



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

1200 New Jersey Avenue SE
Washington DC 20590

2023 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



2023 Gas State Program Evaluation -- CY 2023

Gas

State Agency: Ohio

Agency Status:

Date of Visit: 11/04/2024 - 11/08/2024

Agency Representative: Joseph Dragovich, Chief- Facilities and Operations Field Division

PHMSA Representative: Agustin Lopez, State Evaluator

Sean Mayo, State Evaluator

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 Sreet

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 2023 (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

0
15
10
50
15
10

0
15
10
48
15
10

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
- a. Stats On Operators Data - Progress Report Attachment 1
 - b. State Inspection Activity Data - Progress Report Attachment 2
 - c. List of Operators Data - Progress Report Attachment 3*
 - d. Incidents/Accidents Data - Progress Report Attachment 4*
 - e. Stats of Compliance Actions Data - Progress Report Attachment 5*
 - f. List of Records Kept Data - Progress Report Attachment 6 *
 - g. Staff and TQ Training Data - Progress Report Attachment 7
 - h. Compliance with Federal Regulations Data - Progress Report Attachment 8
 - i. Performance and Damage Prevention Question Data - Progress Report Attachment 10*

Evaluator Notes:

- a. Reviewed PDM and PUCO files to verify operator data and number of units.
- b. Reviewed inspection time kept by the PUCO to verify inspection days. The PUCO met the SICT inspection days and had above 20% of construction time. Transitioned from ETS to KRONOS to track inspection time.
- c. Reviewed PDM and OH PUC files to verify operator data.
- d. All reportable incidents were investigated and listed in the progress report.
- e. Reviewed compliance data from PUCO to verify number of compliance issued, corrected and carry over. Compliance actions and violations issued were down significantly this year.
- f. Records are kept electronically and are secured.
- g. Verified qualifications with TQ Blackboard.
- h. Have adopted amendments within 2 years.
- i. List past and planned performance goals and damage prevention initiatives.

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



PART B - Program Inspection Procedures

Points(MAX) Score

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|---|---|---|---|
| 1 | Do written procedures address pre-inspection, inspection and post inspection activities for each of the following inspection types: Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none">a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspectionsb. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually)c. OQ Inspectionsd. Damage Prevention Inspectionse. On-Site Operator Trainingf. Construction Inspections (annual efforts)g. LNG Inspections | | |

Evaluator Notes:

Section 4.2 has details on all types of inspections which give guidance to inspectors. Section 5 of Inspection Plan includes pre and post inspection activities to guide inspectors for conducting inspections which include standard, TIMP, DIMP, OQ, Damage Prevention, and CRM.

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

Evaluator Notes:

Section 3.4 addresses inspection priorities which include operator size, compliance history, time since last inspection, system expansion. Section 4.1 establishes intervals for inspections. HQ and records, master meter, propane -2 years; Gathering systems-3 years; IMP, CRM, small operator HQ- 5 years. Suggest to add transmission operators and Section 114 time intervals.

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

Evaluator Notes:

Section 6 of Inspection Plan includes Enforcement Procedures, describes the process of issuing compliance actions due to probable violations found during inspections. Written compliance actions are sent to company officials. Section 6.2 states that inspection documents to be submitted to Program Manager within 14 days of completions of the exit interview. Section 6.5 has 30 day and 90 day verbal and written notice to operators if probable violations are found. Operator has 30 days to respond to notices.

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

- 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:

Section 5.3 Incident Investigations has detailed procedures to guide inspectors in responding and conducting incident investigations. Section 5.3.1 has mechanism for receiving, recording and responding to incident notifications. Operators are required to report Incidents to the United States Coast Guard National Response Center (NRC) within one hour of confirmed discovery (49 CFR 191.5). Operators must also provide a telephonic notice to the Program Manager on all incidents per the Ohio Administrative Code section 4901:1-16-05(A). Suggest to add PM phone number and actual process that is used to receive telephonic reports from operators. Although the law has a dedicated phone number for operators to call, operators are instructed to call PM due to slow response by the answering service.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

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

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



PART C - State Qualifications

Points(MAX) Score

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|---|---|---|---|
| 1 | Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.3
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none">a. Completion of Required OQ Training before conducting inspection as leadb. Completion of Required DIMP/IMP Training before conducting inspection as leadc. Completion of Required LNG Training before conducting inspection as leadd. Root Cause Training by at least one inspector/program managere. Note any outside training completedf. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1) | | |

Evaluator Notes:

Verified with TQ Blackboard to assure inspectors are qualified to lead inspections. Also reviewed randomly selected inspection reports to verify the leads were qualified. There are no jurisdictional LNG facilities in OH.

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

Yes, Mr. Joseph Dragovich is knowledgeable of the pipeline safety program and regulations. He has completed all required TQ courses and has experience in pipeline safety. He was previously an inspector with the PUCO and has been the Program Manager for several years. He was promoted to Chief in 2023.

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

The PUCO is mainly complying to Part C of the evaluation.

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



PART D - Program Performance

Points(MAX) Score

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|---|---|---|---|
| 1 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 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:

Reviewed randomly selected inspection reports to verify inspection intervals were met. There does not seem to be issues in meeting the inspection intervals.

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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 | 9 |
| | <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:

Master Meter inspection forms did not cover entire code requirements for documenting and providing guidance to the inspectors during the inspection of O&M and OQ manuals. The only verification was a check mark stating that the Master Meter operator had the manuals. In addition, the construction form utilized for construction inspections did not include all applicable code requirements necessary to document and provide guidance to inspectors while conducting construction inspections. The PUCO needs to review the forms to assure all code requirements are addressed in the forementioned forms to provide guidance to the inspectors.

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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 |
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Evaluator Notes:

Yes, field inspection forms include an OQ Protocol 9 question set.

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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 |
| | <ul style="list-style-type: none">a. Are the implementation plans of the state's large/largest operators(s) being reviewed annually to ensure they are completing full cycle of the IMP process? | | |

- 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:

Victor Oameh does a TIMP inspeciton meetings every year. DIMP with other HQ items every other year for large operators. Have a check box on standard inspection forms that ask if there have been any changes to the company's DIMP since last year. To improve/better document this review, are implementing a DIMP Check In form this year for any larger operator that don't have DIMP scheduled for that year. Example will be sent and these will be scheduled for Nov./Dec. this year for any large operator that needs it for 2024

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
	<ul style="list-style-type: none"> a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken; b. Operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance); c. Operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21; d. Operator records of previous accidents and failures including reported third-party damage and leak response to ensure appropriate operator response as required by 192.617; e. Directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies; f. Operator procedures for considering low pressure distribution systems in threat analysis? g. Operator compliance with state and federal regulations for regulators located inside buildings? 		

Evaluator Notes:

NTSB questions are addressed throughout the HQ Inspection form with "PHMSA Area of Emphasis" questions.

- a. Question 192.459
- b. Question 192.613
- c. Question 192.605 and .615
- d. Question 192.614 and .615
- e. Question 192.614
- f. Question 192.623
- g. Question 192.353

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:

Question on inspeciton form and also covered at annual Ohio Gas Association Technical Seminar Question 192.615(a)(3) natural disasters covers ADB 22-01.

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:

Reviewed compliance action files and seems that all probable violations found are being addressed. Issue was found with not issuing compliance actions found during incident investigation which is addressed in question D.8. Discussed the need to document whenever the end of an inspection is extended due to waiting on documents from an operator to avoid the 30 day exit interview and 90 day written preliminary findings requirements.

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:

The PUCO needs to improve on issuing compliance actions when probable violations are found during an incident investigation. During the review of incidents, there were a couple of incidents where violations were noted but no compliance actions were issued by the PUCO, specifically Incident Report #20230039 and #20230076. This issue resulted in a 1-point deduction.

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
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Evaluator Notes:

A response was not required.

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:

Last seminar was on December 2023.

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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 |
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Evaluator Notes:

Question is included on our Comprehensive Plans and Programs Inspection Form

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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 |
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Evaluator Notes:

Enforcement cases are available on website. They are also docketed in publicly accessible docketing system for PUCO Cases. Host training every 3 years and attend the OGA Tech Seminar every spring where the program manager speaks. Also attend OGA Code's and Regs committee meetings and talk to the OGA board once a year to give updates and will talk to any other stakeholder group that asks for a speaker at an event.

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| 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:

There were four SRCR in PDM that were all closed by PHMSA.

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

Try to respond to all surveys and requests. May have been some overlap due to the departure of the Chief.

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

NGO waiver is still open but pipe was never installed. Will work with waiver manager to remove old waivers.

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

Yes, files were well organized and accessible.

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

Discussed SICT and need to input risk and data for operators. No issues with current numbers.

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

Discussed Performance Measures with PM. There are not negative trends that seem to be problematic. Do work with operators to reduce damages.

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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 Info Only
Info Only = No Points
- a. <https://pipelinesms.org/>
 - b. Reference AGA recommendation to members May 20, 2019

Evaluator Notes:

Try to use as part of the enforcement to have operators use PSMS to find problems in their operations.

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

Evaluator Notes:

D.2-Master Meter inspection forms did not cover entire code requirements for documenting and providing guidance to the inspectors during the inspection of O&M and OQ manuals. The only verification was a check mark stating that the Master Meter operator had the manuals. In addition, the construction form utilized for construction inspections did not include all applicable code requirements necessary to document and provide guidance to inspectors while conducting construction inspections. The PUCO needs to review the forms to assure all code requirements are addressed in the forementioned forms to provide guidance to the inspectors. This issue resulted in 1 point deduction.

D.8-The PUCO needs to improve on issuing compliance actions when probable violations are found during an incident investigation. During the review of incidents, there were a couple of incidents where violations were noted but no compliance actions were issued by the PUCO, specifically Incident Report #20230039 and #20230076. This issue resulted in a 1 point deduction.

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:

Columbia Gas of Ohio
Victor Omameh-Lead Inspector
Columbus, OH
November6, 2024
Agustin Lopez, State Evaluator
Sean Mayo, State Evaluator

- Evaluated Victor Omameh perform a construction inspection of a transmission pipeline replacement.
- Unit is inspected every year.
- Yes, operator representatives were present.
- Have not observed Victor Omameh while conducting field portion of an inspection.

- 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, a checklist/form is utilized to document the results of inspections.

- 3 Did the inspector adequately review the following during the inspection 10 10
Yes = 10 No = 0 Needs Improvement = 1-9
- Procedures (were the inspector's questions of the operator adequate to determine compliance?)
 - Records (did the inspector adequately review trends and ask in-depth questions?)
 - Field Activities/Facilities (did inspector ensure that procedures were being followed, including ensuring that properly calibrated equipment was used and OQ's were acceptable?)
 - Other (please comment)
 - Was the inspection of adequate length to properly perform the inspection?

Evaluator Notes:

- Reviewed records previously on same construction project. Did review welding procedures.
- Reviewed welding records and OQ records.
- Observed welding and lowering of pipeline. Also inspected condition of pipeline already in trench.
- no other activity.
- Yes, inspection was adequate in length. This is a long project that is inspected throughout the year.

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

Evaluator Notes:

Yes, Mr. Victor Omameh is very knowledgeable of the pipeline safety program and regulations.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, he concluded with an exit interview with the inspector and foreman.

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

Info Only Info Only

Info Only = No Points

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

Evaluator Notes:

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

7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Mr. Victor Omemah performed an excellent inspection and was very thorough.

Total points scored for this section: 15

Total possible points for this section: 15



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

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

Evaluator Notes:

Victor Omameh does a review of the annual reports and puts together reports to show trends every year. This year Dave Appelbaum also provided some comparisons that are following up on.

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

Evaluator Notes:

Duke Energy Ohio Locating Practices not Sufficient percentages have increased in last three years 43%, 46% and 57%. The PUCO needs to improve on assuring the operators are analyzing the cause of damages and finding ways to reduce the recurrence of the same type of damages, either thru enforcement actions, civil penalties or orders.

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

Evaluator Notes:

Have always compared operators records to their annual report. For the 2023 forms, for better documentation, added fields to capture the number of damages reported on the annual report to document that they did review the numbers and compare with operator records.

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

- d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?

Evaluator Notes:

Yes, and inspector is assigned the task, Victor Onameh, compiles and graphs the annual report data every year and shares with the team. Tom Stikeleather also runs various reports/scenarios/graphs to help identify trends.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

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

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

