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

1200 New Jersey Avenue SE
Washington DC 20590

2010 Natural Gas State Program Evaluation

for

PUBLIC UTILITIES COMMISSION OF OHIO

Document Legend
PART:

O -- Representative Date and Title Information
A -- General Program Qualifications
B -- Inspections and Compliance - Procedures/Records/Performance
C -- Interstate Agent States
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E -- Damage Prevention Initiatives
F -- Field Inspection
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2010 Natural Gas State Program Evaluation -- CY 2010

Natural Gas

State Agency: Ohio
Rating:
Agency Status:
60105(a): Yes **60106(a):** No **Interstate Agent:** Yes
Date of Visit: 07/25/2011 - 07/29/2011
Agency Representative: Peter Chace
PHMSA Representative: Leonard Steiner
Commission Chairman to whom follow up letter is to be sent:
Name/Title: Todd A. Snitchler, Chairman
Agency: Public Utilities Commission of Ohio
Address: 180 East Broad Street
City/State/Zip: Columbus, Ohio 43215-3793

INSTRUCTIONS:

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2010 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. 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 then the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual certification/agreement attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART F):

The field inspection form used will allow different areas of emphasis to be considered for each question. Question 13 is provided for scoring field observation areas. In completing PART F, the PHMSA representative should include a written summary which thoroughly documents the inspection.

Scoring Summary

PARTS		Possible Points	Points Scored
A	General Program Qualifications	25	25
B	Inspections and Compliance - Procedures/Records/Performance	24	23
C	Interstate Agent States	6	6
D	Incident Investigations	7	7
E	Damage Prevention Initiatives	9	9
F	Field Inspection	12	12
G	PHMSA Initiatives - Strategic Plan	9	9
H	Miscellaneous	3	3
I	Program Initiatives	8.5	8.5
TOTALS		**103.5**	**102.5**

State Rating **99.0**

PART A - General Program Qualifications

		Points(MAX)	Score
1	Did the state submit complete and accurate information on the attachments to its most current 60105(a) Certification/60106 (a) Agreement? (NOTE: PHMSA Representative to verify certification/agreement attachments by reviewing appropriate state documentation. Score a deficiency in any one area as "needs improvement". Attachment numbers appear in parenthesis) Previous Question A.1, Items a-h worth 1 point each Yes = 8 No = 0 Needs Minor Improvement = 3-7 Needs Major Improvement = 2	8	8

a.	State Jurisdiction and agent status over gas facilities (1)	☒
b.	Total state inspection activity (2)	☒
c.	Gas facilities subject to state safety jurisdiction (3)	☒
d.	Gas pipeline incidents (4)	☒
e.	State compliance actions (5)	☒
f.	State record maintenance and reporting (6)	☒
g.	State employees directly involved in the gas pipeline safety program (7)	☒
h.	State compliance with Federal requirements (8)	☒

SLR Notes:

		Points(MAX)	Score
2	Did the state have an adequate mechanism to receive operator reporting of incidents to ensure state compliance with 60105(a) Certification/60106(a) Agreement requirements (fatality, injury requiring hospitalization, property damage exceeding $50,000 - Mechanism should include receiving "after hours" reports)? (Chapter 6) Previous Question A.2 Yes = 1 No = 0	1	1

SLR Notes:

Yes

		Points(MAX)	Score
3	Has the state held a pipeline safety TQ seminar(s) in the last 3 years? (NOTE: Indicate date of last seminar or if state requested seminar, but T&Q could not provide, indicate date of state request for seminar. Seminars must be held at least once every 3 calendar years.) (Chapter 8.5) Previous Question A.4 Yes = 2 No = 0	2	2

SLR Notes:

Yes, October 2009

		Points(MAX)	Score
4	Were pipeline safety program files well-organized and accessible?(NOTE: This also includes electronic files) (Chapter 5) Previous Question A.5 Yes = 1 No = 0	1	1

SLR Notes:

Yes

		Points(MAX)	Score
5	Did state records and discussions with the state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? (Chapter 4.1, Chapter 8.1) Previous Question A.6 Yes = 2 No = 0 Needs Improvement = 1	2	2

SLR Notes:

Yes

		Points(MAX)	Score
6	Did the state respond in writing within 60 days to the requested items in the Chairman's letter following the Region's last program evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8 Yes = 1 No = 0	1	1

SLR Notes:

Yes

		Points(MAX)	Score
7	What actions, if necessary, did the State initiate as a result of issues raised in the Chairperson's letter from the previous year? Did actions correct or address deficiencies from previous year's evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8/A.9 Yes = 1 No = 0	1	1

SLR Notes:

Ohio has address all items from last year's evaluation. Ohio has hired inspectors to replace empty positions. Ohio has adopted the required amendments. The Commission support travel for training. The Commission is still attempting to have appropiate penalties for One-Call violations.

Personnel and Qualifications

8	Has each inspector fulfilled the 3 year TQ training requirement? If No, has the state been granted a waiver regarding TQ courses by the Associate Administrator for Pipeline Safety? (NOTE: If the State has new inspectors who have not attended all TQ courses, but are in a program which will achieve the completion of all applicable courses within 3 years of taking first course (5 years to sucessfully complete), or if a waiver has been granted by the applicable Region Director for the state, please answer yes.) (Chapter 4.4) Previous Question A.10 Yes = 3 No = 0	3	3

SLR Notes:

Inspectors have completed or are on a schedule to complete the required courses.

9	Brief Description of Non-TQ training Activities: Info Only = No Points	Info Only	Info Only

For State Personnel:

All inspectors attend the Ohio Gas Association techinical seminar.

For Operators:

The program manager gave presentation on codes at Ohio Gas Association meet.

For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:

Gave presentation at Northeast Ohio Plumbers Association meeting about service lines.

SLR Notes:

10	Did the lead inspectors complete all required T&Q OQ courses and Computer Based Training (CBT) before conducting OQ Inspections? (Chapter 4.4.1) Previous Question A.12 Yes = 1 No = 0	1	1

SLR Notes:

Yes

11	Did the lead inspectors complete all required TQ Integrity Management (IMP) Courses/Seminars and CBT before conducting IMP Inspections? (Chapter 4.4.1) Previous Question A.13 Yes = 1 No = 0	1	NA

SLR Notes:

No IM inspections were conducted in cy 2010.

12	Was the ratio acceptable of Total inspection Person-days to Total Person-days charged to the program by state inspectors? (Region Director may modify points for just cause) (Chapter 4.3) Previous Question B.12 Yes = 5 No = 0	5	5

A. Total Inspection Person Days (Attachment 2):

1506.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):

220 X 9.58 = 2108.33

Ratio: A / B

1506.00 / 2108.33 = 0.71

If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0

Points = 5

SLR Notes:

13	Have there been modifications or proposed changes to inspector-staffing levels? (If yes, describe) Previous Question B.13 Info Only = No Points	Info Only	Info Only

SLR Notes:

No proposed changes to authorized staff level.

14	Part-A General Comments/Regional Observations Info Only = No Points	Info Only	Info Only

SLR Notes:

Total points scored for this section: 25
Total possible points for this section: 25

PART B - Inspections and Compliance - Procedures/Records/ Performance

Points(MAX) **Score**

Inspection Procedures

1 Does the State have a written inspection plan to complete the following? (all types of operators including LNG) (Chapter 5.1) Previous Question B.1 + Chapter 5 Changes + Incorporate LNG — 6.5 — 6.5

Yes = 6.5 No = 0 Needs Improvement = 50% Deduction

		Yes	No	Needs Improvement
a	Standard Inspections (Including LNG) (Max points = 2)	◉	○	○
b	IMP Inspections (Including DIMP) (Max points = .5)	◉	○	○
c	OQ Inspections (Max points = .5)	◉	○	○
d	Damage Prevention (Max points = .5)	◉	○	○
e	On-Site Operator Training (Max points = .5)	◉	○	○
f	Construction Inspections (Max points = .5)	◉	○	○
g	Incident/Accident Investigations (Max points = 1)	◉	○	○
h	Compliance Follow-up (Max points = 1)	◉	○	○

SLR Notes:

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2 Did the written Procedures for selecting operators adequately address key concerns? (Chapter 5.1) Previous Question B.2, items a-d are worth .5 point each — 2 — 2

Yes = 2 No = 0 Needs Improvement = 50% Deduction

		Yes	No	Needs Improvement
a	Length of time since last inspection	◉	○	○
b	History of Operator/unit and/or location (including leakage , incident and compliance history)	◉	○	○
c	Type of activity being undertaken by operator (construction etc)	◉	○	○
d	For large operators, rotation of locations inspected	◉	○	○

SLR Notes:

Inspection Performance

3 Did the state inspect all types of operators and inspection units in accordance with time intervals established in its written procedures? (Chapter 5.1) Previous Question B.3 — 2 — 2

Yes = 2 No = 0

SLR Notes:

Yes

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4 Did the state inspection form cover all applicable code requirements addressed on the Federal Inspection forms? (Chapter 5.1 (3)) Previous Question B.4 — 1 — 1

Yes = 1 No = 0

SLR Notes:

Yes

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5 Did state complete all applicable portions of inspection forms? (Chapter 5.1 (3)) Previous Question B.5 — 1 — 1

Yes = 1 No = 0

SLR Notes:

yes

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6 Did the state initiate appropriate follow-up actions to Safety Related Condition Reports? (Chapter 6.3) Previous Question B.6 — .5 — .5

Yes = .5 No = 0

SLR Notes:

Yes. Ohio should contact PHMSA central region about 3 old SRC reports that are still open.

7	Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Previous Question B.7 Yes = .5 No = 0	.5	.5

SLR Notes:

Yes

8	Did the state review 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) (NTSB) Previous Question B.8 Yes = .5 No = 0	.5	.5

SLR Notes:

Yes.

9	Did the state review 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? (NTSB) Previous Question B.9 Yes = .5 No = 0	.5	.5

SLR Notes:

Yes.

10	Did the state review 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? (NTSB) Previous Question B.10 Yes = 1 No = 0	1	1

SLR Notes:

Yes.

Compliance - 60105(a) States

11	Did the state adequately document sufficient information on probable violations? (Chapter 5.2) Previous Question B.14 Yes = 1 No = 0 Needs Improvement = .5	1	.5

SLR Notes:

PUCO needs to improve the information collection of probable violations. The inspection form should state specifically what was need to be done or changed for full compliance.

12	Does the state have written procedures to identify the steps to be taken from the discovery to the resolution of a probable violation as specified in the "Guidelines for State Participating in the Pipeline Safety Program"? (Chapter 5.1) Previous Question D(1).1 Yes = 1 No = 0 Needs Improvement = .5	1	1

SLR Notes:

Yes.

13	Does the state have written procedures to notify an operator when a noncompliance is identified as specified in the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(4)) Previous Question D (1).2 Yes = 1 No = 0 Needs Improvement = .5	1	1

SLR Notes:

yes.

14	Does the state have a written procedure for routinely reviewing the progress of compliance actions to prevent delays or breakdowns of the enforcement process, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(5)) Previous Question D(1).3 Yes = 1 No = 0 Needs Improvement = .5	1	1

SLR Notes:

YES

15	Has the State issued compliance actions for all probable violations discovered? (Note : PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation) Previous Question D(1).4 Yes = 1 No = 0	1	1

SLR Notes:

Yes.

16	Did the state follow its written procedures for reviewing compliance actions and follow-up to determine that prompt corrective actions were taken by operators, within the time frames established by the procedures and compliance correspondence, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? Previous Question D(1).5 Yes = 1 No = 0 Needs Improvement = .5	1	1

SLR Notes:

Yes.

17	If compliance could not be established by other means, did state pipeline safety program staff request formal action, such as a "Show Cause Hearing" to correct pipeline safety violations? (check each states enforcement procedures) Previous Question D(1).6 No = 0 Yes = 1	1	NA

SLR Notes:

No "Show Cause Hearings" were required.

18	Did the state adequately document the resolution of probable violations? (Chapter 5.1 (6)) Previous Question D(1).7 Yes = 1 No = 0 Needs Improvement = .5	1	.5

SLR Notes:

They need to improve the documentation when the probable violation was corrected.

19	Were compliance actions sent to a company officer? (manager or board member if municipal/government system) (Chapter 5.1(4)) Previous Question D(1).8 Yes = .5 No = 0	.5	.5

SLR Notes:

Yes.

20	Did the compliance proceedings give reasonable due process to all parties? (check each states enforcement procedures) Previous Question D(1).9 Yes = 1 No = 0 Needs Improvement = .5	1	1

SLR Notes:

Yes.

Compliance - 60106(a) States

21	Did the state use the current federal inspection form(s)? Previous Question D(2).1 Yes = 1 No = 0 Needs Improvement = .5	1	NA

SLR Notes:

22	Are results adequately documented demonstrating inspection units were reviewed in accordance with state inspection plan? Previous Question D(2).2 Yes = 1 No = 0 Needs Improvement = .5	1	NA

SLR Notes:

23	Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) Previous Question D(2).3 Yes = 1 No = 0 Needs Improvement = .5	1	NA

SLR Notes:

24	Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question D(2).4 Yes = 1 No = 0 Needs Improvement = .5	1	NA

SLR Notes:

25	Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(2).5 Yes = 1 No = 0 Needs Improvement = .5	1	NA

SLR Notes:

26	Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? Previous Question D(2).6 Yes = 1 No = 0 Needs Improvement = .5	1	NA

SLR Notes:

27	Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken) Info Only = No Points	Info Only	NA

SLR Notes:

28	Part B: General Comments/Regional Observations Info Only = No Points	Info Only	NA

SLR Notes:

Total points scored for this section: 23
Total possible points for this section: 24

PART C - Interstate Agent States

	Question	Points(MAX)	Score
1	Did the state use the current federal inspection form(s)? Previous Question D(3).1 Yes = 1 No = 0 Needs Improvement = .5	1	1

SLR Notes:

Yes

	Question	Points(MAX)	Score
2	Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? Previous Question D(3).2 Yes = 1 No = 0 Needs Improvement = .5	1	1

SLR Notes:

Yes

	Question	Points(MAX)	Score
3	Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? Previous Question D(3).3 Yes = 1 No = 0	1	1

SLR Notes:

Yes

	Question	Points(MAX)	Score
4	Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) Previous Question D(3).4 Yes = 1 No = 0	1	1

SLR Notes:

Yes

	Question	Points(MAX)	Score
5	Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question D(3).5 Yes = 1 No = 0 Needs Improvement = .5	1	NA

SLR Notes:

No imminent safety hazards were discovered.

	Question	Points(MAX)	Score
6	Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(3).6 Yes = 1 No = 0	1	1

SLR Notes:

Yes. PUCO should have a review procedure to ensure probable violations are relayed to PHMSA Central Region within 60 days.

	Question	Points(MAX)	Score
7	Did the state initially submit documentation to support compliance action by PHMSA on probable violations? Previous Question D(3).7 Yes = 1 No = 0 Needs Improvement = .5	1	1

SLR Notes:

Yes.

	Question	Points(MAX)	Score
8	Part C: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only

SLR Notes:

Total points scored for this section: 6

Total possible points for this section: 6

PART D - Incident Investigations

	Question	Points(MAX)	Score
1	Are state personnel following the procedures for Federal/State cooperation in case of an incident? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6.1) Previous Question E.1 Yes = 1 No = 0 Needs Improvement = .5	1	1

SLR Notes:

Yes.

	Question	Points(MAX)	Score
2	Are state personnel familiar with the jurisdictional authority and Memorandum of Understanding between NTSB and PHMSA? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6 ? Appendix D) Previous Question E.2 Yes = .5 No = 0	.5	.5

SLR Notes:

Yes.

	Question	Points(MAX)	Score
3	Did the state keep adequate records of incident notifications received? Previous Question E.3 Yes = 1 No = 0 Needs Improvement = .5	1	1

SLR Notes:

Yes.

	Question	Points(MAX)	Score
4	If an onsite investigation of an incident was not made, did the state obtain sufficient information by other means to determine the facts and support the decision not to go on-site? Previous Question E.4 Yes = 1 No = 0 Needs Improvement = .5	1	1

SLR Notes:

Yes.

	Question	Points(MAX)	Score
5	Were investigations thorough and conclusions and recommendations documented in an acceptable manner? Previous Question E.5, comprehensive question worth 2 points total Yes = 2 No = 0 Needs Improvement = 1	2	2

		Yes	No	Needs Improvement
a.	Observations and Document Review	(•)	( )	( )
b.	Contributing Factors	(•)	( )	( )
c.	Recommendations to prevent recurrences where appropriate	(•)	( )	( )

SLR Notes:

	Question	Points(MAX)	Score
6	Did the state initiate enforcement action for violations found during any incident investigation(s)? Previous Question E.6 Variation Yes = 1 No = 0 Needs Improvement = .5	1	1

SLR Notes:

	Question	Points(MAX)	Score
7	Did the state assist region office by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate annual report data from operators concerning incidents/accidents and investigate discrepancies) (Chapter 6) Previous Question E.7/E.8 Yes = .5 No = 0	.5	0.5

SLR Notes:

Yes.

	Question	Points(MAX)	Score
8	Part D: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only

SLR Notes:

Total points scored for this section: 7
Total possible points for this section: 7

PART E - Damage Prevention Initiatives

		Points(MAX)	Score
1	Has the state reviewed 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? Previous Question B.11 Yes = 2 No = 0 Needs Improvement = 1	2	2

SLR Notes:

Yes

2	Did the state inspector check to assure the pipeline operator is following its written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? New 2008 Yes = 2 No = 0	2	2

SLR Notes:

Yes

3	Did the state encourage and promote the adoption of the Common Ground Alliance Best Practices document to its regulated companies as a means of reducing damages to all underground facilities? Previous Question A.7 Yes = 2 No = 0 Needs Improvement = 1	2	2

SLR Notes:

Yes

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? New 2008 Yes = 1 No = 0	1	1

SLR Notes:

Yes

5	Did the state review operators' records of accidents and failures due to excavation damage to ensure causes of failure are addressed to minimize the possibility of recurrence as required by 192.617? Yes = 2 No = 0	2	2

SLR Notes:

Yes

6	Part E: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only

SLR Notes:

Total points scored for this section: 9

Total possible points for this section: 9

PART F - Field Inspection

		Points(MAX)	Score
1	Operator, Inspector, Location, Date and PHMSA Representative Info Only = No Points Name of Operator Inspected: Vectren Energy Delivery of Ohio Name of State Inspector(s) Observed: Ted Ressler Location of Inspection: Dayton, Ohio Date of Inspection: July 27, 2011 Name of PHMSA Representative: Leonard Steiner	Info Only	Info Only

SLR Notes:

2	Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? New 2008 Yes = 1 No = 0	1	1

SLR Notes:

Yes. The operator received adequate notice.

3	Did the inspector use an acceptable inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) Previous Question F.2 Yes = 2 No = 0	2	2

SLR Notes:

Yes.

4	Did the inspector thoroughly document results of the inspection? Previous Question F.3 Yes = 2 No = 0	2	2

SLR Notes:

Yes.

5	Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps, pyrometer, soap spray, CGI, etc.) New 2008 Yes = 1 No = 0	1	1

SLR Notes:

Yes. Much of the inspection was of the field facilities. The operator had available the equipement needed.

6	What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc) New 2008 Info Only = No Points	Info Only	Info Only

SLR Notes:

Standard Inspection

7	Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) New 2008, comprehensive question worth 2 points total Yes = 2 No = 0 Needs Improvement = 1	2	2

- a. Procedures ☐
- b. Records ☒
- c. Field Activities/Facilities ☒
- d. Other (Please Comment) ☐

SLR Notes:

8	Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Liaison will document reasons if unacceptable) Previous Question F.8 Yes = 2 No = 0	2	2

SLR Notes:

Yes.

9	Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) Previous Question F.10 Yes = 1 No = 0	1	1

SLR Notes:

Yes.

10	During the exit interview, did the inspector identify probable violations found during the inspections? Previous Question F.11 Yes = 1 No = 0	1	1

SLR Notes:

Yes, there were no porbable violatons discovered.

11	What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) Info Only = No Points	Info Only	Info Only

SLR Notes:

On July 27, 2011, I observed Ted Ressler conducting a standard inspection. Mr. Ressler arrived at the correct time and was prepared to conducted the inspection. He inspected records that prepared him to conduct the inspection of field facilities. With a representative of the operator, Mr. Ressler inspected a representative sampling of the facilites. At each stop, he thoroughly inspected and documented the results. Mr. Ressler was knowledgeable and thorough. He conducted the inspection in a courteous and professional manner.

12	Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) Info Only = No Points	Info Only	Info Only

SLR Notes:

No best practices were noted.

13	Field Observation Areas Observed (check all that apply) Info Only = No Points	Info Only	Info Only

a.	Abandonment	☐
b.	Abnormal Operations	☐
c.	Break-Out Tanks	☐
d.	Compressor or Pump Stations	☐
e.	Change in Class Location	☐
f.	Casings	☐
g.	Cathodic Protection	☒
h.	Cast-iron Replacement	☐
i.	Damage Prevention	☐
j.	Deactivation	☐
k.	Emergency Procedures	☐
l.	Inspection of Right-of-Way	☒
m.	Line Markers	☒
n.	Liaison with Public Officials	☐
o.	Leak Surveys	☐
p.	MOP	☐
q.	MAOP	☐
r.	Moving Pipe	☐

s.	New Construction	☐
t.	Navigable Waterway Crossings	☒
u.	Odorization	☐
v.	Overpressure Safety Devices	☒
w.	Plastic Pipe Installation	☐
x.	Public Education	☐
y.	Purging	☐
z.	Prevention of Accidental Ignition	☐
A.	Repairs	☒
B.	Signs	☒
C.	Tapping	☐
D.	Valve Maintenance	☒
E.	Vault Maintenance	☐
F.	Welding	☐
G.	OQ - Operator Qualification	☐
H.	Compliance Follow-up	☐
I.	Atmospheric Corrosion	☒
J.	Other	☐

SLR Notes:

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14 Part F: General Comments/Regional Observations — Info Only Info Only

Info Only = No Points

SLR Notes:

Total points scored for this section: 12

Total possible points for this section: 12

PART G - PHMSA Initiatives - Strategic Plan

		Points(MAX)	Score

Risk base Inspections - Targeting High Risk Areas

		Points(MAX)	Score
1	Does state have process to identify high risk inspection units? Yes = 1.5 No = 0 Risk Factors (criteria) to consider may include: Miles of HCA's, Geographic area, Population Density Length of time since last inspection History of Individual Operator units (leakage, incident and compliance history, etc.) Threats - (Excavation Damage, Corrosion, Natural Forces, Other Outside Forces, Material or Welds, Equipment, Operations, Other)	1.5	1.5

SLR Notes:

Yes.

		Points(MAX)	Score
2	Are inspection units broken down appropriately? (see definitions in Guidelines) Yes = .5 No = 0	.5	0.5

SLR Notes:

Yes.

		Points(MAX)	Score
3	Consideration of operators DIMP Plan? (if available and pending rulemaking) Info Only = No Points	Info Only	Info Only

SLR Notes:

PUCO needs to develop a procedure to conduct DIMP inspections.

		Points(MAX)	Score
4	Does state inspection process target high risk areas? Yes = .5 No = 0	.5	0.5

SLR Notes:

Yes

Use of Data to Help Drive Program Priority and Inspections

		Points(MAX)	Score
5	Does state use data to analyze effectiveness of damage prevention efforts in the state? (DIRT or other data, etc) Yes = .5 No = 0	.5	0.5

SLR Notes:

Yes. they are adding the Annual Report data to damage data for the analysis.

		Points(MAX)	Score
6	Has state reviewed data on Operator Annual reports for accuracy? Yes = .5 No = 0	.5	0.5

SLR Notes:

Yes

		Points(MAX)	Score
7	Has state analyzed annual report data for trends and operator issues? Yes = .5 No = 0	.5	0.5

SLR Notes:

Yes

		Points(MAX)	Score
8	Has state reviewed data on Incident/Accident reports for accuracy? Yes = .5 No = 0	.5	0.5

SLR Notes:

Yes

9	Does state do evaluation of effectiveness of program based on data? (i.e. performance measures, trends, etc.) Yes = .5 No = 0	.5	0.5

SLR Notes:

Yes. They need to improve the documentation for the method of analysis.

10	Did the State input all operator qualification inspection results into web based database provided by PHMSA in a timely manner upon completion of OQ inspections? Previous Question B.15 Yes = .5 No = 0	.5	0.5

SLR Notes:

Yes

11	Did the State submit their replies into the Integrity Management Database (IMDB) in response to the Operators notifications for their integrity management program? Previous Question B.16 Yes = .5 No = 0	.5	NA

SLR Notes:

None were required.

12	Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17 Yes = .5 No = 0	.5	NA

SLR Notes:

No IMP inspections were conducted.

13	Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns? Previous Question B.18 Yes = .5 No = 0	.5	0.5

SLR Notes:

Yes. This is a question on the standard inspection form.

14	Has state confirmed transmission operators have submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submission? Yes = .5 No = 0	.5	0.5

SLR Notes:

Yes. This is a question on a standard inspection form.

Accident/Incident Investigation Learning and Sharing Lessons Learned

15	Has state shared lessons learned from incidents/accidents? (i.e. NAPSR meetings and communications) Yes = .5 No = 0	.5	0.5

SLR Notes:

Yes

16	Does the State support data gathering efforts concerning accidents? (Frequency/Consequence/etc) Yes = .5 No = 0	.5	0.5

SLR Notes:

Yes

17	Does state have incident/accident criteria for conducting root cause analysis? Info Only = No Points	Info Only	Info Only

SLR Notes:

PUCO needs to develop a criteria whe a root cause analysis will be conducted.

18	Does state conduct root cause analysis on incidents/accidents in state? Info Only = No Points	Info Only	Info Only

SLR Notes:

None conducted.

19	Has state participated on root cause analysis training? (can also be on wait list) Yes = .5 No = 0	.5	0.5

SLR Notes:

On inspector is on the waitlist.

Transparency - Communication with Stakeholders

20	Other than pipeline safety seminar does State communicate with stakeholders? (Communicate program data, pub awareness, etc.) Yes = .5 No = 0	.5	0.5

SLR Notes:

PUCO meets regularly with the Ohio Gas Association.

21	Does state share enforcement data with public? (Website, newsletters, docket access, etc.) Yes = .5 No = 0	.5	0.5

SLR Notes:

Any enforcement action other than letters of probable violation is placed on the docket and entered on the Commission website.

22	Part G: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only

SLR Notes:

Total points scored for this section: 9

Total possible points for this section: 9

PART H - Miscellaneous

	Question	Points(MAX)	Score
1	What were the major accomplishments for the year being evaluated? (Describe the accomplishments, NAPSR Activities and Participation, etc.) Yes = .5 No = 0	.5	0.5

SLR Notes:

Accomplishments include further review for regulated gas gathering lines, 3 inspectors left the Commission and all were replaced.

	Question	Points(MAX)	Score
2	What legislative or program initiatives are taking place/planned in the state, past, present, and future? (Describe initiatives (i.e. damage prevention, jurisdiction/authority, compliance/administrative, etc.) Yes = .5 No = 0	.5	0.5

SLR Notes:

The PUCO is working for legislation on the penalty for one-call violations and working on legislation for leak classification.

	Question	Points(MAX)	Score
3	Any Risk Reduction Accomplishments/Projects? (i.e. Cast iron replacement projects,bare steel,third-party damage reductions, etc.) Yes = .5 No = 0	.5	0.5

SLR Notes:

4 largest operators have cast iron and bare steel replacement programs. 5 operators have riser replacement programs.

	Question	Points(MAX)	Score
4	Did the state participate in/respond to surveys or information requests from NAPSR or PHMSA? Yes = 1 No = 0	1	1

SLR Notes:

Yes

	Question	Points(MAX)	Score
5	Sharing Best Practices with Other States - (General Program) Yes = .5 No = 0	.5	0.5

SLR Notes:

Yes.

	Question	Points(MAX)	Score
6	Part H: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only

SLR Notes:

Total points scored for this section: 3
Total possible points for this section: 3

PART I - Program Initiatives

		Points(MAX)	Score

Drug and Alcohol Testing (49 CFR Part 199)

1 Has the state verified that operators have drug and alcohol testing programs? — Points(MAX): 1 — Score: 1

Yes = 1 No = 0

SLR Notes:

Yes

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2 Is the state verifying that operators are conducting the drug and alcohol tests required by the operators program (random, post-incident, etc.) — Points(MAX): .5 — Score: 0.5

Yes = .5 No = 0

SLR Notes:

Yes

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3 Is the state verifying that any positive tests are responded to in accordance with the operator's program? — Points(MAX): .5 — Score: 0.5

Yes = .5 No = 0

SLR Notes:

Yes

Qualification of Pipeline Personnel (49 CFR Part 192 Subpart N)

4 Has the state verified that operators have a written qualification program? — Points(MAX): 1 — Score: 1

Yes = 1 No = 0

SLR Notes:

Yes

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5 Has the state reviewed operator qualification programs for compliance with PHMSA rules and protocols? — Points(MAX): .5 — Score: 0.5

Yes = .5 No = 0

SLR Notes:

Yes

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6 Is the state verifying that persons who perform covered tasks for the operator are qualified in accordance with the operator's program? — Points(MAX): .5 — Score: 0.5

Yes = .5 No = 0

SLR Notes:

Yes

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7 Is the state verifying that persons who perform covered task for the operator are requalified at the intervals specified in the operator's program? — Points(MAX): .5 — Score: 0.5

Yes = .5 No = 0

SLR Notes:

Yes

Gas Transmission Pipeline Integrity Management (49 CFR Part 192 Subpart O)

8 Has the state verified that all operators with transmission pipelines have either adopted an integrity management program (IMP), or have properly determined that one is not required? — Points(MAX): 1 — Score: 1

Yes = 1 No = 0

SLR Notes:

Yes

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9 Has the state verified that in determining whether a plan is required, the operator correctly calculated the potential impact radii and properly applied the definition of a high consequence area? — Points(MAX): .5 — Score: 0.5

Yes = .5 No = 0

SLR Notes:

Yes

10	Has the state reviewed operator IMPs for compliance with Subpart O? (In accordance with State Inspection plan) Yes = .5 No = 0	.5	0.5

SLR Notes:

Yes

11	Is the state monitoring operator progress on the inspections, tests and remedial actions required by the operator's IMP, including that they are being done in the manner and schedule called for in its IMP? Yes = .5 No = 0	.5	NA

SLR Notes:

No IMP inspections were conducted.

12	Is the state verifying that operators are periodically examining their transmission line routes for the appearance of new HCAs? Yes = .5 No = 0	.5	0.5

SLR Notes:

Yes, usually annually.

Public Awareness (49 CFR Section 192.616)

13	Has the state verified that each operator has developed a continuing public awareness program? (due date was 6/20/06 for most operators, 6/20/07 for certain very small operators,6/13/08 for master meters) Yes = .5 No = 0	.5	0.5

SLR Notes:

Yes

14	Has the state reviewed the content of these programs for compliance with 192.616 (by participating in the Clearinghouse or by other means)? Yes = .5 No = 0	.5	0.5

SLR Notes:

Yes

15	Is the state verifying that operators are conducting the public awareness activities called for in its program? Yes = .5 No = 0	.5	0.5

SLR Notes:

Yes

16	Is the state verifying that operators have evaluated their Public Awareness programs for effectiveness as described in RP1162? Info Only = No Points	Info Only	Info Only

SLR Notes:

Yes, but need to use a form similiar to the PHMSA Public Awareness Inspections form.

17	Part I: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only

SLR Notes:

Total points scored for this section: 8.5
Total possible points for this section: 8.5