



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

1200 New Jersey Avenue SE
Washington DC 20590

2022 Gas State Program Evaluation

for

IOWA UTILITIES BOARD

Document Legend

PART:

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



2022 Gas State Program Evaluation -- CY 2022

Gas

State Agency: Iowa

Agency Status:

Date of Visit: 04/17/2023 - 04/21/2023

Agency Representative: Kevin Yearington, Sanel Lisinovic

PHMSA Representative: Joe Subsits

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

Name/Title: Erik Helland, Chairman

Agency: Iowa Utilities Board

Address: 1375 E Court Ave

City/State/Zip: Des Moines, Iowa 50319-0069

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 2022 (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
48
15
10
0

TOTALS

100

98

State Rating

98.0

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

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

Evaluator Notes:

- Attachment 1 lists 111 gas operators 178 units. 7 LDCs 36 units. 50 municipals 50 units, 2 LPG 2 units and 0 master meters. 1 other operator and 1 other unit. This unit is a cooperative cogen system. 42 intrastate transmission operators, 69 units and 5 interstate transmission with 13 units and 2 intrastate LNG 5 units. One Interstate LNG and One unit. A new gathering will be built this year. Iowa is an interstate agent. They use an access data base. The data base is compared with Pipeline Data Mart to confirm pipeline progress report information.
- Iowa had 633 total inspection days. There were 439 required SICT days. There were 92 design and construction days. This was 20% of the SICT Days. Timesheets and tracking sheet are used to determine inspection days. LDCs submit weekly construction inspection schedules.
- Attachment 3 is consistent with attachment 1.
- There were two federally reportable incidents on the progress report. Both events were at Black Hills Energy facilities. 4/22/22 incident in Onawa was a house fire that was determined to be non jurisdictional. There was an 11/16/22 Ocheyedan LNG incident was caused by freezing water causing a relief valve to open.
- Compliance numbers add up correctly. 502 carry over violations plus 282 new violations in 2022 minus 487 violations corrected leaves 297 carry over violations. There were 501 carry over violation from previous progress report. This inconsistency was addressed in the section comments for attachment 5. Iowa uses access data base to track compliance work.
- Records were maintained electronically on an access data base and were readily accessible.
- Iowa has a total staff of 12. Blackboard results matched with the progress report submission. Three new inspectors were hired in 2022.
- Iowa was up to date on rule amendment adoptions. Iowa Adopted (\$100,000/\$1,000,000) penalty amounts.
- Iowa hired three new engineers, reduced outstanding violations from 502 to 297. They also hosted a operator Safety seminar.

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

- | | | | |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 1 | Do written procedures address pre-inspection, inspection and post inspection activities for each of the following inspection types: Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
- a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspections
 - b. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually)
 - c. OQ Inspections
 - d. Damage Prevention Inspections
 - e. On-Site Operator Training
 - f. Construction Inspections (annual efforts)
 - g. LNG Inspections

Evaluator Notes:

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

- a. Procedure for field and records inspection are found in section 5.4.1 of Iowa's procedures. Public awareness found in section 5.4.9. Drug/Alcohol inspections were found in section 5.4.10 and CRM inspections were found in section 5.4.11.
- b. Procedures for TIMP and DIMP integrity inspections are found in section 5.4.6 for TIMP inspections and section 5.4.8 for DIMP inspections.
- c. OQ inspections are found in section 5.4.3.
- d. Damage Prevention activities are described in section 5.4.5.
- e. Operator training is covered in Section 5.4.4. The procedure mention pipeline safety seminars and participation in Iowa one call seminars.
- f. Construction inspections found in section 5.4.2.
- g. LNG inspections are covered in Section 5.4.7.

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|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 2 | Do written procedures address inspection priorities of each operator, and if necessary each unit, based on the following elements and time frames established in its procedures? Chapter 5.1
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
- a. Length of time since last inspection
 - b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)
 - c. Type of activity being undertaken by operators (i.e. construction)
 - d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.)
 - e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors)
 - f. Are inspection units broken down appropriately?

Evaluator Notes:

- a-e Inspection priorities and procedures are addressed in section 4.2. Prioritization considers outstanding compliance issues, system and HCA mileage, length of time since last inspection, operator activities and operator type. The Inspection plan is based on risk prioritization and required inspection intervals.
- f. Inspection units are based on company districts.

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|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 3 | (Compliance Procedures) Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
- a. Procedures to notify an operator (company officer) when a noncompliance is identified
 - b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns

- c. Procedures regarding closing outstanding probable violations

Evaluator Notes:

- a. Procedures to notify operator of probable violations are found in Section 5.5.1.
- b. Compliance follow up activities are found in Section 5.5.2. Violations remain in data base until cleared. Open violations are tracked in data base and checked monthly by the responsible engineer and supervisor.
- c Closure of probable violations is addressed in Section 5.5.3. Probable violations require validation of compliance before closure. Open violations are tracked monthly and forwarded to inspectors by admin staff.

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|----------|------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 4 | (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident? | 3 | 3 |
|----------|------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Yes = 3 No = 0 Needs Improvement = 1-2

- a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports
- b. If onsite investigation was not made, do procedures require on-call staff to obtain sufficient information to determine the facts to support the decision not to go on-site.

Evaluator Notes:

- a. Incident notification is addressed in section 6. IUB is required to be contacted by operators. The State role in investigations is to determine cause and make recommendations to prevent reoccurrences.
- b. State states it will investigate injury and fatality incidents. Memo to support a no go decision is found at the end of section 6.0.

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

Evaluator Notes:

There were no issues with part B.

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



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|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 1 | Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.3 | 5 | 5 |
| | Yes = 5 No = 0 Needs Improvement = 1-4 | | |
| | <ul style="list-style-type: none"> a. Completion of Required OQ Training before conducting inspection as lead b. Completion of Required DIMP/IMP Training before conducting inspection as lead c. Completion of Required LNG Training before conducting inspection as lead d. Root Cause Training by at least one inspector/program manager e. Note any outside training completed f. 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:

Eric Brown, Paul Hansen, Wayne Andersen, Kevin Yearington, Carter Wright, Emily Clapham, Jim Sunermsyer and Larry Preston are not gas qualified yet. Alex Milewski, Dan Oconnor, Darin Tolzin, Dave McCann and Sanel Lisinovic are gas core qualified. Dan OConnor, Darin Tolzin, Dave McCann and Sanel Lisinovic are failure investigation qualified. Two inspectors Larry Preston and Emily Clapham went to boot camp. Paul Hansen will be done in mid June.

- a. Dan Oconnor, Dave McCann and Sanel Lisinovic were OQ qualified.
- b. Dan Oconnor and Dave McCann were gas IMP qualified. DIMP qualified inspectors were Dan Oconnor, Darin Tolzin, Dave McCann and Sanel Liinovic.
- c. Dan Oconnor and Dave McCann are LNG trained.
- d. Dan Oconnor, Dave McCann, and Sanel Lisinovic were root cause trained.
- e. Kevin Looked at outside training but haven't contracted for training.
- f. Inspection review verified that qualified inspectors led inspections in 2022.

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

Evaluator Notes:

Kevin Yearington was program manager for over a year. Kevin used to work on gas municipal systems. He completed the 1250 gas regulation class. Kevin will delegate primary pipeline safety program management duties to Sanel. Sanel worked pipeline safety for 5 years, He has been involved with administrative matters for 3 years. He is T&Q trained.

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

Evaluator Notes:

There were no issues with Section C.

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

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|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 1 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 4 |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
- a. Standard (General Code Compliance)
 - b. Public Awareness Effectiveness Reviews
 - c. Drug and Alcohol
 - d. Control Room Management
 - e. Part 193 LNG Inspections
 - f. Construction (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:

Time intervals between inspections were checked for all operators on the random inspection list.

- a. Stanard inspections were within the five year frequency. Standard inspections were done within two years.
 - b. The previous public awareness inspection frequency exceeded the five year frequency for distribution operators Morning Sun, Wellman Municipal and Montezuma Gas. Public awareness previous inspection frequencies were exceeded for Plymouth energy and US Gypsum.
 - c. Drug and Alcohol inspections were with the required frequencies.
 - d. There was one exceedance of the five year interval of Control Room Inspections of Mid American Energy.
 - e. LNG inspections were within the required three year interval.
 - f. Construction days were achieved. LDC's in Iowa are now sending crew sheets to IUB voluntarily.
 - g. Operator Qualification inspection days were within the required intervals.
 - h. Imp inspection intervals were not met for Winfield Gas TIMP and Montezuma Gas DIMP.
- Some previous inspection intervals of five years were not met. Current inspection intervals were met. This will result in a 1 point deduction.

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| 2 | Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1. Do inspection records indicate that adequate reviews of procedures, records and field activities, including notes and the appropriate level of inspection person-days for each inspection, were performed?
Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|----|
- a. Standard (General Code Compliance)
 - b. Public Awareness Effectiveness Reviews
 - c. Drug and Alcohol
 - d. Control Room Management
 - e. Part 193 LNG Inspections
 - f. Construction
 - g. OQ (see Question 3 for additional requirements)
 - h. IMP/DIMP (see Question 4 for additional requirements)

Evaluator Notes:

- a. IUB uses IA for standard inspections. IA was filled out properly for the inspections that were reviewed.
- b. IUB uses IA for Public Awareness Inspections. IA was filled out properly for the inspections that were reviewed.
- c. Drug and Alcohol inspections are filled out using IA.
- d. IUB uses IA for Control Room Management Inspections. IA was used properly for the inspections that were reviewed.
- e. IUB uses IA for LNG inspections. IA was used properly for the inspections that were reviewed.
- f. Construction work is performed using a state form.
- g. IUB uses IA for Operator Qualification inspections. IA was used properly for inspections that were reviewed.
- h. IUB used IA for TIMP/DIMP inspections. IA was used properly for inspections that were reviewed.

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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:

OQ inspections were performed at required intervals. IA is used for programmatic inspections and protocol 9 verifications. Protocol 9 is performed during all Standard inspections.

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| 4 | Is state verifying operator's integrity management Programs (IMP and DIMP)? This should include a review of plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operator's plan(s). 49 CFR 192 Subparts O and P
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
- a. Are the implementation plans of the state's large/largest operators(s) being reviewed annually to ensure they are completing full cycle of the IMP process?
 - b. Are states verifying with operators any plastic pipe and components that have shown a record of defects/leaks and mitigating those through DIMP plan?
 - c. Are the states verifying operators are including low pressure distribution systems in their threat analysis?

Evaluator Notes:

- a. Large LDC integrity management plans are submitted and reviewed annually. Work assignments are made at meeting at beginning of year to assign reviews. Meetings are conducted with inspectors at end of year to critique the imp plan. An annual review of operator plan meeting is then conducted with specific operators.
- b. Problematic pipe is identified during the DIMP inspection. There is no cast iron or bare steel in Iowa There is no problematic pipe including plastic pipe in Iowa.
- c. Magid sent an email out of 2/12/2020 to inform LDC's of need to include low pressure systems in the DIMP threat analysis. Mid American in Bettendorf is the only low pressure system in Iowa. The Bettendorf low pressure regulation has been upgraded as a result of a system evaluation. It was suggested that a process be developed to ensure that the Bettendorf low pressure system is continually considered in Mid American's DIMP threat analysis.

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

Evaluator Notes:

- a. There is no cast iron in Iowa.
- b. There is no cast Iron in Iowa.
- c. This question was asked on the previous state form.

- d. This question is asked during standard inspection.
- e. This question was asked on the previous state form.
- f. Low pressure advisory bulletin was sent to operators on September 2021. A survey was also submitted to operators. The survey are intended to seek information from operator to determine if the advisory bulletin is applicable to operators. Mid American is the only remaining low pressure system in Iowa. See question 4.
- g. The indoor regulator advisory bulletin was submitted to operators in September 2021. A survey was also submitted to operators. The survey is intended to seek information from operator to determine if the advisory bulletin is applicable to the operators.
- It was suggested to IUB that process be put in place to ensure continual monitoring of applicable NTSB recommendations.

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

Magid sent a survey out on geological concerns to get information on bulletin applicability from operators. The results of the survey were collected and tabulated.

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
	<ul style="list-style-type: none"> a. Were compliance actions sent to company officer or manager/board member if municipal/government system? b. Were probable violations documented properly? c. Resolve probable violations d. Routinely review progress of probable violations e. Did state issue compliance actions for all probable violations discovered? f. Can state demonstrate fining authority for pipeline safety violations? g. Does Program Manager review, approve and monitor all compliance actions? (note: Program Manager or Senior Official should sign any NOPV or related enforcement action) h. Did state compliance actions give reasonable due process to all parties? Including "show cause" hearing, if necessary. i. Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns j. Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. (Incident investigations do not need to meet 30/90-day requirement) 		

Evaluator Notes:

- a. Compliance actions were submitted to the appropriate company official.
 - b. Probable violations were photographed and documented properly.
 - c. Probable violations that were closed were properly documented.
 - d. Progress of probable violations is reviewed and tracked monthly. Monthly reminders of open violations are sent to staff by administrative staff.
 - e. Compliance actions were initiated for all probable violations that were identified.
 - f. There is no evidence of the state demonstrating fining authority. Staff has recommended penalties which were not followed up on. The need for appropriate use of penalties was discussed during the exit interview.
 - g. All compliance actions are reviewed approved and monitored by Kevin.
 - h. State procedures and processes allow for appropriate due process.
 - i. Exit interviews are conducted within a week but usually on the last day of the inspection.
 - j. Compliance letters are submitted within 90 days of the last day of the inspections.
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8	(Incident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations? Yes = 10 No = 0 Needs Improvement = 1-9	10	9
	<ul style="list-style-type: none"> a. Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? b. Did state keep adequate records of Incident/Accident notifications received? 		

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

Evaluator Notes:

There was one Federally reportable incident in 2022. This was a Black Hills LNG overpressure event that occurred on 11/18/2022.

- a. Kevin gets incident notices from state duty officer. Kevin will assign engineer to respond when incident occurs.
- b. A duty officer log has information for all notification's.
- c. A memo would be written. There were no such events in 2022.
- d. A report was not written for the 2022 incident.
- e. A report was not written for the 2022 incident
- f. A report was not written for the 2022 incident.
- g. There were no compliance issues identified as a result of the investigation.
- h. IUB was asked by AID for assistance on one incident. IUB responded to AID's request.
- i. Lessons are shared during staff meetings and Regional NAPSRS meetings.

An investigation report was not written for the Federally reportable incident in 2022. This will result in a one point deduction.

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

Evaluator Notes:

A letter went out on 10/5/2022 letter to Ms Geri Huser. The IUB Response was sent on 11/22/2022 addressing three issues. The response was satisfactory. Geri Huser is chair until the end of April. Erik Helland is the new chair as of May 1, 2023.

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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 = No Points | Info Only | Info Only |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|

Evaluator Notes:

The last seminar was on February Feb 8-9, 2022. The previous seminar was in 2019.

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

Evaluator Notes:

Mapping submissions are required to IUB. Also, the inspector checks NPMS submission status during the standard inspection.

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|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 12 | Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public).
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

The web site contains Information on regulations, one call information, inspection reports, compliance actions, and enforcement actions. The web site is to be modified this year.

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

Evaluator Notes:

There were no SRC's in 2022. This was confirmed by IUB and Pipeline Data Mart.

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

Evaluator Notes:

a. Surveys are filled out by Sunel and Kevin.

b. There were two open WMS items. Both items were non jurisdictional. Kevin was reminded to make sure WMS is up to date.

- 15** If the State has issued any waivers/special permits for any operator, has the state verified 1 1
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

Evaluator Notes:

There were 5 waivers identified in PHMSA's web page. Kevin was informed that he should go over the waivers to determine if they are still valid. He was informed on the process to close waivers. He was also informed that he should ensure that there is a process in place to monitor open waivers where appropriate.

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

Evaluator Notes:

Files were electronic and information appeared readily accessible.

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

Evaluator Notes:

There were no concerns in the 2022 SICT submission. The 2023 submission suggested that IUB ensure that OQ days were accurate and make sure the required construction days are built into the SICT model. Kevin was briefed on these issues.

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

Evaluator Notes:

IUB was directed to the metrics page and metrics were discussed with state personnel. The state was reminded to check this page periodically to gage performance.

- 19** Did the state encourage and promote operator implementation of Pipeline Safety 1 1
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

Evaluator Notes:

SMS is discussed during quarterly meetings with the operator.

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

Evaluator Notes:

There was a two point deductions in this part. One deduction was for performing previous inspections beyond the required five year interval. Another point was deducted for not writing an investigation report for a federally reportable incident.

Total points scored for this section: 48
Total possible points for this section: 50



PART E - Field Inspections

Points(MAX) Score

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

Info Only = No Points

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

Evaluator Notes:

- Observed the standard inspection of the city of Waukee gas system.
- 2021, Standard inspections are conducted every two years.
- Yes
- Dave McCann has nine years experience with IUB and another three years with the Kansas Commission. He was assisted by Paul Hansen who has two years of IUB experience.

- 2 Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

IA was used as the inspection form. A construction project was reviewed during the standard inspection and the state form was used to inspect the construction work.

- 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:

We inspected the field portion of the inspection. procedures and records review were done previously. The inspection was performed at a proper length.

- 4 From your observation did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

The inspectors had good knowledge pipeline safety issues. They asked good questions and made appropriate observations.

- 5 Did the inspector conduct an exit interview, including identifying probable violations? (If inspection is not totally completed the interview should be based on areas covered during time of field evaluation) 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

An exit interview was conducted.

- 6 Was inspection performed in a safe, positive, and constructive manner ? Info Only Info Only

Info Only = No Points

- 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:

The inspection was conducted in a safe manner. The inspector observed reg stations, pipe to soil readings, locating, markers, meter sets, construction work and atmospheric corrosion. The locating task was OQ'd.

7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues with Part E.

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



PART F - Damage prevention and Annual report analysis

Points(MAX) Score

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

Evaluator Notes:

The Appendix D Annual Report data Summary was presented and discussed with IUB personnel.

Sunel reviews annual reports and enters results in a spreadsheet. The review may result in staff review letter.

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

Evaluator Notes:

This is part of the annual review process.

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

Evaluator Notes:

a-j. investigator investigates one call complaints. This information is evaluated during damage prevention investigations and the annual review process. AG does enforcement. Staff assist AG in case development.

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

Evaluator Notes:

- a. Most complaints are with the operator.
- b,d Covered during the Public awareness inspection
- c. Done during damage prevention investigations and annual review.

5 General Comments:

Info Only = No Points

Info Only Info Only

Evaluator Notes:

No issues with part F

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



PART G - Interstate Agent/Agreement States

Points(MAX) Score

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

Evaluator Notes:

Region will complete these questions at the end of the calendar year and forward to Zach Barrett for including any issues in letter to the Chair.

- 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:

Region will complete these questions at the end of the calendar year and forward to Zach Barrett for including any issues in letter to the Chair.

- 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:

Region will complete these questions at the end of the calendar year and forward to Zach Barrett for including any issues in letter to the Chair.

- 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:

Region will complete these questions at the end of the calendar year and forward to Zach Barrett for including any issues in letter to the Chair.

- 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:

Region will complete these questions at the end of the calendar year and forward to Zach Barrett for including any issues in letter to the Chair.

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

Evaluator Notes:

Region will complete these questions at the end of the calendar year and forward to Zach Barrett for including any issues in letter to the Chair.

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