



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

1200 New Jersey Avenue SE  
Washington DC 20590

## 2014 Hazardous Liquid State Program Evaluation

for

INDIANA UTILITY REGULATORY COMMISSION

### Document Legend

#### PART:

- O -- Representative Date and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- Program Performance
- D -- Compliance Activities
- E -- Accident Investigations
- F -- Damage Prevention
- G -- Field Inspections
- H -- Interstate Agent State (if applicable)
- I -- 60106 Agreement State (if applicable)



2014 Hazardous Liquid State Program Evaluation -- CY 2014  
Hazardous Liquid

**State Agency:** Indiana  
**Agency Status:**  
**Date of Visit:** 07/06/2015 - 07/17/2015  
**Agency Representative:** Steve Allen, Director, & Bill Boyd, Division Manager  
**PHMSA Representative:** Patrick Gaume  
**Commission Chairman to whom follow up letter is to be sent:**  
**Name/Title:** Carol A. Stephan, Chair  
**Agency:** Indiana Utility Regulatory Commission  
**Address:** 101 West Washington Street, Suite 1500 East  
**City/State/Zip:** Indianapolis, Indiana 46204-3407

**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 2014 (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 than 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 progress report attachments provide the basis for determining the state's pipeline safety grant allocation.

**Field Inspection (PART G):**

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 G, the PHMSA representative should include a written summary which thoroughly documents the inspection.

**Scoring Summary**

<b>PARTS</b>	<b>Possible Points</b>	<b>Points Scored</b>
A Progress Report and Program Documentation Review	10	10
B Program Inspection Procedures	13	13
C Program Performance	42	42
D Compliance Activities	15	15
E Accident Investigations	11	11
F Damage Prevention	8	8
G Field Inspections	12	12
H Interstate Agent State (if applicable)	0	0
I 60106 Agreement State (if applicable)	0	0
<b>TOTALS</b>	<b>111</b>	<b>111</b>
<b>State Rating</b> .....		<b>100.0</b>



# PART A - Progress Report and Program Documentation Review

Points(MAX) Score

<b>1</b>	Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1 Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

A1. Yes. Okay enough. Attachment 1 needs to be corrected due to confusion with previous directions. Attachment 1 will be submitted for correction by 7/17/15. Attachment 1 as amended will be in agreement with Attachments 3 & 8.

<b>2</b>	Review of Inspection Days for accuracy - Progress Report Attachment 2 Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

A2. Yes. Attachment 2 is consistent with internal records (a database that is exported to a spreadsheet).

<b>3</b>	Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3 Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

A3. Yes. Attachment 3 is consistent with internal records.

<b>4</b>	Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4 Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

A4. Yes. Attachment 4 is correct.

<b>5</b>	Accuracy verification of Compliance Activities - Progress Report Attachment 5 Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

A5. Yes. Attachment 5 is consistent with internal records.

<b>6</b>	Were pipeline program files well-organized and accessible? - Progress Report Attachment 6 Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

A6. Yes. Most of the records in Attachment 6 are now electronic, but several of these records also have paper files.

<b>7</b>	Was employee listing and completed training accurate and complete? - Progress Report Attachment 7 Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

A7. Yes. Attachment 7 appears to be consistent with internal records

<b>8</b>	Verification of Part 195,198,199 Rules and Amendments - Progress Report Attachment 8 Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

A8. Yes. Attachment 8 is consistent with IN LAW.

<b>9</b>	List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10 Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

A9. Yes. Attachment 10 is a well-developed report.

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**10** General Comments:

Info Only|Info Only

Info Only = No Points

Evaluator Notes:

A10. Yes, the HL program is off to a good start. It is a very small program that enjoys the benefit of being associated with a mature & professional NG program.

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



# PART B - Program Inspection Procedures

Points(MAX) Score

- 
- |   |  |   |   |
|---|--|---|---|
| 1 | Standard Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 2 | 2 |
|---|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

B1. Yes. Inspection procedures including risk model, selection, assignment, pre-inspection, inspection, post inspection, write up, violation handling & closing for all types of inspections are described in Sections V & VI of the program manual.

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- |   |   |   |   |
|---|---|---|---|
| 2 | IMP Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|---|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

B2. Yes. Inspection procedures including risk model, selection, assignment, pre-inspection, inspection, post inspection, write up, violation handling & closing for all types of inspections are described in Sections V & VI of the program manual.

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- |   |  |   |   |
|---|--|---|---|
| 3 | OQ Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

B3. Yes. Inspection procedures including risk model, selection, assignment, pre-inspection, inspection, post inspection, write up, violation handling & closing for all types of inspections are described in Sections V & VI of the program manual.

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- |   |   |   |   |
|---|---|---|---|
| 4 | Damage Prevention Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|---|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

B4. Yes. Inspection procedures including risk model, selection, assignment, pre-inspection, inspection, post inspection, write up, violation handling & closing for all types of inspections are described in Sections V & VI of the program manual. In addition, IURC has developed a Damage Prevention Inspection Form which is used as an addendum to the standard inspection form and expands the Damage Prevention review.

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- |   |  |   |   |
|---|--|---|---|
| 5 | Any operator training conducted should be outlined and appropriately documented as needed. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

B5. Yes. Operator Training is addressed in Section V of the program manual under its own sub-heading.

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- |   |  |   |   |
|---|--|---|---|
| 6 | Construction Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

B6. Yes. Inspection procedures including risk model, selection, assignment, pre-inspection, inspection, post inspection, write up, violation handling & closing for all types of inspections are described in Sections V & VI of the program manual. Construction Inspection is addressed in Section V of the program manual under its own sub-heading.

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- |    |   |                                      |  |
|----|---|--------------------------------------|--|
| 7  | Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements?<br>Yes = 6 No = 0 Needs Improvement = 1-5                               | 6                                    | 6  |
| a. | Length of time since last inspection (Within five year interval)  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. | Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| c. | Type of activity being undertaken by operators (i.e. construction)  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| d. | Locations of operators inspection units being inspected - (HCA's, Geographic area, Population Density, etc)   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| 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) | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| f. | Are inspection units broken down appropriately?   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

B7. Yes. See Section IV of the program manual, "Data-Driven Risk Model and ?" sub-heading.

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

Info Only Info Only

Evaluator Notes:

B8. Yes. The IURC made significant progress in developing its overall program guidance and documentation during the year. The continued development and refinement of the Data-Driven Risk Model which drives the annual Inspection Plan, was significant.

Total points scored for this section: 13  
Total possible points for this section: 13



# PART C - Program Performance

Points(MAX) Score

- 1** Was ratio of Total Inspection person-days to total person days acceptable? (Director of State Programs may modify with just cause) Chapter 4.3  
 Yes = 5 No = 0
- A. Total Inspection Person Days (Attachment 2):  
 11.00
- B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
 220 X 0.05 = 11.00
- Ratio: A / B  
 11.00 / 11.00 = 1.00
- If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0  
 Points = 5

Evaluator Notes:

C1. Yes. 11AFOD, 0.05 inspector-years, 11/(.05\*220)=1.00, >.38 okay.

- 2** Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines Appendix C for requirements) Chapter 4.4  
 Yes = 5 No = 0 Needs Improvement = 1-4
- a. Completion of Required OQ Training before conducting inspection as lead? Yes  No  Needs Improvement
- b. Completion of Required IMP Training before conducting inspection as lead? Yes  No  Needs Improvement
- c. Root Cause Training by at least one inspector/prgram manager? Yes  No  Needs Improvement
- d. Note any outside training completed? Yes  No  Needs Improvement
- e. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector. Yes  No  Needs Improvement

Evaluator Notes:

C2. Yes. All inspectors with 3+ years have completed their training. New inspectors are in the training cycle. All Inspectors attend one of the Purdue NACE corrosion courses annually.

- 3** Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1  
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

C3. Yes. Steve & Bill make a great tag team! They are running a fine program. They show great knowledge.

- 4** 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 = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

C4. Yes. The Chairman letter was 11/20/14, the Chairman response was 1/16/15. The response addressed both issues.

- 5** Did State hold PHMSA TQ Seminar in Past 3 Years? Chapter 8.5  
 Yes = 2 No = 0

Evaluator Notes:

C5. Yes, in May of 2013 & May of 2015. Practice is for every other year.

- 6** 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

Evaluator Notes:

C6. Yes. Reviewed for Standard, GIMP, LIMP, DIMP, PAPEI, CRM, & OQ; All okay.



7	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 Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

C7. Yes. IURC uses the Federal Forms and addendum questions for its State Forms. I noted that some inspections are spread out over multiple years. I advised IURC that it is likely that portions of the inspection will be missed and fall out of the 5 yr inspection period if that practice continues. It was also noted that some special inspections need better explanations for the purpose and scope of the inspection. It was also noted that the inspection files are disjointed; that consolidation of the files is strongly advised. I further advised that NA, NC, & U are best explained in the inspection form itself, and not to rely on the Violation Letter or other notes to file.

8	Did the state review operator procedures for determining areas of active corrosion on liquid lines in sufficient detail? (NOTE: PHMSA representative to describe state criteria for determining areas of active corrosion) Yes = 1 No = 0	1	1
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Evaluator Notes:

C8. Yes, during Std Insp; All pipelines need to comply with the Part 195 corrosion standards

9	Did the state adequately review for compliance operator procedures for abandoning pipeline facilities and analyzing pipeline accidents to determine their causes? (NOTE: PHMSA representative to describe state criteria for determining compliance with abandoning pipeline facilities and analyzing pipeline accidents to determine their causes) Yes = 1 No = 0	1	1
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Evaluator Notes:

C9. Yes. it is in the Haz Liq Std Inspection Form. 195.402(c)(10), 195.402(c)(5).

10	Is the state aware of environmentally sensitive areas traversed by or adjacent to hazardous liquid pipelines? (reference Part 195, review of NPMS) Yes = 1 No = 0	1	1
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Evaluator Notes:

C10. Yes Safety Division uses NPMS to monitor & compare with operator maps. 195.402(c)(1) of inspection form.

11	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 195.402(c)(5)? Yes = 1 No = 0	1	1
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Evaluator Notes:

C11. YES. it is question 11 on the Std Insp Form, per 195.402(c)(5), and all accidents are followed up with most having on-site investigation.

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

C12. Yes. The annual reports are scored against a checklist, and data from the annual reports is used in the Risk Model.

13	Did state input all applicable OQ, IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1 Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

C13. Yes, the OQ, GIMP, DIMP, & LIMP databases were reviewed and are properly populated.



14 Has state confirmed intrastate operators have submitted information into NPMS database along with changes made after original submission? 1 1  
 Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

C14. Yes. Annual report mileage is compared to NPMS mileage for all transmission operators as an annual exercise.

15 Is the state verifying operators are conducting drug and alcohol tests as required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199 2 2  
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

C15. Yes. All operators receive the long form and/or short form D&A inspection within the inspection interval.

16 Is state verifying operators OQ programs are up to date? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals determined in the operators plan. 49 CFR 195 Part G 2 2  
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

C16. Yes. Full OQ re-inspections are current; OQ Field inspections are part of most Standard Inspections.

17 Is state verifying operator's hazardous liquid integrity management (L IMP) Programs are up to date? This should include a previous review of LIMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 195.452 Appendix C 2 2  
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

C17. Yes. The GIMP, LIMP, & DIMP re-inspections are current, HCA and new constructions are investigated relative to IMP during most standard inspections.

18 Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. 49 CFR 195.440 PAPEI Effectiveness Inspections should have been completed by December 2013 2 2  
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

C18. Yes. The PAPEI inspections were finished in 2013, and Public Awareness is touched on during all Standard Inspections.

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

Evaluator Notes:

C19. Yes, bi-annual TQ Safety Seminars, email announcements as appropriate, ad hoc & inspection training, MM training seminars, and has a website for information for all stakeholders.

20 Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 1 NA  
 Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

C20. NA. no SRC in 2014.

21 Did the state participate in/respond to surveys or information requests from NAPSRS or PHMSA? 1 1



Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

C21. Yes. Steve is presently serving on the NAPS Board, and IURC responds to all NAPS requests.

<b>22</b>	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.(New Question for CY2013, no points until CY2015 evaluation conducted in CY2016.)	0	0
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Info Only = No Points

Evaluator Notes:

C22. There were no waivers issued for the HL program.

<b>23</b>	Did the state attend the National NAPS Board of Directors Meeting in CY being evaluated? (New Question for CY2014, no points first year)	0	0
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Info Only = No Points

Evaluator Notes:

C23. Yes. Steve & Bill attended Nat'l NAPS, and Steve got elected to the Board.

<b>24</b>	Discussion on State Program Performance Metrics found on Stakeholder Communication site ? (question will be rolled up and included as part of Question C-12 on future evaluations) <a href="http://primis.phmsa.dot.gov/comm/states.htm">http://primis.phmsa.dot.gov/comm/states.htm</a>	0	0
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Info Only = No Points

Evaluator Notes:

C24. Yes. The IN state metrics were reviewed, the metrics show promise of being useful. However, whether these metrics are ALL of the appropriate measures for pipeline safety is yet to be determined.

<b>25</b>	General Comments:	Info Only	Info Only
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Info Only = No Points

Evaluator Notes:

C25. Yes. The IURC has in place a very sophisticated risk model along with the associated tools for tracking and scheduling inspections. The overall number of inspection days completed by the IURC was satisfactory based on the number of dedicated pipeline safety inspection staff and the number of operators, miles of main and number of services within the state. The IURC should develop a better system for recording, tracking, organizing and consolidating individual inspection documents. This should be addressed with the new Pipeline Safety Information System.

Total points scored for this section: 42  
Total possible points for this section: 42



# PART D - Compliance Activities

Points(MAX) Score

- |    |  |                                      |  |
|----|--|--------------------------------------|--|
| 1  | Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1<br>Yes = 4 No = 0 Needs Improvement = 1-3 | 4                                    | 4  |
| a. | Procedures to notify an operator (company officer) when a noncompliance is identified  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. | Procedures to routinely review progress of compliance actions to prevent delays or breakdowns  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

D1. Yes. See Section VI in the Program Manual.

- |    |  |                                      |  |
|----|--|--------------------------------------|--|
| 2  | 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<br>Yes = 4 No = 0 Needs Improvement = 1-3 | 4                                    | 4  |
| a. | Were compliance actions sent to company officer or manager/board director if municipal/government system?  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. | Were probable violations documented?   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| c. | Were probable violations resolved?   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| d. | Was the progress of probable violations routinely reviewed?  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

D2. Yes. The process as described in Section VI is used every time.

- |   |  |   |   |
|---|--|---|---|
| 3 | Did the state issue compliance actions for all probable violations discovered?<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

D3. Yes. The violations found were identified in the violation letters.

- |   |   |   |   |
|---|---|---|---|
| 4 | Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary.<br>Yes = 2 No = 0 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

D4. Yes. Due process is given to all.

- |   |   |   |   |
|---|---|---|---|
| 5 | 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)<br>Yes = 2 No = 0 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

D5. Yes. IURC has developed a matrix for fine assessment.

- |   |   |   |   |
|---|---|---|---|
| 6 | Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations?<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

D6. Yes. Assessed \$180,000 fine in CY2013 in its NG program.

- |   |  |           |           |
|---|--|-----------|-----------|
| 7 | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

D7. Yes. The IURC has shown it uses several of the enforcement methods available to it to ensure operators comply with



pipeline safety regulations. In addition to the use of Warning Letters, Notices of Probable Violations and the issuance of civil fines, etc., the IURC also will work collaboratively with operators to gain compliance.

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



# PART E - Accident Investigations

Points(MAX) Score

- 1 Does the state have written procedures to address state actions in the event of an incident/accident? 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

E1. Yes. See Section IX of the Program Manual.

- 2 Does state have adequate mechanism to receive and respond to operator reports of accidents, including after-hours reports? And did state keep adequate records of Incident/Accident notifications received? Chapter 6 2 2  
Yes = 2 No = 0 Needs Improvement = 1

- a. Acknowledgement of MOU between NTSB and PHMSA (Appendix D) Yes  No  Needs Improvement   
b. Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E) Yes  No  Needs Improvement

Evaluator Notes:

E2. Yes. The 24 hr no. is 317-232-2707. IURC is very aware of appendix D & E.

- 3 If onsite investigation was not made, did state obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

E3. Yes. Most significant incidents/accidents are investigated on-site. The others are reviewed telephonically, with emails, with 30 day reports, and with other timely written reports.

- 4 Were all accidents investigated, thoroughly documented, and with conclusions and recommendations? 3 3  
Yes = 3 No = 0 Needs Improvement = 1-2

- a. Observations and document review Yes  No  Needs Improvement   
b. Contributing Factors Yes  No  Needs Improvement   
c. Recommendations to prevent recurrences where appropriate Yes  No  Needs Improvement

Evaluator Notes:

E4. Yes, Attachment 4 of the Base Grant Progress Report is adequate, and the Incident/Accident files are complete. It was also noted that the Incident/Accident files are disjointed; that consolidation of the files is strongly advised.

- 5 Did the state initiate compliance action for violations found during any incident/accident investigation? 1 1  
Yes = 1 No = 0

Evaluator Notes:

E5. NA. No probable violations were discovered during an incident/accident in CY 2014.

- 6 Did the state assist region office by taking appropriate follow-up actions related to the operator accident reports to ensure accuracy and final report has been received by PHMSA? (validate report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

E6. Yes, Appendix E in the Guidelines is understood and IURC will assist whenever requested.

- 7 Does state share lessons learned from incidents/accidents? (sharing information, such as: at NAPS Region meetings, state seminars, etc) 1 1  
Yes = 1 No = 0

Evaluator Notes:

E7. Yes, during the Central Region NAPSIR meetings.

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**8** General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

E8. Yes. IURC is happy to report that there were no HL significant accidents in 2014. Procedures and training are in place to respond to accidents as they occur.

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Total points scored for this section: 11  
Total possible points for this section: 11



## PART F - Damage Prevention

Points(MAX) Score

- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | 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?<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

F1. Yes, It is a question on the Std Insp Form

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- |          |   |   |   |
|----------|---|---|---|
| <b>2</b> | 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?<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

F2. Yes, the question are on the IN State -Damage Prevention Form which is used as an addendum to the Std Insp Form.

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- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | Did the state encourage and promote practices for reducing damages to all underground facilities to its regulated companies? (i.e. such as promoting/adopting the CGA Best Practices encouraging adoption of the 9 Elements, etc.)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

F3. Yes, the IURC is actively engaged with the various Damage Prevention Councils that exist throughout the state. They are also actively engaged with the state's Underground Plant Protection Advisory Committee and are aggressively enforcing the state's One-Call Law.

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- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | 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? (This can include DIRT and other data shared and reviewed by the pipeline safety program)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

F4. Yes, hits per thousand is rolled into the risk management model.

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- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>5</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

F5. In Indiana, fines collected for One-Call violations are dedicated to damage prevention efforts. This is accomplished by developing programs related to Public Awareness, Training and Incentives designed to reduce excavation damages. This is clearly an area of high interest in Indiana. The IURC has also developed a Damage Prevention specific Inspection Form and is doing a good job holding all operators accountable for damage prevention through inspections and enforcement of the state's One-Call law.

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Total points scored for this section: 8  
Total possible points for this section: 8



# PART G - Field Inspections

Points(MAX) Score

**1** Operator, Inspector, Location, Date and PHMSA Representative Info Only Info Only  
 Info Only = No Points

Name of Operator Inspected:  
 Country Mark, opid 26049  
 Name of State Inspector(s) Observed:  
 Rich Medcalf, inspector  
 Location of Inspection:  
 906 Givens Rd, Mt. Vernon, IN 47620  
 Date of Inspection:  
 7/8/15  
 Name of PHMSA Representative:  
 Patrick Gaume

Evaluator Notes:

G1. Country Mark, opid 26049 Rich Medcalf, inspector 906 Givens Rd, Mt. Vernon, IN 47620, 7/8/15, Patrick Gaume

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

Evaluator Notes:

G2. Yes. It was scheduled, four operator personnel were present, & it was at their location.

**3** 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:

G3. Yes, the federal form was used.

**4** Did the inspector thoroughly document results of the inspection? 2 2  
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

G4. Yes, every item was documented.

**5** Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps, valve keys, half cells, etc) 1 1  
 Yes = 1 No = 0

Evaluator Notes:

G5. Yes, OQ manual, computer, internet connection, electronic files, paper files.

**6** Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) 2 2  
 Yes = 2 No = 0 Needs Improvement = 1

- a. Procedures
- b. Records
- c. Field Activities
- d. Other (please comment)

Evaluator Notes:

G6. Yes, procedures & records, This OQ inspection was focused on procedures and records.

**7** 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:

G7. Yes, Rich Medcalf demonstrated knowledge and thoroughness while conducting the inspection.

8 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) 1 1  
Yes = 1 No = 0

Evaluator Notes:

G8. Yes, There are several gaps, need training for document collecting and handling, need to establish formal job performance training, must supplement the Veriforce information, amend procedures to identify how OQ procedures are communicated to contractors, need clearer detail for collecting and filing contractor records.

9 During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable) 1 1  
Yes = 1 No = 0

Evaluator Notes:

G9. Yes, There are several gaps, need training for document collecting and handling, need to establish formal job performance training, must supplement the Veriforce information, amend procedures to identify how OQ procedures are communicated to contractors, need clearer detail for collecting and filing contractor records.

10 General Comments: 1) What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) 2) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) 3) Other Info Only Info Only  
Info Only = No Points

- 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

Evaluator Notes:

G10. G. OQ-Operator Qualification; Yes, this was an OQ inspection.

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Total points scored for this section: 12  
Total possible points for this section: 12



**PART H - Interstate Agent State (if applicable)**

**Points(MAX) Score**

**1** Did the state use the current federal inspection form(s)? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:  
H1-8. NA. Not an Interstate Agent Program.

**2** Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:  
H1-8. NA. Not an Interstate Agent Program.

**3** Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:  
H1-8. NA. Not an Interstate Agent Program.

**4** Were 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.) 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:  
H1-8. NA. Not an Interstate Agent Program.

**5** Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:  
H1-8. NA. Not an Interstate Agent Program.

**6** Did the state give written notice to PHMSA within 60 days of all probable violations found? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:  
H1-8. NA. Not an Interstate Agent Program.

**7** Did the state initially submit documentation to support compliance action by PHMSA on probable violations? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:  
H1-8. NA. Not an Interstate Agent Program.

**8** General Comments: Info OnlyInfo Only  
Info Only = No Points

Evaluator Notes:  
H1-8. NA. Not an Interstate Agent Program.

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



**PART I - 60106 Agreement State (if applicable)**

**Points(MAX) Score**

**1** Did the state use the current federal inspection form(s)? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:  
I1-7. NA. Not a 60106 Program.

**2** Are results documented demonstrating inspection units were reviewed in accordance with state inspection plan? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:  
I1-7. NA. Not a 60106 Program.

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

Evaluator Notes:  
I1-7. NA. Not a 60106 Program.

**4** Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:  
I1-7. NA. Not a 60106 Program.

**5** Did the state give written notice to PHMSA within 60 days of all probable violations found? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:  
I1-7. NA. Not a 60106 Program.

**6** Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:  
I1-7. NA. Not a 60106 Program.

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

Evaluator Notes:  
I1-7. NA. Not a 60106 Program.

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

