

**PHMSA UNDERGROUND NATURAL GAS STORAGE (UNGS)  
IL DNR PROGRAM EVALUATION – CY2021  
CONDUCTED 8/22-25/2022**

<b>A – PROGRESS REPORT AND PROGRAM DOCUMENTATION REVIEW</b>	<b>9 of 9</b>
<b>B – PROGRAM INSPECTION PROCEDURES</b>	<b>14 of 14</b>
<b>C – PROGRAM PERFORMANCE</b>	<b>31 of 31 (34)</b>
<b>D – COMPLIANCE ACTIVITIES</b>	<b>12 of 12 (21)</b>
<b>E – INCIDENT INVESTIGATIONS</b>	<b>4 of 4 (13)</b>
<b>F – DAMAGE PREVENTION</b>	<b>4 of 4</b>
<b>G – FIELD INSPECTIONS</b>	<b>12 of 12</b>
<b>H - 60106 AGREEMENT STATE (if applicable)</b>	<b>6 of 6</b>
<b>TOTAL PROGRAM EVALUATION POINTS</b>	<b>92 of 92 (113)</b>

## PHMSA UNGS STATE PROGRAM EVALUATION – CY2021

<b>A – PROGRESS REPORT AND PROGRAM DOCUMENTATION REVIEW</b> <b>THIS SECTION ANALYZES ACCURACY AND COMPLETENESS OF ANNUAL PROGRESS REPORT</b>		SCORE
1	<p>Accuracy of Jurisdictional Authority and Operator/Inspection Units Data – Progress Report Attachment 1 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. Attachment 1 correlates with Attachment 3 and Program Partner records.</b></p>	1
2	<p>Review of Inspection Days for accuracy – Progress Report Attachment 2 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. Attachment 2 agrees with Partner records.</b></p>	1
3	<p>Accuracy verification of Operators and Operators Inspection Units in State – Progress Report Attachment 3 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. Attachment 3 agrees with Partner records.</b></p>	1
4	<p>Accuracy verification of Compliance Activities – Progress Report Attachment 5 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. Attachment 5 agrees with Partner records. Observed that the ‘14 compliance actions’ is really ‘one compliance action’ with 14 Unsatisfactory items. Advised IL to make the correction in next year’s report and include an explanatory note describing the changes.</b></p>	1
5	<p>Were UNGS program files well-organized and accessible? - Progress Report Attachment 6 (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: Yes. The records are in an easily accessible Database.</b></p>	2
6	<p>Was employee listing and completed training accurate and complete? – Progress Report Attachment 7 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. Attachment 7 is consistent with IL OOGRM records. 1.03 inspector years; Training is verified with TQ records. All okay.</b></p>	1
7	<p>Verification of Part 192 and 199 Rules and Amendments – Progress Report Attachment 8 (Yes= 1 point, No= 0 Points)</p> <p><b>Comments: Yes, Attachment 8 agrees with internal records. Re-discussed that these rules need to be adopted prior to becoming a 60105 Partner. No immediate plans for becoming a 60105 partner.</b></p>	1
8	<p>List of Planned Performance - Did State describe accomplishments on Progress Report in detail – Progress Report Attachment 10 (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. Attachment 10 is an accurate report of 2021 activities.</b></p>	1

9	<b>General Comments:</b> Ms. Colleen Callahan, Director, Illinois Department of Natural Resources, One Natural Resources Way, Springfield, Illinois, 62702-1271; Ernest Kierbach, Field Manager OOGRM; Patrick Gaume, Evaluator. UNGS PROGRESS REPORT REVIEW score is 44 of 50: 6 pt. reduction due to 60106 jurisdiction. No incidents were reported in UNGS for 2021. Part A scored 9 of 9 points.	9
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<b>B – PROGRAM INSPECTION PROCEDURES</b> Does State Inspection Plan include procedures that address the following elements? (See Guidelines Section 5.1)		
1	Does State have written inspection procedures?(Yes= 2 points, No= 0 Points, NI=1 point) <b>Comments: Yes. Underground Natural Gas Storage Intrastate – 60106 Agreement Procedures Manual. Also, the Well Inspector’s Field Manual.</b>	2
2	<b>Standard Inspections</b> Do Standard Inspection procedures give guidance to State inspectors that insure consistency for inspections conducted by the State? The following elements should be addressed at a minimum. (Review of Procedures, Records, or Field Items to complete a PHMSA UNGS IA Question Set (RESERVOIR or CAVERN) – 2019.12.31) <ul style="list-style-type: none"> <li>• Pre-Inspection Activities</li> <li>• Inspection Activities</li> <li>• Post Inspection Activities</li> </ul> (Yes= 2 points, No= 0 Points, NI=1 point) <b>Comments: Yes. See 60106 Procedures Manual Section IV; and Well Inspector’s Field Manual.</b>	2
3	<b>Integrity Management Inspections</b> <ul style="list-style-type: none"> <li>• Do Integrity Management Inspection procedures give guidance to State inspectors that insure consistency for inspections conducted by the State? The following elements should be addressed at a minimum. (Integrity Testing and Maintenance: Observing Integrity Testing (Tubing, Casing, Cement), reservoir integrity monitoring, &amp; FLIR Camera inspections.)</li> <li>• Pre-Inspection Activities</li> <li>• Inspection Activities</li> </ul> Post Inspection Activities(Yes= 2 points, No= 0 Points, NI=1 point) <b>Comments: Yes. See 60106 Procedures Manual Section IV; and Well Inspector’s Field Manual.</b>	2

4	<p>Design, Testing, and Construction Inspections</p> <p>Do Design, Testing, and Construction Inspection procedures give guidance to State inspectors that insure consistency for Inspections conducted by the State? The following elements should be addressed at a minimum. (Review of procedures, records, and field activities to complete PHMSA UNGS IA Question Set (RESERVOIR or CAVERN CONSTRUCTION) – 2019.12.31. Inspection activities for well design, drilling and completion activities, well workover, reservoir maintenance/repair activities, and abandonment (Plugging and cementing), temporary abandonment, and restoration.)</p> <ul style="list-style-type: none"> <li>• Pre-Inspection Activities</li> <li>• Inspection Activities</li> <li>• Post Inspection Activities</li> </ul> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. See 60106 Procedures Manual Section IV; and Well Inspector's Field Manual.</b></p>	1
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5	<p><b>Wellhead Inspections</b></p> <p>Do Wellhead Inspection procedures give guidance to State inspectors that insure consistency for Inspections conducted by the State? The following elements should be addressed at a minimum.</p> <ul style="list-style-type: none"> <li>• Pre-Inspection Activities</li> <li>• Inspection Activities</li> <li>• Post Inspection Activities</li> </ul> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. See 60106 Procedures Manual Section IV; and Well Inspector's Field Manual.</b></p>	1
6	<p><b>Drug and Alcohol Inspections</b></p> <p>Do Drug and Alcohol Inspection procedures give guidance to State inspectors that insure consistency for Inspections conducted by the State? The following elements should be addressed at a minimum. (Using AI to complete the federal Comprehensive Drug and Alcohol program (Form 3.1.11). Includes time conducting joint inspections with other agencies for this type of inspection.)</p> <ul style="list-style-type: none"> <li>• Pre-Inspection Activities</li> <li>• Inspection Activities</li> <li>• Post Inspection Activities</li> </ul> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. See 60106 Procedures Manual Section IV.</b></p>	1
7	<p>Does inspection plan address inspection priorities of each inspection unit, based on the following elements?</p> <ul style="list-style-type: none"> <li>• <b>Length of time since last inspection (Within five-year interval per inspection unit)</b></li> <li>• <b>Operating history of operator/unit and/or location (includes leakage, incident, Integrity Testing, and compliance activities)</b></li> <li>• <b>Type of activity being undertaken by operators in inspection units (i.e. construction)</b></li> <li>• <b>Locations of operator's inspection units being inspected - (Geographic area, Population Density, etc.)</b></li> <li>• <b>Process to identify high-risk inspection units considering integrity threats</b></li> </ul> <p>Are inspection units broken down appropriately?(Yes= 5 points, No= 0 Points, NI=1-4 points)</p> <p><b>Comments: Yes. See Chapter IV, Section C. See Attachment 2 for the current risk ranking summary. Also see the 'Risk Ranking 2021' spreadsheet in 'PHMSA' folder. Risk ranking will be reviewed annually and mitigating changes will be noted.</b></p>	5
8	<p><b>General Comments: Part B scored 14 of 14 points.</b></p>	14

C – PROGRAM PERFORMANCE		
1	<p>Was ratio of Total Inspection Person-Days to Total Person-Days acceptable? (Chapter 4.2)</p> <p><b>A = Total Inspection Person Days (Attachment 2)</b>  <b>B = Total Inspection Person Days Charged to the program</b>  <b>(220 x Number of Inspection person years from Attachment 7)</b>  <b>Ratio = A/B      If Ratio &gt;= .38 then score = 5 points. If Ratio &lt; .38 then score = 0 points.</b>          (Yes= 5 points, No= 0 Points)  <b>Comments: Yes, 212.065 inspection days, 1.03 inspector years, 212.065/1.03*220=.936 okay.</b></p>	5
2	<p>Has each Inspector and Program Manager fulfilled the TQ Training Requirements? (See Guidelines Appendix C for requirements and Chapter 4.3.1)          (Yes= 5 points, No= 0 Points, NI=1-4)  <b>Comments: Yes. All 5 inspectors (including the Program Manager) have completed TQ UNGS Training.</b></p>	5
3	<p>Does State use the PHMSA Inspection Assistant (IA) program to document inspections? (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes, Inspections from 2019-2021 are in IA.</b></p>	2
4	<p>Did records and discussions with Program Manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1          (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes. Ernest has been the Program Manager since 2019 and demonstrates competence in this position.</b></p>	2
5	<p>Did State respond to PHMSA's Evaluation Letter within 60 days and correct or address any noted deficiencies? Chapter 8.1          (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes. 12/2/21 to 1/12/22 all good. All deficiencies were addressed.</b></p>	2
6	<p>Did State inspect all types of operators and inspection units in accordance with time intervals established in their written procedures? Chapter 5.1          (Yes= 5 points, No= 0 Points, NI=1-4 points)  <b>Comments: Yes, on a 5-year inspection cycle for initial inspections and thereafter, with the exception of wellhead inspections being required annually.</b></p>	5
7	<p>Did State Inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Chapter 5.1          (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes. The appropriate modules in the UNGS IA form are being used.</b></p>	2
8	<p>Did State complete all applicable portions of inspection forms?          (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes. The IA form questions are being answered.</b></p>	2
9	<p>Has the State reviewed Operator Annual reports, along with Incident reports, for accuracy and analyzed data for trends and operator issues?          (Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes. The annual reports have been downloaded, disaggregated, and studied for trends and missing information. There have been no incidents.</b></p>	2

10	<p>Is the State verifying operators are conducting drug and alcohol tests required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199</p> <p>(Yes= 2 points, No= 0 Points, NI= 1 point)</p> <p><b>Comments: Yes. Okay for 2021. Discussed the 5-year limit for D&amp;A inspections and the need to get them done in 2022. Explored options for D&amp;A and Section 114 with IL CC.</b></p>	2
11	<p>Does the State have a mechanism for communicating with stakeholders regarding the inspection and enforcement program? (This should include making enforcement cases available to public).</p> <p>(Yes= 1 points, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes, IL OOGRM has a website that includes contact information, regulations, and forms; IL OOGRM has operator contact information and communicates needed information to the operators; IL OOGRM has an open-door policy.</b></p>	1
12	<p>Did State execute appropriate follow-up actions to Safety Related Condition Reports (SRCR)? Chapter 6.3</p> <p>(Yes= 1 points, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA. No SRCs in this program's history.</b></p>	NA
13	<p>Did the State participate in/respond to surveys or information requests from PHMSA?</p> <p>(Yes= 1 points, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes, IL OOGRM responds to PHMSA requests.</b></p>	1
14	<p>Did the State forward any potential waivers/special permits to PHMSA for review prior to issuing them to operators?</p> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA, there are none. New Partner effective 2018.</b></p>	NA
15	<p>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.</p> <p>(Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: NA, there are none. New Partner effective 2018.</b></p>	NA
16	<p><b>General Comments: Part C scored 31 of 31 points. 3 questions, #12, 14, &amp; 15, were NA.</b></p>	31

D – COMPLIANCE ACTIVITIES		
1	<p>Does the State have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1</p> <ul style="list-style-type: none"> <li>• Procedures to notify an operator (company officer) when a noncompliance is identified (60105 States)</li> <li>• Procedures to routinely review progress of compliance actions to prevent delays or breakdowns</li> <li>• Procedures regarding closing outstanding probable violations</li> </ul> <p>(Yes= 4 points, No= 0 Points, NI=1-3 points)  <b>Comments: Yes, see IL OGRM Administrative Rule 62-240, Sub Part A, Sections 240.125-240.186; also Section 240.1854.</b></p>	4
2	<p>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</p> <ul style="list-style-type: none"> <li>• Were compliance actions sent to company officer or manager/board member if municipal/government system (60105 States)?</li> <li>• Document probable violations</li> <li>• Resolve probable violations</li> <li>• Routinely review progress of probable violations</li> </ul> <p>(Yes= 4 points, No= 0 Points, NI=1-3 points)  <b>Comments: Yes. Communication with Operators is well established, and contact with PHMSA, Eastern Region, for UNGS enforcement actions, has improved. One NOPV with 14 UNSATS is in process. Concerns &amp; UNSATS are documented.</b></p>	4
3	<p>Did State within 30 days of the end of an inspection conduct a post-inspection briefing with the owner or operator of the UNGS facility inspected outlining any concerns identified during the inspection?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes, there is a 'Post Inspection Briefing' performed at the close of every inspection.</b></p>	2
4	<p>Did State within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: Yes, the Exit interview is reviewed and Written Preliminary Findings are emailed to the operator typically within 45 days.</b></p>	2
5	<p>Did the State issue compliance actions for all probable violations discovered (60105 States)?</p> <p>(Yes= 2 points, No= 0 Points, NI=1 point)  <b>Comments: NA, is a 60106 partner. They have issued violations of State regulations. They have also identified concerns and unsatisfactory items while performing federal UNGS inspections and have forwarded them to PHMSA for handling.</b></p>	NA
6	<p>Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary (60105 States).</p> <p>(Yes= 2 points, No= 0 Points)  <b>Comments: NA, is a 60106 Partner. Good communication is established with operators and the Eastern Region, PHMSA.</b></p>	NA



7	<p>Is the Program Manager familiar with State process for imposing civil penalties (60105 States)? (describe any actions taken) (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: NA, is a 60106 partner. IL DNR staff is familiar with the process for imposing civil penalties.</b></p>	NA
8	<p>Were civil penalties considered for repeat violations, violations which can't be corrected by other means, or violations resulting in incidents (60105 States)? (Yes= 2 points, No= 0Points, NI=1 point)</p> <p><b>Comments: NA, is a 60106 partner.</b></p>	NA
9	<p>Can the State demonstrate it is using their enforcement fining authority for safety violations (60105 States)? (Yes= 1 point, No= 0 Points, NI= .5 point)</p> <p><b>Comments: NA, is a 60106 partner.</b></p>	NA
10	<b>General Comments: Part D scored 12 of 12 points. Questions 5 - 9 were NA.</b>	21

E – INCIDENT INVESTIGATIONS		
1	<p>Does the State have written procedures to address State actions in the event of an incident? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: Yes, it is in the General Field Manual which is referenced by the UNGS Procedures Manual.</b></p>	2
2	<p>Does State have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: Yes, see IL DNR Regulations Sections 240.1853, 24.1854, &amp; 240.1880. See Form OG 21A and others.</b></p>	2
3	<p>Did the State keep adequate records of Incident notifications received? (Yes= 2 points, No= 0 Points, NI=1 point)</p> <p><b>Comments: NA, none. It would be kept electronically as a sub-part of the Operator file and in the Enforcement File if a violation was found.</b></p>	NA
4	<p>If onsite investigation was not made, did State obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 (Yes= 1 point, No= 0 Points, NI= .5 point)</p> <p><b>Comments: NA, none. Per Field Procedures manual all incidents that meet State criteria for reporting, (see Section 240.1880) must be on-site investigated within 48 hours. Per 240.1805 the IL definition of ‘incident’ is more stringent than the Federal definition of ‘significant incident’.</b></p>	NA
5	<p>Were all incidents investigated, thoroughly documented, and with conclusions and recommendations?</p> <ul style="list-style-type: none"> <li>• Observations and document review</li> <li>• Contributing Factors</li> <li>• Recommendations to prevent recurrences where appropriate</li> </ul> <p>(Yes= 3 points, No= 0 Points, NI=1-2 points)</p> <p><b>Comments: NA, none. No incidents for the life of this partnership, 2018-8/25/2022.</b></p>	NA
6	<p>Did the State initiate compliance action for violations found during any incident investigation? (60106 States forward violations to PHMSA) (Yes= 1 point, No= 0 Points)</p> <p><b>Comments: NA, none. No incidents for the life of this partnership, 2018-8/25/2022.</b></p>	NA
7	<p>Did the State assist the 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? (validate report data from operators concerning incidents and investigate discrepancies) Chapter 6 (Yes= 1 point, No= 0 Points, NI= .5 point)</p> <p><b>Comments: NA, none. No incidents for the life of this partnership. They are willing to do so.</b></p>	NA
8	<p>Does State share lessons learned from incidents with PHMSA? (Yes= 1 point, No= 0 Points)</p> <p><b>Comments:</b> <b>NA, none. No incidents for the life of this partnership. They are willing to do so.</b></p>	NA

9	General Comments: Part E scored Part E scored 4 of 4 points. 6 questions, #3-8, are NA.	4
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F – DAMAGE PREVENTION		
1	<p>Did the State inspector verify UNGS operators are following their written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? (API 1171 Section 11.10 Public Awareness and Damage Prevention) (Yes= 2 points, No= 0 Points, NI=1 Point)</p> <p><b>Comments: Yes. The IA question set address Public Awareness and Damage Prevention and verifies excavation, marking, etc.</b></p>	2
2	<p>Did the State encourage and promote practices for reducing damages to all underground facilities to its regulated companies? (Common Ground Alliance Best Practices, support excavation damage prevention legislation, etc.) (Yes= 2 points, No= 0 Points, NI=1 Point)</p> <p><b>Comments: Yes, with the operator. ILCC is the lead with Damage Prevention; will support ILCC as requested.</b></p>	2
3	<p><b>General Comments: Part F scored 4 of 4 points.</b></p>	4

G – FIELD INSPECTIONS		
1	Operator, Inspector, Location, Date and PHMSA Representative <b>Comments: Northern Illinois Gas Corp, opid 13710. Jared Rubsam &amp; Ernest Kierbach. Virtual for the Procedures &amp; Records, Field was at Pecatonica Gas Storage Field, Sites visited included the Moth #208 well, Gustafson #205 &amp; #601 wells, &amp; Ottoson #225. 8/23-25/2022. Patrick Gaume.</b>	
2	Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? (Yes= 1 point, No= 0 Points) <b>Comments: Yes. Several NICOR personnel were present and participated in the inspection.</b>	1
3	Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (Yes= 2 points, No= 0 Points, NI=1 Point) <b>Comments: Yes. IA inspection form for UNGS Reservoirs.</b>	2
4	Did the inspector thoroughly document results of the inspection? (Yes= 2 points, No= 0 Points, NI=1 Point) <b>Comments: Yes. All entries other than 'Sat' were documented. Many Procedure questions were marked 'NC' as they had been addressed in the 2021 Northern Illinois Pontiac Unit inspection. A Field inspection was also performed.</b>	2
5	Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Yes= 1 point, No= 0 Points) <b>Comments: Yes. The Operator had been notified and was ready for the inspections in the Office and Field.</b>	1
6	Did the inspector adequately review the following during the field portion of the State Program Evaluation? <ul style="list-style-type: none"> <li>• Procedures</li> <li>• Records</li> <li>• Field Activities/Facilities</li> <li>• Other (please comment)</li> </ul> (Yes= 2 points, No= 0 Points, NI=1 Point) <b>Comments: Inspection was for Records, Field, and included a few Procedures that were site specific. All items were addressed.</b>	2
7	Did the inspector have adequate knowledge of the UNGS safety program and regulations? (Evaluator will document reasons if unacceptable) (Yes= 2 points, No= 0 Points, NI=1 Point) <b>Comments: Yes. Jared demonstrated professional knowledge and skill in conducting this inspection.</b>	2
8	Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) (Yes= 1 point, No= 0 Points) <b>Comments: Yes. There were 7 items of Concern/Unsat that were discussed during the Exit interview.</b>	1

[illegible]

H - 60106 AGREEMENT STATE (if applicable)		
1	<p>Did the State use the current federal inspection form(s)? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. IA was used in 2021.</b></p>	1
2	<p>Are results documented demonstrating inspection units were reviewed in accordance with State inspection plan? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes, all operators are being visited every year, Risk ranking was adopted and implemented starting in 2020. Communication with Eastern Region, PHMSA is established.</b></p>	1
3	<p>Were all probable violations identified by State referred to PHMSA for compliance action? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. Violations were found in 2021. They were documented in IA and IL OOGRM submitted notices to PHMSA Eastern Region within 60 days.</b></p>	1
4	<p>Did the State immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. Process is in place. No imminent safety hazards in 2021.</b></p>	1
5	<p>Did the State give written notice to PHMSA within 60 days of all probable violations found? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Yes. PHMSA is being notified on all inspections within 60 days regardless of violation status.</b></p>	1
6	<p>Did the State initially submit adequate documentation to support compliance action by PHMSA on probable violations? (Yes= 1 point, No= 0 Points, NI=.5 point)</p> <p><b>Comments: Okay, One NOPV with 14 issues was submitted in 2021.</b></p>	1
7	<p><b>General Comments: Part H 6 of 6 points.</b></p>	6