



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

1200 New Jersey Avenue SE
Washington DC 20590

2021 Hazardous Liquid State Program Evaluation

for

INDIANA UTILITY REGULATORY COMMISSION

Document Legend

PART:

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



2021 Hazardous Liquid State Program Evaluation -- CY 2021
Hazardous Liquid

State Agency: Indiana

Agency Status:

Date of Visit: 05/23/2022 - 06/10/2022

Agency Representative: Michael Neal, Pipeline Safety Division Director
William Boyd, Pipeline Safety Division Director
Dan Novak, Division Manager
Miranda Erich, Pipeline Safety Engineer
Alexander Becerra, Administrative Assistant
Mary Schneider, Data and Reporting Manager
Rich Medcalf, Chief Pipeline Safety Engineer

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

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

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

Rating:

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

INSTRUCTIONS:

Complete this evaluation in accordance with the Evaluator Guidance for conducting state pipeline safety program evaluations. The evaluation should generally reflect state program performance during CY 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 0
15 15
10 10
50 50
15 15
6 6
0 0

TOTALS

96 96

State Rating

100.0

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- 1 Were the following Progress Report Items accurate? (*items not scored on progress report) Info Only Info Only
Info Only = No Points
- a. Stats On Operators Data - Progress Report Attachment 1
 - b. State Inspection Activity Data - Progress Report Attachment 2
 - c. List of Operators Data - Progress Report Attachment 3*
 - d. Incidents/Accidents Data - Progress Report Attachment 4*
 - e. Stats of Compliance Actions Data - Progress Report Attachment 5*
 - f. List of Records Kept Data - Progress Report Attachment 6 *
 - g. Staff and TQ Training Data - Progress Report Attachment 7
 - h. Compliance with Federal Regulations Data - Progress Report Attachment 8
 - i. Performance and Damage Prevention Question Data - Progress Report Attachment 10*

Evaluator Notes:

- a. Jurisdictional authority is only on one operator. Information was found correct and verified in PHMSA Portal.
- b. Number of inspection person days were met. Total inspection person days performed was 34.
- c. Verification of operator name and ID number matched Attachment 1 & 3.
- d. One incident reported for CY2021. No issue and checked in Portal.
- e. No violations cited nor compliance action taken in CY2021.
- f. A review of records appears to be correct.
- g. Reviewed TQ training records and verified 3 inspectors have attend classes. Inspector categories are as follows: 1-Cat I, & 2-Cat II.
- h. They have not adopted civil penalty amount of \$100,000 to \$1 Million. Current penalty amount is \$25,000 per day up to \$1 million for a series of violations. A loss of four points occurred on the progress report review. Additionally, a loss of three points occurred due to not taking steps to adopt 7/1/20 Safety of HL Rule. Working to adopt 4/23/19 D&A Amendment and Technical Corrections.

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



PART B - Program Inspection Procedures

Points(MAX) Score

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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 Inspectionsb. IMP Inspectionsc. OQ Inspectionsd. Damage Prevention Inspectionse. On-Site Operator Trainingf. Construction Inspections (annual efforts) | | |

Evaluator Notes:

- a. Yes, these inspections are listed in Indiana Utility Regulatory Commission (IURC) Pipeline Safety Program Manual (PSPM) Section B, Inspection Planning, pages 1-16.
- b. Yes, these types of inspections are listed in Indiana Utility Regulatory Commission (IURC) Pipeline Safety Program Manual (PSPM) Section B, Time Intervals for Inspections, page 12.
- c. Yes, located in Indiana Utility Regulatory Commission (IURC) Pipeline Safety Program Manual (PSPM) Section B, Time Intervals for Inspections, page 12.
- d. Yes, this item is listed in Indiana Utility Regulatory Commission (IURC) Pipeline Safety Program Manual (PSPM) Section B, Time Intervals for Inspections, page 12.
- e. This is listed found in Indiana Utility Regulatory Commission (IURC) Pipeline Safety Program Manual (PSPM) Section B, Time Intervals for Inspections, page 12.
- f. Yes, this is listed in Section C, pages 7 & 8.

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| 2 | Do written procedures address inspection priorities of each operator, and if necessary each unit, based on the following elements and time frames established in its procedures? Chapter 5.1
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| | <ul style="list-style-type: none">a. Length of time since last inspectionb. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)c. Type of activity being undertaken by operators (i.e. construction)d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.)e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors)f. Are inspection units broken down appropriately? | | |

Evaluator Notes:

Yes, items a - e are covered in Indiana Utility Regulatory Commission (IURC) Pipeline Safety Program Manual (PSPM). They have an in-depth rank risk program. This document contains all the elements required to rank risk and priorities their inspection visits as listed on pages 11-12 in section B, Inspection Planning. Item f: Yes, a review of inspection units found them broken down correctly.

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| 3 | (Compliance Procedures) Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
| | <ul style="list-style-type: none">a. Procedures to notify an operator (company officer) when a noncompliance is identifiedb. Procedures to routinely review progress of compliance actions to prevent delays or breakdownsc. Procedures regarding closing outstanding probable violations | | |

Evaluator Notes:

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

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

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

Evaluator Notes:

- a. Yes, this is found on pages 1-7 of Indiana Utility Regulatory Commission (IURC) Pipeline Safety Program Manual (PSPM) Section F, Investigation of Incidents.
 - b. Yes, this is found on pages 3-4 of Indiana Utility Regulatory Commission (IURC) Pipeline Safety Program Manual (PSPM) Section F, Investigation of Incidents . The reason to "not go to an incident" is listed on the telephonic report form.
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- 5** General Comments: Info Only Info Only
Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section of the review.

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



PART C - State Qualifications

Points(MAX) Score

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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 IMP Training before conducting inspection as leadc. Root Cause Training by at least one inspector/program managerd. Note any outside training completede. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1) | | |

Evaluator Notes:

- a. A review of TQ records found the following individuals are qualified active hazardous liquid inspectors and completed all required courses: William Boyd and Chuck Weindorf.
- b. The following individuals have completed the courses to be lead on OQ & IM: Dan Novak and Charles Weindorf.
- c. The following inspectors have completed the Root Cause course: Bill Boyd, Howard Friend, Robert Starkey & Charles Weindorf.

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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, Michael Neal was promoted to Pipeline Safety Division Director on December 14, 2021. Mr. Neal has been with IURC for five years and completed all the TQ courses to qualify for Gas Safety Inspector. He has demonstrated a good understanding of the duties of the program manager and pipeline safety regulations.

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

No loss of points occurred in this section of the review.

Total points scored for this section: 10
Total possible points for this section: 10



PART D - Program Performance

Points(MAX) Score

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|---|--|---|---|
| 1 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Construction (did state achieve 20% of total inspection person-days?)f. OQ (see Question 3 for additional requirements)g. IMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Yes, the one hazardous liquid operator was inspected during CY2021. A review of the Program Manager's "Operator Spreadsheet Type Inspections for PHMSA Records Audit 2021" was used to access the inspection reports, letters sent to operators and their response to violations cited and corrected action taken. The following operator was reviewed: Country Mark Refining and Logistics. All inspections were found to be conducted and completed in accordance to IURC schedule cycle. No issues.

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

Evaluator Notes:

Yes, a review of inspection forms located on the agency's share point confirm the forms cover all applicable code requirements. A review of inspection reports performed found an adequate review was performed and the length of the inspections met the person day requirements.

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| 3 | Is state verifying monitoring (Protocol 9/Form15) of operators OQ programs? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals established in the operator's plan. 49 CFR Part 195 Subpart G
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

Yes, a review of inspection reports for Country Mark Refining confirm the agency inspectors are reviewing the company OQ program.

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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 Part 195 Subpart F & G
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| | <ul 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? | | |

Evaluator Notes:

Yes, This is accomplished and required by Indiana Administrative Code 170 IAC 5-3-2 Federal Safety Regulations. All operators are required to provided updated plans and procedures annually in accordance to the Indiana Administrative Code.

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

Evaluator Notes:

These items are covered in the IURC Standard Inspection Form.

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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)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, this item is addressed in the communication letter send to all operators from IURC on June 9, 2021. The letter contains information on PHMSA advisory items.

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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
Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
| | a. Were compliance actions sent to company officer or manager/board member if municipal/government system? | | |
| | b. Were probable violations documented properly? | | |
| | c. Resolve probable violations | | |
| | d. Routinely review progress of probable violations | | |
| | e. Did state issue compliance actions for all probable violations discovered? | | |
| | f. Can state demonstrate fining authority for pipeline safety violations? | | |
| | g. Does Program Manager review, approve and monitor all compliance actions? (note: Program Manager or Senior Official should sign any NOPV or related enforcement action) | | |
| | h. Did state compliance actions give reasonable due process to all parties? Including "show cause" hearing, if necessary. | | |
| | i. Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns | | |
| | j. Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. (Incident investigations do not need to meet 30/90-day requirement) | | |

Evaluator Notes:

- a. Yes a review of correspondence to Country Mark confirm the letter was sent to Kimberly Smock, VP Operations.
 - b. No violations issued in CY2021.
 - c. N/A
 - d. N/A
 - e. N/A
 - f. f. Yes, the three civil penalties issued in CY2020 in the total amount of \$1.769 Million against gas distribution systems.
 - g. Yes, this item is listed in the procedure manual. Inspectors routinely review the inspection reports for follow-up action. Additionally, the program manager and administrative assistant review the reports before they are released.
 - h. Yes, this is addressed in the Commission's rules and regulations.
 - i. Yes, a review of letters and inspection reports reflect the post inspection was conducted via email or telephone conversation with operator representatives.
 - j. Yes, a review of letters and spreadsheet confirm this was provided to the operator within 30 days.
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| 8 | (Accident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations? | 10 | 10 |
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Yes = 10 No = 0 Needs Improvement = 1-9

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

Evaluator Notes:

- a. Yes, IURC Procedures Manual, Section F, Investigation of Incidents on page 3 address this item.
- b. thru f. Yes
- g. No compliance action was necessary. The incident involved a failed gasket/insulator on a full flow valve.
- h. N/A
- i. Yes, information on previous incidents/accidents are shared with state program managers at the NAPS R Central Region Meeting.

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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 |
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- Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Chairman Huston responded to Mr. Zach Barrett's letter dated May 14, 2021, was received on June 11, 2021.

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| 10 | Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5 | Info Only | Info Only |
|-----------|--|-----------|-----------|
- Info Only = No Points

Evaluator Notes:

The last pipeline safety seminar was conducted virtual on July 20, 2021.

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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:

Yes, this item is addressed in the IURC Standard Transmission Inspection Form 01, page 27, question R5.

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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 |
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- Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

This item is addressed in IURC website. Information on communication with stakeholder is found in the News Release section. They attending other pipeline safety meetings with operators and share information about their program.

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

Evaluator Notes:

No safety related condition reports in CY2021.

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

Yes, Program Manager has responded to NAPSR surveys and routinely checks the Work Management system for task to be completed.

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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:

No waivers/special permits have been issued in CY2021.

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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, a review of electronic files and folders found information on inspections and letters were well organized. Additionally, the CRM is listed in their procedures manual as the database to go to to review all inspection reports. No issues of concern.

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| 17 | Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT). Has the state updated SICT data?
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
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Evaluator Notes:

Program Manager is familiar with the process of completing the SICT data. He demonstrated an excellent understanding of the process and made aware of the program during the "New Program Manager" orientation.

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

Reviewed the performance metrics with IURC staff members pertaining to inspection activity, inspection days, damages per 1,000 locate request. No issues.

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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:

Yes, this item was presented at the IURC Pipeline Safety Seminar in previous years. IURC staff continue to have meetings with Vectren, NPSCO and Centre Pointe representatives reviewing their action on this item.

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

No loss of points occurred in this section of the review.

Total points scored for this section: 50
Total possible points for this section: 50

PART E - Field Inspections

Points(MAX) Score

- 1 Operator, Inspector, Location, Date and PHMSA Representative (enter specifics into the comments box below) Info Only Info Only

Info Only = No Points

- What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc)
- When was the unit inspected last?
- Was pipeline operator or representative present during inspection?
- Effort should be made to observe newest state inspector with least experience

Evaluator Notes:

- Operator Qualification Protocol
- 2021
- Yes, Blair Currie, Manager of Pipeline Integrity & Stacey Whoberry, Corrosion Technician
- This was an inspection observation of Rich Medcalf. The inspection was performed on Country Mark Refining and Logistics LLC in Mount Vernon, IN on June 6, 2022

- 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, Rich Medcalf was using IRUC form 25 Operator Qualification Protocol Hazardous Liquids

- 3 Did the inspector adequately review the following during the inspection 10 10

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

- Procedures (were the inspector's questions of the operator adequate to determine compliance?)
- Records (did the inspector adequately review trends and ask in-depth questions?)
- Field Activities/Facilities (did inspector ensure that procedures were being followed, including ensuring that properly calibrated equipment was used and OQ's were acceptable?)
- Other (please comment)
- Was the inspection of adequate length to properly perform the inspection?

Evaluator Notes:

- Yes, an in-depth review of Country Mark procedures and records of individuals who performed covered work was conducted.
- Records were checked and reviewed.
- Observed the inspector monitoring Stacey Whoberry taking pipe-to-soil potential readings on the supply line and castings at different locations on Country Mark pipeline in the Mount Vernon area.
- Yes

- 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, Rich Medcalf demonstrated an excellent knowledge and understanding of the pipeline safety regulations. He was very thorough in his review of the operator's records and documentation on the operator qualification requirements.

- 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, an exit interview was conducted immediately at the end of the inspection day.

- 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, excellent safety practices were observed during the field activities performed during the inspection.

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

Evaluator Notes:

No loss of points occurred in this section of the review?

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



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|---|--|---|---|
| 1 | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues.
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

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

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| 2 | Has the state verified that the operators analyze excavation damages for the purpose of determining root causes and minimizing the possibility of a recurrence? (192.617)
Has the state verified that the operators have appropriately identified excavators who have repeatedly violated one-call laws and damaged their facilities. Have the operators taken steps to mitigate that risks? (192.1007)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, IURC investigates excavation damages that occur on all natural gas companies facilities. The operator is required to submit a report of damages to the agency in determining the root cause of the damage. IRUC reviews and investigate the damage report and makes a recommendation to the Underground Plant Protection Advisory Committee (UPPAC) on who caused the damage(s). The UPPAC reviews the investigation reports and renders a decision to issue a "Warning Letter", "Re-Training" or civil penalty to the contractor or operator. Excavators who have repeatedly violated the one-call law is addressed in IC 8-1-26. In 2021, 1,950 damages were investigated. 511 warning letters were issued. 435 mandatory trainings were conducted and 828 civil penalties in total amount of \$1.5 million was assessed.

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

Evaluator Notes:

a. Yes this is accomplished by comparing the CRM Data program to the operator's individual reports on damages that occurred on the system.
b. Yes, IURC staff reviews the operator's investigation reports and other data to confirm the cause of damages.
c. Yes, IURC staff reviews these items during a review of the operator's investigation reports and other data in the annual report. Part of the review includes those items listed in Part D of the operator's annual report.
d thru j. Yes, the operator or their contractor locators are OQ qualified. This item is checked on each inspection and reviewed when a damage report is submitted to their agency for review. Yes, operators are continually requalifying locators who have failed to locate correctly. This is reviewed and discussed with the operator at meetings. In accordance to data collected by IURC for CY2021 the number of damages resulting from mismatch was 298 out of 540. Facility could not be found was 41, incorrect facility records was 95, locating practices not sufficient 73, locator error 132 and site marked incomplete 4.

4	Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests?	2	2
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Yes = 2 No = 0 Needs Improvement = 1

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

Evaluator Notes:

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

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

Evaluator Notes:

No loss of points occurred in this section of the review.

Total points scored for this section: 6
Total possible points for this section: 6



PART G - Interstate Agent/Agreement States

Points(MAX) Score

- 1 Were all inspections of interstate pipelines conducted using the Inspection Assistant program for documenting inspections? Info Only Info Only
Info Only = No Points

Evaluator Notes:

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

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

Evaluator Notes:

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

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

Evaluator Notes:

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

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

Evaluator Notes:

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

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

Evaluator Notes:

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

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

Evaluator Notes:

No loss of points occurred in this section of the review.

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