



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

PUBLIC UTILITIES COMMISSION OF OHIO

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: Ohio

Agency Status:

Date of Visit: 06/13/2022 - 06/17/2022

Agency Representative: Joe Dragovich, Program Manager Gas Pipeline Safety Section
Thomas E. Stikeleather, Service Monitoring & Enforcement Department
Christopher Domonkos, Utility Specialist 2

PHMSA Representative: Glynn Blanton, State Evaluator PHP-50

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

Name/Title: Jenifer French, Chair
Agency: Public Utilities Commission of Ohio
Address: 180 East Broad Street
City/State/Zip: Columbus, OH 43215-3793

Rating:

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

INSTRUCTIONS:

Complete this evaluation in accordance with the Evaluator Guidance for conducting state pipeline safety program evaluations. The evaluation should generally reflect state program performance during CY 2021 (not the status of performance at the time of the evaluation). A deficiency in any one part of a multiple-part question should be scored as "Needs Improvement." Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the appropriate notes/comments section. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and they OBJECTIVELY reflect the state's program performance for the question being evaluated. Increasing emphasis is being placed on how the state pipeline safety programs conduct and execute their pipeline safety responsibilities (their performance). This evaluation, together with selected factors reported in the state's annual progress report attachments, provide the basis for determining the state's pipeline safety grant allocation.

Scoring Summary

PARTS

Possible Points Points Scored

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

0
15
10
50
15
10
0

0
15
10
49
15
10
0

TOTALS

100 99

State Rating

99.0

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. Public Utilities Commission of Ohio (PUCO) is a 60105 & Interstate agency. Jurisdictional authority, number of operators and units inspected were found correct and verified via PHMSA Portal.
- b. Number of inspection person days 1,582 meet the minimum requirement. Construction days of 345.2 exceeded the 238 required number. Total drug & alcohol inspections were 12 person days.
- c. Operator's names and ID numbers in PHMSA Portal match attachment 1 & 3.
- d. Five incidents were reported by PUCO on attachment 4 for CY2021. The incidents match the number in PHMSA Portal.
- e. Number of carry over violations has increased to 75. Fifteen compliance actions were taken and three civil penalties assessed and collected. Dollars collected in CY2021 was \$500,000.
- f. A review of list of records appears to be correct.
- g. A review of TQ Blackboard crystal report found 9 inspectors are gas qualified. Three inspectors are category I, five category II and 1 category III. Four inspectors are Gas IM qualified. Four inspectors have completed the root cause course.
- h. PUCO has adopted all federal regulations.
- i. Good information was provided on planned and past performance.

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



- | | | | |
|---|---|---|---|
| 1 | Do written procedures address pre-inspection, inspection and post inspection activities for each of the following inspection types: Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <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:

- a. Yes, Standard Inspection is listed on page 10 of PUCO 2021 Gas Pipeline Safety Inspection Plan under the heading "Conducting Inspections".
- b. Yes, TIMP & DIMP Inspections procedures are listed on page 10.
- c. Yes, OQ Inspection procedures are listed on page 10.
- d. Yes, Damage Prevention Inspection procedures are included in the Standard Inspection on page 10.
- e. Yes, this is listed on pages 9 & 20.
- f. Yes, Construction Inspection procedures are listed on page 11.
- g. N/A. PUCO has jurisdictional authority but no LNG facilities in the State of Ohio.

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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:

Yes, items a to e are listed on page 4 of 2021 PUCO Pipeline Safety Inspection Plan that states: Ohio uses a process for prioritizing inspections that considers the following:

- ? Operator size (data analysis shows larger operators tend to have a higher relative incident risk).
- ? Prior compliance performance of operators, including both the number and severity of past non-compliances and the number, nature and age of outstanding issues that remain open.
- ? Prior history of reportable incidents.
- ? Data from annual reports including pipe mileage and HCA mileage, pipe age and type, leak history, and dig-ins per 1,000 locates.
- ? Amount of time since a previous inspection.
- ? Pipeline system expansion (new construction, acquisition, etc.)
- f. Yes, inspection units are listed on page 2 and 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 identified | | |

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

Evaluator Notes:

- a. Yes, written procedures to identify notification of non-compliance are located on page 17 of 2021 PUCIO Pipeline Safety Inspection Plan under sub-title, "Enforcement Procedures".
- b. Yes, written procedures to routinely review progress of compliance action is listed on page 18.
- c. Yes, written procedures to routinely review progress of compliance action is listed on page 18.

4	(Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident?	3	3
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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, mechanism to receive and respond to incidents reported by the operator are located on page 12 of 2021 PUCO Pipeline Safety Plan under sub-title "Incident Investigation".
- b. Yes, this item is described on page 12 under the sub-title, Assigning Incident and Outage Investigations.

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

Evaluator Notes:

No loss of points occurred on 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

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

A review of TQ Blackboard report found all inspectors are gas qualified. Three inspectors are category I, six category II and 1 category III. Four inspectors are Gas IM qualified. Four inspectors have completed the root cause course.

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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:

Mr. Joe Dragovich has completed all required training at TQ. He has demonstrated a good working knowledge of the responsibilities of the Program Manager position in the last year. Previously, he was with the Ohio Environmental Protection Agency and PUCO as a Gas Pipeline Safety Compliance Investigator. Mr. Dragovich has ten years of experience with the State of Ohio.

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

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

- | | | | |
|---|---|---|---|
| 1 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. Construction (did state achieve 20% of total inspection person-days?)g. OQ (see Question 3 for additional requirements)h. IMP/DIMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Random generated operators to be checked for this evaluation period consisted of 8 distribution, 6 transmission & 3 gas gathering operators. A review of data provided by Program Manager on inspections performed on each operator was checked and found time intervals were met in accordance to PUCO procedures to at least once every 2 calendar years.

Reviewed the following standard inspection reports: Village of Williamsport dated 10/01/2020; City of Lancaster Municipal Gas dated 04/27/21; Pike Natural Gas Company dated 07/02/20; Suburban Natural Gas Company -Unit: Cygnet dated 08/19/21; -Unit: Delaware 03/30/21; Swickard Gas Company dated 10/12/21; Orwell Trumbull Pipeline Company 07/08/19; Ross Energy 09/08/21; The Village of Obetz 09/24/21.

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|---|---|----|----|
| 2 | Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1. Do inspection records indicate that adequate reviews of procedures, records and field activities, including notes and the appropriate level of inspection person-days for each inspection, were performed?
Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. Constructiong. OQ (see Question 3 for additional requirements)h. IMP/DIMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Yes, PUCO inspection forms cover all federal and state code requirements. A review of inspection reports for this evaluation period consisted of the following and found to be complete with all applicable portions of the inspection form filled out correctly.

Distribution: Village of Williamsport; City of Lancaster Municipal Gas; Pike Natural Gas Company; Suburban Natural Gas Company; Swickard Gas Company; Orwell Trumbull Pipeline Company; Ross Energy & The Village of Obetz.

Transmission: Guardian Lima, WMRE of Ohio-American, Linde, Equitrans Midstream Corporation, Columbia Gas of Ohio & Tait Electric Generating Station, LLC.

Gas Gathering: UGI Energy Services, Antero Midstream Corporation & Ohio Gathering Company, LLC.

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|---|--|---|---|
| 3 | Is state verifying monitoring (Protocol 9/Form15) of operators OQ programs? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals established in the operator's plan. 49 CFR 192 Part N
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, a review of database confirm PUCO is using Headquarters Inspection form, 22.1, to check the operator's OQ plan. Detailed information is listed in "Operator Qualification" page 24.

- 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
- a. Are the implementation plans of the state's large/largest operators(s) being reviewed annually to ensure they are completing full cycle of the IMP process?
 - b. Are states verifying with operators any plastic pipe and components that have shown a record of defects/leaks and mitigating those through DIMP plan?
 - c. Are the states verifying operators are including low pressure distribution systems in their threat analysis?

Evaluator Notes:

- a. Yes, PUCO is using Inspection Assistant for DIMP inspections. Two of the largest operator(s) plans were reviewed in 2021. The other two operators are scheduled for review in CY2022.
- b. Yes, this is listed on the Headquarters' Inspection under Failure Investigation procedures of the form on page 13.
- c. Yes, they have used the Low Pressure Gas System Survey Form to monitor the operator's threat analysis.

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- 5 Did the state review the following (these items are NTSB recommendations to PHMSA that have been deemed acceptable response based on PHMSA reviewing these items during the evaluation process): Chapter 5.1 2 2
- Yes = 2 No = 0 Needs Improvement = 1
- a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken;
 - b. Operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance);
 - c. Operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21;
 - d. Operator records of previous accidents and failures including reported third-party damage and leak response to ensure appropriate operator response as required by 192.617;
 - e. Directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies;
 - f. Operator procedures for considering low pressure distribution systems in threat analysis?
 - g. Operator compliance with state and federal regulations for regulators located inside buildings?

Evaluator Notes:

- a. Yes, operator procedures for determining if exposed cast iron was examined for graphitization is located in PUCO Headquarter form on page 12. Section question 192.459.
- b. Yes, surveillance of cast iron pipelines is found on page 18, question 192.613
- c. Yes, operator emergency response procedures is found on page 24 question (192.615)
- d. Yes, this item is located on page 18 question (192.617)
- e. Yes, located on page 27 question (192.614)
- f. Yes, located in the Low Pressure system survey document.
- g. Yes, this item is listed in the PUCO Headquarters' inspection form page 8 (192.353)

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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:

- Yes, PUCO checks this item with the operator in the section entitled, Annual Updates and Reviews, of the Gas Distribution System Inspection Report form.

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

- 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 2021 PUCO Progress Report found 15 compliance actions taken, 3 civil penalties assessed and collected \$500,000. Violations cited 67 and number to be corrected at end of year was 75. Conducted a review of the compliance letters to verify they were sent to company officers. The following letters were reviewed: 1.Dominion Energy Ohio dated 01/15/21; 2.Foraker Gas Company dated 03/24/21; 3.Duke Energy Ohio dated 02/09/21; 4.Northeast Ohio Natural Gas Company 01/22/21; 5.Dominion Energy Ohio 02/10/21; 6.Dominion Energy Ohio 03/05/21; 7.Ironton Metropolitan Housing Authority 03/05/21; 8.Dominion Energy Ohio 03/24/21; 9.Columbia Gas of Ohio 09/08/21; 10. Dominion Energy Ohio 10/14/21; 11. Duke Energy Ohio 10/28/21; 12. Northeast Ohio Natural Gas 11/29/21; 13. Dominion Energy Ohio 12/03/21; 14. Columbia Gas of Ohio 12/30/21; 15. Columbia Gas of Ohio 12/30/21
- b. Yes, each letter listed probable violations and corrected action to be taken.
- c. Yes, probable violations were resolved with an order or plan of action.
- d. Yes, all probable violations are reviewed in the database program. Each month a reminder is provided to each inspector requesting the status of the violation(s). The response is entered into the database.
- e. Yes, compliance action was taken on the fifteen non-compliance letters.
- f. Yes, the three civil penalties collected from Columbia Gas of Ohio and Foraker Gas Company in the amount of \$550,000 in CY2021.
- g. g. Yes, Program Manager routinely reviews and approves all compliance letters.
- h. Yes, due process is provided in accordance to PUCO rules and regulations.
- i. Yes, a review of inspection reports clearly demonstrated an exit interviews were conducted at the end of the inspection audit.
- j. Yes, a review of inspection reports and compliance letters demonstrated written findings were well documented and provided to the operator within 90 days from the inspection date.

8	(Incident 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, PUCO Gas Pipeline Safety Inspection Plan pages 9, 12 & 14 list the mechanism to receive and respond to incidents from operators.
- b. Yes, a review of PUCO database on Telephonic Notice of Incident & Service Failures confirm adequate records are maintained.
- c. Yes, a decision to not go on-site to investigate an incident is documented in the "Telephonic Notice of Incidents and Service Failures" form. This information is stored in their PUCO database.
- d. e., & f. Five incidents listed on 2021 PUCO Progress Report attachment 4. All incident reports were reviewed and found to be well documented with findings facts.
- g. No compliance action or violations were found on the five incidents that occurred in CY2021.
- h. Yes, PUCO continue to keep AID informed on all issues related to the incidents.
- i. Yes, information on the incidents is shared at the NAPSAR Eastern Region Meeting.

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

The Chairman's response letter to Zach Barrett was not signed or mailed within the 60 day requirement. A loss of one point occurred on this question.

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

Yes, PUCO 2020 Virtual Pipeline Operator Training Seminar was held on October 29 & 30, 2020.

11	Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission? Info Only = No Points	Info Only	Info Only
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Evaluator Notes:

Yes, this item is reviewed and checked with the operator during their inspection and found on page 2 of PUCO Headquarters Inspection Form.(192.29)

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

This is accomplished via PUCO website and attending Ohio Gas Association meeting held on March 17-18, 2021.

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

Yes, two safety related condition reports were filed. Columbia Gas of Ohio filed a report on October 5, 2021 pertaining to corrosion leak. The second was on Columbia Transmission Company. The report was filed October 20, 2021 pertaining to a MAOP issue.

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

- a. Yes, Program Manager continues to participate in NAPSRS surveys and State Liaison quarterly meetings. Information was confirmed with information from Robert Clarillos.
- b. Yes, Program Manager and Victor Onameh, Utility Specialist 3, access the WMS and check tasks assignments.

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- | | | | |
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| 15 | If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate.
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

The Waiver submitted by National Gas & CO-OP in 2017 is still open. No other waivers or special permits have been issued.

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| 16 | Were pipeline program files well-organized and accessible?
Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

Evaluator Notes:

Yes.

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

Evaluator Notes:

Program Manager has a good understanding of the SICT on the scoring of inspection days. However, he has not submitted this year's SICT score that is due on July 31, 2022.

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

Evaluator Notes:

A review of this year's performance metrics indicated total leaks repaired was down to 240 from previous year of 257. Hazardous leaks eliminated was up to 105 from previous year of 99. Leaks scheduled for repair was up to 98 from 81 per 1,000 miles.

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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 <ol style="list-style-type: none">a. https://pipelinesms.org/b. Reference AGA recommendation to members May 20, 2019 | Info Only | Info Only |
|-----------|--|-----------|-----------|

Evaluator Notes:

Yes. This is accomplished by training meetings with the operator and discussion about implementation of PSMS. PUCO is using PSMA in their enforcement program letters to operators.

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| 20 | General Comments:
Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

Evaluator Notes:

A loss of one point occurred on Question D.9 of this section of the review.

Total points scored for this section: 49
Total possible points for this section: 50

- 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:

- This was a standard, corrosion control, valve maintenance, odorization and construction inspection.

Operator: Northeast Ohio Natural Gas Corporation representatives:

Sam Hollenbaugh, Director Regulatory Compliance

Norm Kuth - Operator A

Mark Lower - Operations Manager

Personnel that were observed on the regulator project site on June 29th for Northeast Ohio Natural Gas project located at Ohio Star Forge, 4000 Mahoning Ave NW, Warren, Ohio 44483.

Northeast Ohio Natural Gas:

Norm Kuth, Operator A

Eric Wichart, Operator A

Mark Lower, Operations Manager

Mark Callahan, Director of Operations

Sam Hollenbaugh, Director of Compliance

Buckeye Pipeline Construction:

Scott Malmsberry, Welder

Aaron Uhl, Welder Helper

- This unit was last inspected from 09-13-2021 through 09-28-2021.

- Yes, Chris Domonkos, PUCO Lead Gas Pipeline Safety Investigator conducted the inspection on Northeast Ohio Natural Gas Company in Mentor, OH. Dates of the inspections were June 27-29, 2022.

- Mr. Domonkos has not been observed previously by PHMA State Program Evaluators.

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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, observed Mr. Chris Domonkos using the PUCO Gas Distribution System Inspection Report. He recorded items he observed at each of the inspection sites and asked the operator representatives questions about the work that was being performed.

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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:

- Yes, observed Mr. Domonkos asking questions during the field inspections with the operator representatives during the review of regulator stations, emergency valves and odorization testing. Mr. Domonkos checked the calibration dates of each type of equipment the operator was using.
- Mr. Domonkos accessed the operator's records and reviewing data on OQ, corrosion records and valves.

- c. Yes, a very thorough and detailed inspection was performed.
- d. Mr. Domonkos conduct each inspection day in a very professional manner.
- e. Yes, the inspection was of adequate length and covered a large area of operator's service areas.

4	From your observation did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

Yes, Mr. Chris Domonkos has completed all required courses to be a gas inspector and demonstrated excellent knowledge in pipeline safety regulation enforcement. His previous experience in law enforcement and natural gas distribution clearly make him a subject matter expert.

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

Due to the length of the inspection and information needed to complete the inspection, an exit interview was scheduled the follow week with the operator representatives. Mr. Chris Domonkos identified areas of probable violations at the end of each inspection day or site visit.

6	Was inspection performed in a safe, positive, and constructive manner ? Info Only = No Points	Info Only	Info Only
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- a. No unsafe acts should be performed during inspection by the state inspector
- b. What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)
- c. Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)
- d. Other

Evaluator Notes:

- a. Yes, at each inspection site safety procedures were followed. This including each individual wearing safety vest, hard hat and eye protection.
 - b. The inspector observed rebuilding of regulator station, welding of pipe flange, observed pressure flow settings of monitor and worker regulators, cathodic protection readings, turning of emergency valves, and odorization readings.
 - c. Yes, best practices were shared with the operator representatives on items of compliance.
-

7	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 evaluation.

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

PART F - Damage prevention and Annual report analysis**Points(MAX) Score**

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

Evaluator Notes:

Annual reports are reviewed and entered into a spreadsheet showing the number of damages occurring on the operator's systems. Additionally, information on the annual report is review with the operator by the inspector on the PUCO Headquarters Inspection form.

- | | | | |
|---|--|---|---|
| 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, information is discussed with the operator during the PUCO Headquarter Inspection. Yes, this is checked on the Gas Distribution System Inspection Report. In the section entitled Damage Prevention Program Procedures the operator is asked to provide answers to the following questions. "Does the operator have a good understanding of the excavation damage risks to their system and have a plan in place to reduce risk?" Yes, Additional question, "Does the operator have a high-risk program?"

- | | | | |
|---|---|---|---|
| 3 | Has the state reviewed the operator's annual report pertaining to Part D - Excavation Damage?
Yes = 4 No = 0 Needs Improvement = 1-3 <ol style="list-style-type: none">a. Is the information complete and accurate with root cause numbers?b. Has the state evaluated the causes for the damages listed under "One-Call Notification Practices Not Sufficient" (Part D.1.a.)?c. Has the state evaluated the causes for the damages listed under "Locating Practices Not Sufficient" (Part D.1.b)? For each operator, does the state review the following?d. Is the operator or its locating contractor(s) qualified and following written procedures for locating and marking facilities?e. Is the operator appropriately requalifying locators to address performance deficiencies?f. What is the number of damages resulting from mismarks?g. What is the number of damages resulting from not locating within time requirements (no-shows)?h. Is the operator appropriately addressing discovered mapping errors resulting in excavation damages?i. Are mapping corrections timely and according to written procedures?j. Has the state evaluated the causes for the damages listed under "Excavation Practices Not Sufficient" (Part D.1.c.)? | 4 | 4 |
|---|---|---|---|

Evaluator Notes:

a, b & c. Yes, this is addressed in the PUCO Headquarter Inspection. PUCO staff review the operator's annual report and root numbers as listed in section "Review of Excavation Damage Records".
d & e. Yes, this is review in the OQ Inspection.
f. Number of damages for the top four operators in CY2021 was 1352
g. Number of damages for the top four operators in CY2021 was 823
h. Yes, this is reviewed with the operator during the DIMP inspection.
i. Yes, operator's are taking action to correct mapping errors when found in a timely manner.
j. Yes, this is reviewed during the annual review of the operator's annual reports.

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

- 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. Per operator: Columbia Gas - third party contractors; Vectron Gas Company- Operator/Public
- b. Yes, a review of inspection report show this was checked with the operators.
- c. Per operator: Columbia Gas - failure to maintain tolerance zone; Vectron Gas Company- not calling in for a locate tickets/homeowners.
- d. Yes, this reviewed with the operator during the damage prevention program review.

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: 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:

Response from PHMSA EA Region: Yes, all inspections were conducted using IA: all planned questions were answered, and required forms complete within IA.

- 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:

Response from PHMSA EA Region: No inspections were planned or conducted independent of a PHMSA team, therefore no probable violations found needed to be reported to PHMSA.

- 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:

Response from PHMSA EA Region: No inspections were conducted independent of a PHMSA team.

- 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:

Response from PHMSA EA Region: No inspections were conducted independent of a PHMSA team.

- 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:

Response from PHMSA EA Region: PHMSA AID coordinated with Ohio on incidents. Ohio provided updates as requested and copied Eastern Region. PHMSA did not direct Ohio to perform failure investigations, therefore none were conducted.

- 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