O&M Procedures Inspections.

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| 7 | (Compliance Activities) Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1 | 10 | 10 |
| | 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) | | |

Evaluator Notes:

Compliance follow up is tracked in program database to assure no delays. Program manager reviews all compliance actions. Exit briefings are uploaded to website which are conducted at end of each inspection and include description of findings. Cover both the 30 and 90 day notification requirements. Reviewed randomly selected inspection files to assure compliance actions are resolved on a timely manner.

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| 8 | (Incident 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:

Yes, all reportable incidents were investigated by the ICC. The investigations are still on going.

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:

Yes, the ICC responded within the required 60 days.

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:

Last seminar was on October 27-28, 2021.

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:

Yes, the NPMS is a question on Transmission inspection form which verification is conducted during inspection

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 ICC website contains a lot of pipeline safety information which include inspection reports and enforcement documentation.

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:

Had two SRCR in PDM which were investigated/inspected by ICC and closed in WMS.

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

Evaluator Notes:

Yes, respond to PHMSA and NAPSIR requests and surveys. In reviewing the WMS the ICC responds to WMS assigned tasks.
Have closed out SRCR 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.
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, there has been passed waivers that are being tracked by the ICC. The only waiver which has special conditions was issued to Ameren which deals with atmospheric and leak surveys.

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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, documents were provided electronically and thru the website which seem very well organized and secured. Keep records in their Pipeline Database.

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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:

May not meet SICT inspector days due to turnover. Construction days may also not be met.

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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:

Training may go down due to losing inspectors and hiring new employees. Leak data is on an upward trend but may be due to 114 requirements. Scheduled leaks for repair have decreased over the years.

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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 |
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Evaluator Notes:

The ICC has promoted and encouraged operators to implement Pipeline Safety Management Systems (PSMS). In a docketed case to approve the merger involving Nicor, the Commission included in the order that Nicor implement PSMS as a condition to the merger's approval. Pipeline Safety monitors Nicor's progress. As a result of the Commission's actions and encouragement, the four largest private distribution operators in Illinois have implemented PSMS. ICC's Pipeline Safety promote PSMS in the seminars.

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

The following were issues found during the evaluation:

D.1 - Reviewed randomly selected inspection reports and found inspections that were not completed within the time interval established in the ICC procedures and required per the State Guidelines. There is a 5 point deduction for this issue.

Total points scored for this section: 45
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:

New Harmony
Marc Conner, Lead Inspector
Virtual OQ Inspection
July 12-13, 2022
Agustin Lopez, PHMSA State Evaluator

- OQ Inspection
- Last OQ was in 2015.
- Yes, contract company representative was present
- Marc Conner has not been evaluated in the past.

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- 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, inspector utilized OQ Inspection Form 14 during the inspection.

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- 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:

- Reviewed OQ Plan for compliance.
- Reviewed OQ records of pipeline technicians.
- No field activities performed during the inspection.
- no other types of activities.
- Yes, the inspection was adequate in length.

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- 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, Marc Conner has been with the ICC for about six years and is knowledgeable of the pipeline safety program and regulations.

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- 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, the inspector conducted an exit briefing with the operator to discuss any findings. There were no issues identified.

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 ,the inspection was conducted in a safe, positive and constructive manner.

7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Marc Conner conducted an OQ inspection and was knowledgeable of the pipeline safety regulations. He conducted himself professionally and performed an excellent job.

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 |
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Evaluator Notes:

The ICC conducts Annual Report reviews/inspections as part of their risk analysis. Also review incident reports for accuracy and root causes.

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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 |
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Evaluator Notes:

The ICC documents its review of damage prevention and discussion with operators on a form developed by the National Association of Pipeline Safety representatives.

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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 |
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Evaluator Notes:

The ICC documents its review of damage prevention and discussion with operators on a form developed by the National Association of Pipeline Safety representatives. Part D is also reviewed during the Annual Report inspection conducted yearly by the ICC>

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|---|---|---|---|
| 4 | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests?
Yes = 2 No = 0 Needs Improvement = 1 <ol style="list-style-type: none">a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages?c. Has the state evaluated which of the following best describes the reason for the excavation damages; i.e., operator or contractor not following written procedures, failure to maintain marks, failure to support exposed facilities, failure to use hand tools were required, failure to test-hole (pot hole), improper backfilling practices, failure to maintain clearance or insufficient excavation practices.d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages? | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

The ICC collects the damages per 1,000 during their Annual Report reviews. One call enforcement is within the ICC so data is compared for accuracy.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The ICC is mainly complying with Part F of the evaluation.

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:

The ICC is not an interstate agent nor has a 60106 certification.

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

Evaluator Notes:

The ICC is not an interstate agent nor has a 60106 certification.

- 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:

The ICC is not an interstate agent nor has a 60106 certification.

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

Evaluator Notes:

The ICC is not an interstate agent nor has a 60106 certification.

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

Evaluator Notes:

The ICC is not an interstate agent nor has a 60106 certification.

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

Evaluator Notes:

The ICC is not an interstate agent nor has a 60106 certification.

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