



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

1200 New Jersey Avenue SE
Washington DC 20590

2015 Gas State Program Evaluation

for

PUBLIC UTILITIES COMMISSION OF OHIO

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 -- Incident Investigations
- F -- Damage Prevention
- G -- Field Inspections
- H -- Interstate Agent State (If Applicable)
- I -- 60106 Agreement State (If Applicable)



2015 Gas State Program Evaluation -- CY 2015

Gas

State Agency: Ohio

Agency Status:

Date of Visit: 06/20/2016 - 06/24/2016

Agency Representative: Peter Chace
Chief, Gas Pipeline Section

PHMSA Representative: Clint Stephens
State Evaluator

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

Name/Title: Mr. Hazim Z. Haque, Chairman

Agency: The Public Utilities of Ohio

Address: 180 East Broad Street

City/State/Zip: Columbus, Ohio 43215

Rating:

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

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 2015 (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

PARTS		Possible Points	Points Scored
A	Progress Report and Program Documentation Review	10	9.5
B	Program Inspection Procedures	13	13
C	Program Performance	49	48
D	Compliance Activities	15	15
E	Incident Investigations	11	11
F	Damage Prevention	8	8
G	Field Inspections	11	11
H	Interstate Agent State (If Applicable)	4	4
I	60106 Agreement State (If Applicable)	0	0
TOTALS		121	119.5
State Rating		98.8

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- | | | | |
|----------|---|---|---|
| 1 | Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:
Ohio Code 4905.90 through .96 was revised for jurisdictional authority effective July 30, 2014. State program possibly adopting new Code requirements in 2016.

- | | | | |
|----------|--|---|---|
| 2 | Review of Inspection Days for accuracy - Progress Report Attachment 2
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:
Inspectors turn in project sheets on a bi-weekly basis to track their time. At the end of calendar year the number of inspection days for each inspector is loaded in their Gas Pipeline Database.

- | | | | |
|----------|--|---|-----|
| 3 | Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 0.5 |
|----------|--|---|-----|

Evaluator Notes:
Ohio failed to list "Ohio Rural Natural Gas" to its list of Inspection units.
Ohio needs to add "Ohio Rural Natural Gas" to its list of operators in Attachment 3 of the 2015 Progress Report.

- | | | | |
|----------|--|---|---|
| 4 | Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:
There were three gas distribution and five transmission reportable incidents in 2015. This information was verified through the Pipeline Data Mart.

- | | | | |
|----------|--|---|---|
| 5 | Accuracy verification of Compliance Activities - Progress Report Attachment 5
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:
All enforcement data entered and tracked through the Gas Pipeline Section (GPS) Database.

- | | | | |
|----------|---|---|---|
| 6 | Were pipeline program files well-organized and accessible? - Progress Report Attachment 6
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:
Inspection records are kept in PDF format in the GPS T2000 drive which links to the Gas Pipeline Section (GPS) database.

- | | | | |
|----------|--|---|---|
| 7 | Was employee listing and completed training accurate and complete? - Progress Report Attachment 7
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:
Completed training was accurate and complete.

- | | | | |
|----------|---|---|---|
| 8 | Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:
Taking steps to adopt amendments that have effective dates of 3/6/2015. State have two years to adopt rules and amendments.



9 List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Ohio administrative code requires operator to notify PUCO before construction project begins. Will try to inspect more construction projects in 2016. Damage prevention enforcement went into effect in January 1, 2016. Four jurisdictional operators have cast iron pipe with a total of 317 miles as of 2015.

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

Evaluator Notes:

Ohio had one issue of concern in Part A of Program Evaluation. State Program failed to list all operators that were jurisdictional during the 2015 evaluation period.

Total points scored for this section: 9.5
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.
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Recommend adding to Gas Pipeline Safety Inspection Plan of Ohio, " NTSB recommendations that apply to the system/ segments being inspected..." from Appendix S to pre-inspection activities.(See Inspection Plan, page 10)

- | | | | |
|---|---|---|---|
| 2 | IMP and DIMP 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.
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

Procedures outlined in page 6 of Gas Pipeline Safety Inspection Plan.

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

Evaluator Notes:

Procedures outlined in page 5 of Gas Pipeline Safety Inspection Plan.

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

Evaluator Notes:

Procedures outlined in page 3 of Gas Pipeline Safety Inspection Plan.

- | | | | |
|---|---|---|---|
| 5 | Any operator training conducted should be outlined and appropriately documented as needed.
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

Procedures outlined in page 9 of Gas Pipeline Safety Inspection Plan.

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

Evaluator Notes:

Procedure outlined in page 8 of Gas Pipeline Inspection Plan. Recommend adding reference to "Plastic Piping Construction Checklist" to the "Natural Gas Pipeline Construction/Replacement Bi-Weekly Inspection Report".

- | | | | |
|---|---|---|---|
| 7 | Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements?
Yes = 6 No = 0 Needs Improvement = 1-5 | 6 | 6 |
|---|---|---|---|

- a. Length of time since last inspection (Within five year interval) Yes No Needs Improvement
- b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) Yes No Needs Improvement
- c. Type of activity being undertaken by operators (i.e. construction) Yes No Needs Improvement
- d. Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc) Yes No Needs Improvement
- 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 No Needs Improvement
- f. Are inspection units broken down appropriately? Yes No Needs Improvement

Evaluator Notes:

Inspection priorities have been outlined in Attachment 2 ? "Risk Based Inspection Prioritization" of the Gas Pipeline Inspection Plan. Recommend IM field verification intervals be revised from 7 years to 5 years in the Inspection Plan, section "Time Intervals for Inspections.

8 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were two recommendations made pertaining to the Gas Pipeline Safety Inspection Plan. Revise checklist for construction inspections and inspection intervals for IM inspections.

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 5 5
 Yes = 5 No = 0
 A. Total Inspection Person Days (Attachment 2):
 1710.10
 B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
 220 X 10.00 = 2200.00
 Ratio: A / B
 1710.10 / 2200.00 = 0.78
 If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0
 Points = 5

Evaluator Notes:

Total inspection Person Days is not correct based on 10 hour days for 4 days considered 5 inspection days, and Number of inspection person years incorrect. Should be 10 based on Attachment 7 of 2015 Progress Report. However; Ohio did meet ratio of total inspection person-days.

- 2** Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines Appendix C for requirements) Chapter 4.4 5 5
 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 DIMP*/IMP Training before conducting inspection as lead? *Effective Evaluation CY2013 Yes No Needs Improvement
 - c. Root Cause Training by at least one inspector/program 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:

All inspectors completing OQ inspections have completed the TQ OQ web based training. All DIMP and IMP leads have completed the TQ course track. Oameh and Purcell have completed Root Cause Training.

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

Evaluator Notes:

Yes, program manager showed adequate knowledge of PHMSA program and regulations.

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

Evaluator Notes:

Yes, Chairman's Letter was sent on 9/24/15 and the response received on 9/28/15.

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

Evaluator Notes:

Yes, last seminar was held 9/10-11/2014.

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

Evaluator Notes:

Central State and Wilberforce University have not been inspected since 2013. Exceeded the 2 year interval for master meter system inspections as required by the Gas Pipeline Safety Inspection Plan.

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
----------	--	---	---

Evaluator Notes:

Reviewed standard inspection and headquarters (procedures). Ohio has more stringent requirements for classifying of leaks (1, 2, or 3). There are no requirements that documentation be recorded for U, NA, and NC in the inspection forms.

8	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) Chapter 5.1 Yes = 1 No = 0	1	1
----------	---	---	---

Evaluator Notes:

Yes, question included in the O&M inspection form, page 9 (under 192.459).

9	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) Chapter 5.1 Yes = 1 No = 0	1	1
----------	--	---	---

Evaluator Notes:

Yes, question included in the O&M inspection form, page 13 (under 192.613).

10	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) Chapter 5.1 Yes = 1 No = 0	1	1
-----------	---	---	---

Evaluator Notes:

Yes, question included in the Damage Prevention form, page 4.

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 192.617? Chapter 5.1 Yes = 1 No = 0	1	1
-----------	--	---	---

Evaluator Notes:

Yes, question included in the O&M inspection form, page 13 (under 192.617).
Procedure also included in Damage Prevention form, page 4.

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
-----------	--	---	---

Evaluator Notes:

Ohio looks at trending of bare and cast iron pipe, excavation damage per 1000 tickets, damage per mile of main; and Incidents and outages.

13	Did state input all applicable OQ, DIMP/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
-----------	--	---	---

Evaluator Notes:



Yes, 4 completed 2015 IM Inspections uploaded in the IMDB. Also, 16 OQ Program Inspections and 117 OQ field inspections uploaded in the OQDB for 2015.

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

Evaluator Notes:

Yes, question is included in the O&M inspection form, page 2 (under 191.29).

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

Evaluator Notes:

Yes, question is included in the O&M inspection form, page 24.

- | | | | |
|-----------|---|---|---|
| 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 192 Part N
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

Yes, Ohio uses PHMSA form 14 for all HQ inspections, PHMSA form 15 for all Records inspections

- | | | | |
|-----------|--|---|---|
| 17 | Is state verifying operator's gas transmission integrity management programs (IMP) are up to date? This should include a previous review of IMP 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 192 Subpart 0
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|

Evaluator Notes:

Ohio program goal is to review progress every other year. They utilize PHMSA Form 16 to document inspection results.

- | | | | |
|-----------|---|---|---|
| 18 | Is state verifying operator's gas distribution integrity management Programs (DIMP)? This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart P DIMP ? First round of program inspections should have been complete by December 2014
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

Ohio uses PHMSA Form 24 to review DIMP, along with monitoring progress. This is performed as part of the O&M inspection.

- | | | | |
|-----------|---|---|---|
| 19 | 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 192.616 (I13-16) PAPEI Effectiveness Inspections should be conducted every four years per RP1162
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

Yes, question is included in the O&M inspection form, page 15.



20 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:
 Every year Ohio attends Ohio Gas Association seminar; public information on the commission's website; and responses to public complaints.

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

Evaluator Notes:
 All SRCRs have been closed as of the 2015 CY.

22 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? 1 1
 Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
 Yes, question is included in the O&M Inspection form, page 13 (under 192.617).

23 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:
 Yes , provided information to PHMSA on underground storage.

24 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. 1 NA
 No = 0 Needs Improvement = .5 Yes = 1

Evaluator Notes:
 State has issued no waivers.

25 Did the state attend the National NAPSRS Board of Directors Meeting in CY being evaluated? 1 1
 No = 0 Needs Improvement = .5 Yes = 1

Evaluator Notes:
 Yes, attended the AZ National Meeting in 2015.

26 Discussion on State Program Performance Metrics found on Stakeholder Communication site - <http://primis.phmsa.dot.gov/comm/states.htm> 2 2
 No = 0 Needs Improvement = 1 Yes = 2

- a. Discussion of Potential Accelerated Actions (AA's) based on any negative trends Yes No Needs Improvement
- b. NTSB P-11-20 Meaningful Metrics Yes No Needs Improvement

Evaluator Notes:
 Based on the evaluation of the Ohio State Program Performance Metrics there were no negative trends identified. Excavation Damages per 1000 tickets metrics chart indicates a slight uptick in excavation damage from 2013 to 2014; however damages decreased in 2015 below calendar year 2013 numbers per 1000 tickets. Also, Gas Distribution System Leaks metrics chart indicates a slight increase in leaks repaired per 1000 miles of pipe from 2014 to 2015 which coincided with a slight decrease in leaks outstanding per 1000 miles within the same time period.

27 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

There was one recommended item to Ohio that in their inspection forms include a requirement for inspectors to include comments on form when selecting U, N/C, or N/A.

There was one item of concern pertaining to Ohio failing to inspect two master meter operators within the necessary inspection intervals as required by their Gas Pipeline Inspection Plan.

Total points scored for this section: 48
Total possible points for this section: 49



PART D - Compliance Activities

Points(MAX) Score

- | | | |
|---|--|--|
| <p>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
Yes = 4 No = 0 Needs Improvement = 1-3</p> <p>a. Procedures to notify an operator (company officer) when a noncompliance is identified</p> <p>b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns</p> | <p>4</p> <p>Yes <input checked="" type="radio"/> No <input type="radio"/></p> <p>Yes <input checked="" type="radio"/> No <input type="radio"/></p> | <p>4</p> <p>Needs Improvement <input type="radio"/></p> <p>Needs Improvement <input type="radio"/></p> |
|---|--|--|

Evaluator Notes:

Yes, included the Gas Pipeline Inspection Plan, pages 11-13.

- | | | |
|---|---|---|
| <p>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
Yes = 4 No = 0 Needs Improvement = 1-3</p> <p>a. Were compliance actions sent to company officer or manager/board member if municipal/government system?</p> <p>b. Document probable violations</p> <p>c. Resolve probable violations</p> <p>d. Routinely review progress of probable violations</p> <p>e. Were applicable civil penalties outlined in correspondence with operator(s)</p> | <p>4</p> <p>Yes <input checked="" type="radio"/> No <input type="radio"/></p> | <p>4</p> <p>Needs Improvement <input type="radio"/></p> |
|---|---|---|

Evaluator Notes:

Reviewed enforcement records on the T2000 drive. There were no issues identified.

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

Evaluator Notes:

Some were addressed through informal enforcement; and some were addressed through compliance actions.

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

Evaluator Notes:

Compliance action due process is outlined in Ohio R.C. 4905.93-.96, and Ohio Administrative Code, Chapter 4901:1-16.

- | | | |
|--|----------|----------|
| <p>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)
Yes = 2 No = 0 Needs Improvement = 1</p> | <p>2</p> | <p>2</p> |
|--|----------|----------|

Evaluator Notes:

Yes, the program manager is familiar with state process for imposing civil penalties. In 2015, there were civil penalties imposed on two interstate operators that did not implement IM plans.

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

Evaluator Notes:

Ohio has issued fines for Northeast Ohio (14-1639-GA-GPS), Cobra Pipeline (14-1640-GA-GPS), Columbia Gas of Ohio (15-1351-GA-GPS). These fines totaled \$12,500.



7 General Comments:
Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

There were no issues identified in Part D of the Program Evaluation.

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



PART E - Incident 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:

Yes, the procedure is located in the Gas Pipelines Safety Inspection Plan, pages 8-9.

- 2 Does state have adequate mechanism to receive and respond to operator reports of incidents, 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:

Ohio has a 24-hour hot line. Telephonic notice criteria included in the Administrative Code 4901:1-16-05. Documentation recorded on the Telephonic Notice of Incidents and Service Failures.

- 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:

Yes, documentation recorded on the Telephonic Notice of Incidents and Service Failures.

- 4 Were all incidents 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 when appropriate Yes No Needs Improvement

Evaluator Notes:

Reviewed incident investigation report for Duke Energy when contractor failed to properly locate gas line. Investigation was thoroughly investigated and documented with conclusions and recommendations.

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

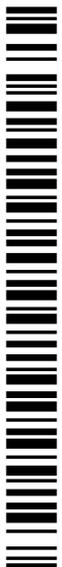
Evaluator Notes:

Yes, determined violations for the Upper Arlington explosion.(Columbia Gas of Ohio)

- 6 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 report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

In some instances the Eastern Region may ask the State of Ohio to assist in an incident investigation. Ohio will review submitted incident reports for accuracy and completeness.



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

Evaluator Notes:

Yes, sharing information at the NAPS regional meetings and at OGA Technical Seminar.

8 General Comments:
Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

There were no issues identified in Part E of the program evaluation.

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



PART F - Damage Prevention

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

Evaluator Notes:
Yes, procedure is contained in Damage Prevention form, page 3.

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

Evaluator Notes:
Yes, procedure is contained in Damage Prevention form, pages 2-3.

- | | | | |
|----------|--|---|---|
| 3 | 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.)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:
Yes, ORC 3781.34 Underground Technical Committee to provide enforcement capabilities for the State Damage Prevention Law as of January 1, 2016. See results of PHMSA survey on the application of the 9 elements.

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

Evaluator Notes:
DIRT ? promoted by Ohio Utilities Protection Service. Reviewed data from the Ohio State Pipeline Safety Program Performance Metrics on the PHMSA website.

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

Evaluator Notes:
There were no issues identified in Part F of program evaluation.

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 OnlyInfo Only
 Info Only = No Points

Name of Operator Inspected:
 Columbia Gas of Ohio; Pike Natural Gas; Duke; and Vectren.
 Name of State Inspector(s) Observed:
 Paul Hollinger, Mike Purcell, Sam Hollenball, and Scott Landon.
 Location of Inspection:
 Chillicothe, OH, Hillsboro, OH, Cincinnati, OH, and Fairborn, OH.
 Date of Inspection:
 6/30/2016, 10/18/2016, 10/19/2016, and 10/20/2016.
 Name of PHMSA Representative:
 Clint Stephens - Jim Anderson

Evaluator Notes:

Date	Inspector	Operator	Location
(1) 6/30/2016	Paul Hollinger	Columbia Gas of Ohio	Chillicothe, OH
(2) 10/18/2016	Mike Purcell	Pike Natural Gas	Hillsboro, OH
(3) 10/19/2016	Sam Hollenball	Duke	Cincinnati, OH
(4) 10/20/2016	Scott Landon	Vectren	Fairborn, OH

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:

- (1) Yes - 2 company employees present(Columbia Gas)
- (2) Yes - Kirk Seeling (Pike Natural Gas)
- (3) Yes - 11 company employees present
- (4) Yes - 4 company employees present

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:

- (1) Yes
- (2) Yes
- (3) Yes
- (4) Yes

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

Evaluator Notes:

- (1) Yes
- (2) Yes
- (3) Yes
- (4) 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.) 1 1
 Yes = 1 No = 0

Evaluator Notes:

- (1) Records review only.(Columbia Gas)
- (2) Yes
- (3) Yes
- (4) Yes



6	Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) Yes = 2 No = 0 Needs Improvement = 1	2	2
	a. Procedures	<input checked="" type="checkbox"/>	
	b. Records	<input checked="" type="checkbox"/>	
	c. Field Activities	<input checked="" type="checkbox"/>	
	d. Other (please comment)	<input type="checkbox"/>	

Evaluator Notes:
 (1) Records review only.(Columbia Gas)
 (2) Yes
 (3) Yes
 (4) Yes

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

Evaluator Notes:
 (1) Yes
 (2) Yes
 (3) Yes
 (4) Yes

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) Yes = 1 No = 0	1	1
----------	---	---	---

Evaluator Notes:
 (1) Inspection was not completed.(Columbia Gas)
 (2) Yes and asked question about abnormal operation conditions
 (3) Yes and asked question about abnormal operation conditions
 (4) Yes and asked question about abnormal operation conditions

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

Evaluator Notes:
 (1) NA - none found
 (2) NA - none found
 (3) NA - none found
 (4) NA - none found

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 = No Points	Info Only	Info Only
	a. Abandonment	<input type="checkbox"/>	
	b. Abnormal Operations	<input type="checkbox"/>	
	c. Break-Out Tanks	<input type="checkbox"/>	
	d. Compressor or Pump Stations	<input type="checkbox"/>	
	e. Change in Class Location	<input type="checkbox"/>	
	f. Casings	<input type="checkbox"/>	
	g. Cathodic Protection	<input checked="" type="checkbox"/>	
	h. Cast-iron Replacement	<input type="checkbox"/>	
	i. Damage Prevention	<input type="checkbox"/>	
	j. Deactivation	<input type="checkbox"/>	

- 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:

Those areas of inspection that were observed are checked above. There were no issues.

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



PART H - Interstate Agent State (If Applicable)

Points(MAX) Score

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

Evaluator Notes:
Yes, Ohio used Inspection Assistant (IA) for all interstate inspections.

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

Evaluator Notes:
Yes, results documented in IA.

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

Evaluator Notes:
Yes.

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

Evaluator Notes:
Ohio did not identify any probable violations in 2015. They did follow up on violations identified in 2014 (Columbia Pipeline Group).

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:
None identified in 2015.

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:
None identified in 2015.

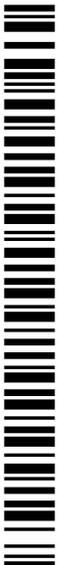
7 Did the state initially submit documentation to support compliance action by PHMSA on probable violations? 1 NA
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
None identified in 2015.

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

Evaluator Notes:
Contacted Byron Coy, PHMSA Eastern Region Director, on October 26, 2016 to discuss Ohio's quality of work as an interstate agent. Byron stated that Ohio had a good working relationship with the Eastern Region and that there were no issues with their work.

Total points scored for this section: 4



Total possible points for this section: 4



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:
Ohio is certified under 60105.

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:
Ohio is certified under 60105.

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:
Ohio is certified under 60105.

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:
Ohio is certified under 60105.

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:
Ohio is certified under 60105.

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:
Ohio is certified under 60105.

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

Evaluator Notes:
Ohio is certified under 60105.

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

