



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

1200 New Jersey Avenue SE
Washington DC 20590

2017 Gas State Program Evaluation

for

IOWA UTILITIES BOARD

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)



2017 Gas State Program Evaluation -- CY 2017

Gas

State Agency: Iowa

Agency Status:

Date of Visit: 08/27/2018 - 08/30/2018

Agency Representative: Beverly Ohman, Manager of Safety and Engineering

PHMSA Representative: Don Martin

Rating:

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

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

Name/Title: Geri D. Huser, Chair

Agency: Iowa Utility Board

Address: 1375 East Court Avenue, Room 69

City/State/Zip: Des Moines, Iowa 50319

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 2017 (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
B	Program Inspection Procedures	13	13
C	Program Performance	43	43
D	Compliance Activities	15	15
E	Incident Investigations	6	6
F	Damage Prevention	8	8
G	Field Inspections	11	11
H	Interstate Agent State (If Applicable)	5	5
I	60106 Agreement State (If Applicable)	0	0
TOTALS		111	110
State Rating		99.1

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 | 0.5 |
|----------|---|---|-----|

Evaluator Notes:

The operator and unit information on Attachment 1 was supported by documentation except for the number of private distribution units that were inspected during CY2017. Attachment 1 showed 5 operators and 13 inspection units inspected during CY2017. Five operator inspections were scheduled but four were actually completed prior to December 31, 2017 which also resulted in 12 units inspected. The IUB should request a correction to show that four inspection units were inspected during CY2017. One half point is deducted.

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

Evaluator Notes:

The inspection person-days were consistent with supporting documentation. No issues found.

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

Evaluator Notes:

The number of units matched between Attachment 1 and Attachment 3. No issues found.

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|----------|--|---|---|
| 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 was one reportable incident listed on Attachment 4. This was an incident reported by an interstate gas transmission pipeline operator. Since the IUB is an Interstate Agent it is appropriate for the IUB to list it. No incident reports were listed for intrastate operators which is consistent with the information contained in PHMSA's Pipeline Data Mart (PDM).

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|----------|--|---|-----|
| 5 | Accuracy verification of Compliance Activities - Progress Report Attachment 5
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 0.5 |
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Evaluator Notes:

There were three errors found on Attachment 5. The number of carryover Probable Violations (PVs) from CY2016 was incorrect. The PVs corrected during CY2017 was incorrect. The two noted errors caused the number of PVs outstanding at the end of year was incorrect. The IUB should request that the Progress Report be revised to reflect the correct numbers. One half point was deducted.

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

Evaluator Notes:

Most records are in electronic files. No issues found; however, the listing of records on Attachment 6 should be reviewed prior to the 2018 Progress Report submittal to describe which records are in electronic or hardcopy form.

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|----------|--|---|---|
| 7 | 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:

No issues identified.



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

Evaluator Notes:
No issues identified.

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:
No issues identified; however it should be noted that the Performance Plan should be reviewed and revised, if necessary, each year.

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

Evaluator Notes:
A.1 - The operator and unit information on Attachment 1 was supported by documentation except for the number of private distribution units that were inspected during CY2017. Attachment 1 showed 5 operators and 13 inspection units inspected during CY2017. Five operator inspections were scheduled but four were actually completed prior to December 31, 2017 which also resulted in 12 units inspected. The IUB should request a correction to show that four inspection units were inspected during CY2017. One half point was deducted.
A.5 - There were three errors found on Attachment 5. The number of carryover Probable Violations (PVs) from CY2016 was incorrect. The PVs corrected during CY2017 was incorrect. The two noted errors caused the number of PVs outstanding at the end of year was incorrect. The IUB should request that the Progress Report be revised to reflect the correct numbers. One half point was deducted.

Total points scored for this section: 9
Total possible points for this section: 10



PART B - Program Inspection Procedures

Points(MAX) Score

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- | | | | |
|----------|--|---|---|
| 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:

The IUB's SAFETY & ENGINEERING SECTION PIPELINE SAFETY PROGRAM INSPECTION AND COMPLIANCE PROCEDURES were reviewed. Element 4, Paragraph (a. of the procedures describes Standard Inspection procedures. Element 3 describes the Pre-Inspection, Inspection and Post Inspection activities to be used for all types of inspections. No issues found.

- | | | | |
|----------|--|---|---|
| 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. | 1 | 1 |
|----------|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The IUB's SAFETY & ENGINEERING SECTION PIPELINE SAFETY PROGRAM INSPECTION AND COMPLIANCE PROCEDURES were reviewed. Element 4, Paragraph (d. of the procedures describes IMP and DIMP Inspection procedures. Element 3 describes the Pre-Inspection, Inspection and Post Inspection activities to be used for all types of inspections. No issues found.

- | | | | |
|----------|--|---|---|
| 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:

The IUB's SAFETY & ENGINEERING SECTION PIPELINE SAFETY PROGRAM INSPECTION AND COMPLIANCE PROCEDURES were reviewed. Element 4, Paragraph (e. of the procedures describes Operator Qualification (OQ) Inspection procedures. Element 3 describes the Pre-Inspection, Inspection and Post Inspection activities to be used for all types of inspections. No issues found.

- | | | | |
|----------|---|---|---|
| 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:

The IUB's SAFETY & ENGINEERING SECTION PIPELINE SAFETY PROGRAM INSPECTION AND COMPLIANCE PROCEDURES were reviewed. Element 4, Paragraph (g. of the procedures describes Damage Prevention Inspection procedures. Element 3 describes the Pre-Inspection, Inspection and Post Inspection activities to be used for all types of inspections. No issues found.

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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:

The IUB's SAFETY & ENGINEERING SECTION PIPELINE SAFETY PROGRAM INSPECTION AND COMPLIANCE PROCEDURES were reviewed. Element 4, Paragraph (c. of the procedures describes Operator Training procedures. Element 3 describes the Pre-Inspection, Inspection and Post Inspection activities to be used for all types of inspections. No issues found.

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:

The IUB's SAFETY & ENGINEERING SECTION PIPELINE SAFETY PROGRAM INSPECTION AND COMPLIANCE PROCEDURES were reviewed. Element 4, Paragraph (b. of the procedures describes Construction Inspection procedures. Element 3 describes the Pre-Inspection, Inspection and Post Inspection activities to be used for all types of inspections. No issues found.

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

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

Evaluator Notes:

The IUB's SAFETY & ENGINEERING SECTION PIPELINE SAFETY PROGRAM INSPECTION AND COMPLIANCE PROCEDURES were reviewed. Element 2 of the procedures describes factors to be considered for priority and scheduling. The IUB's PROCEDURES FOR SCHEDULING PIPELINE INSPECTIONS states "Risk is accounted for in the inspection schedule through more frequent inspection of small operator units, an aggressive follow-up inspection program, and visits to new operators or personnel. Iowa does not have operators or inspection units with histories, activities, or high risk that would justify extraordinary inspection frequency or conduct. Additional inspections may be conducted if a need is identified. In addition or as an alternative to additional inspections, periodic reports may be required from operators." The IUB's inspection units appear to be appropriate.

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

Evaluator Notes:

The IUB has generally complied with the requirements of Part B of this evaluation.

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):
 524.30
 B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
 220 X 5.07 = 1114.85
 Ratio: A / B
 524.30 / 1114.85 = 0.47
 If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0
 Points = 5

Evaluator Notes:

The IUB's ratio for CY2017 was 0.47 which exceeded the minimum required. No issues identified.

- 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:

Upon reviewing reports queried from PHMSA Training and Qualification Division's SABA database no training deficiencies were found.

No outside training was received by the inspectors.

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

Evaluator Notes:

During CY2017, Don Stursma was Program Manager for a portion of the year prior to retirement. Cynthia Munyon was named Interim Program Manager for the remainder of the year but retired prior to this evaluation. Beverly Ohman was named Program Manager after December 31, 2017. She was not involved in the CY2017 program; therefore, this question is not applicable for this evaluation.

- 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:

The IUB responded in 57 days. The response addressed PHMSA's concern about incident investigations.

- 5** Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5 1 1
 Yes = 1 No = 0

Evaluator Notes:

Yes, safety seminar was conducted with a TQ representative in 2016.



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	5	5
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Evaluator Notes:

Upon a review of randomly selected inspection reports completed during CY2017 there were no issues identified involving the inspection interval of the operators or units.

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:

The IUB uses PHMSA's form except for Standard Inspections of gas distribution and transmission pipelines. The IUB created its own form for Standard Inspections. Upon a review of the two Standard Inspection forms no code requirements were found to be omitted.

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	NA
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Evaluator Notes:

The last segment of cast iron was removed in 2015. There is no known cast iron pipe remaining in Iowa.

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	NA
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Evaluator Notes:

The last segment of cast iron was removed in 2015. There is no known cast iron pipe remaining in Iowa.

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
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Evaluator Notes:

The IUB has a question on the Standard Inspection Form for Gas Distribution operators. Upon a review of randomly selected Standard Inspections the results to this question were documented.

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
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Evaluator Notes:

The IUB has a question on the Standard Inspection Form for Gas Distribution operators. Upon a review of randomly selected Standard Inspections the results to this question were documented.

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:

Yes, annual reports are reviewed for accuracy. Operators are notified of any errors found and requested to amend their submittals.



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|-----------|---|---|---|
| 13 | 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:

The IUB has a question on the Standard Inspection Form for Gas Transmission operators. Upon a review of randomly selected Standard Inspections the results to this question were documented.

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|-----------|---|---|---|
| 14 | 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:

The IUB conducted 48 drug and alcohol inspections in CY2017.

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|-----------|---|---|---|
| 15 | 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 |
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Evaluator Notes:

The IUB spent 35 inspection person days on Operator Qualification inspections in CY2017.

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| 16 | 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). (Are the State's largest operators programs being contacted or reviewed annually? Are replies to Operator IM notifications addressed? (formerly part of Question C-13)). 49 CFR 192 Subpart 0
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

The IUB spent 30.5 inspection person days on transmission pipeline integrity management inspections (IMP) during CY2017.

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| 17 | 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). (Are the State's largest operators programs being contacted or reviewed annually?). 49 CFR 192 Subpart P
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|

Evaluator Notes:

The IUB spent 12.5 inspection person days on distribution pipeline integrity management inspections (DIMP) during CY2017.

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|-----------|---|---|---|
| 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. PAPEI Effectiveness Inspections should be conducted every four years by operators. 49 CFR 192.616
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

No issues were found with the IUB's handling of Public Awareness Programs. Scheduling of the next round of effectiveness reviews will need to be a focus near term.

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

Evaluator Notes:



Yes, Iowa has a website for pipeline safety. Anyone can access the Iowa electronic filing system to review information including all inspections and reports.

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

There were no Safety Related Condition Reports filed by an intrastate operator in Iowa during CY2017.

21	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? Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

The IUB has a question on the IAC inspection form. Upon a review of randomly selected inspections the results to this question were documented.

22	Did the state participate in/respond to surveys or information requests from NAPSRS or PHMSA? Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

No instances were found where the IUB did not comply.

23	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. No = 0 Needs Improvement = .5 Yes = 1	1	1
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Evaluator Notes:

There are five waivers/special permits approved by the IUB. The IUB relaxed the requalification timeframe for plastic joining by allowing up to 15 months for requalification. However, the failure rate which automatically requires requalification was reduced from three per year to one per year (more stringent). The IUB has captured the more stringent requirement on plastic joining on its Standard Inspection Form for Gas Distribution thereby verifying this condition during Standard Inspections. 192.285 has been amended since the issuance of this waiver. The IUB should review 192.285 to verify that the amendment did not make this waiver obsolete. If it is determined that the waiver is no longer needed, the IUB should communicate the status to PHMSA's Regulations Division in Washington, DC.

No other waivers were found to have conditions requiring verification. The IUB has begun an initiative to identify if any of the waivers are no longer valid.

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

Yes. Cynthia Munyon attended.

25	Discussion on State Program Performance Metrics found on Stakeholder Communication site - http://primis.phmsa.dot.gov/comm/states.htm No = 0 Needs Improvement = 1 Yes = 2	2	2
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|----|---|--------------------------------------|--------------------------|---|
| a. | Discussion of Potential Accelerated Actions (AA's) based on any negative trends | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | NTSB P-11-20 Meaningful Metrics | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

? Damage Prevention Program: The gas distribution damages per 1,000 tickets trended downward from approximately 3.1 damages per 1,000 tickets to approximately 2.3 damages per 1,000 tickets in 2015. The trend has increased to approximately 2.7 damages per 1,000 tickets in 2017. The damages per 1000 locates is a focus area to improve metrics whose trend is basically flat. Problem solving analysis has been initiated to identify focus areas for mitigating actions development.

- ? Inspection Activity: a. Gas Pipelines: The Inspection Days per 1,000 miles of pipeline have trended in a positive direction since 2014. No mitigating actions are warranted.
LPG Units: With only two LPG inspection units in Iowa, trending of this metric are difficult to analyze. Ensuring the units are inspected within established intervals is a better indicator of performance. No mitigating actions are warranted.
- ? Inspector Qualification: The trend has moved in a negative direction since 2013. A focus and commitment to completion of required courses by staff replacements will reverse the trend.
- ? Leak Management: Leak repairs per 1,000 miles are on a slight positive trend with hazardous leaks repaired per 1,000 miles relatively flat. The number of known leaks outstanding per 1,000 miles has trended in a negative direction since 2011 which may need some attention if the trend continues.
- ? Enforcement (PHMSA's Evaluations): The IUB's performance has improved on this metric over the last four years including a perfect score for 2016. Continued follow through with its enforcement process of non-compliance findings will ensure satisfactory performance of this metric.
- ? Incident Investigation: There was a considerable drop in this metric in 2016 which was a result of four evaluation points deducted for an incident that was not investigated and a report not completed. The proper follow through with the IUB's incident investigation procedures should result in improvement related to this metric.

26 Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT) Has the State updated SICT data? 1 1
No = 0 Yes = 1

Evaluator Notes:

There no significant issues found during the review of SICT results performed in CY2017.

27 Did the State verify Operators took appropriate action regarding Pipeline Flow Reversals, Product Changes and Conversions to Service? See ADP-2014-04 1 NA
Needs Improvement = .5 No = 0 Yes = 1

Evaluator Notes:

There were no know flow reversals known on gas transmission pipelines.

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

Evaluator Notes:

The IUB has generally complied with the requirements of Part C of this evaluation.

Total points scored for this section: 43
Total possible points for this section: 43



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
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"/> |
| c. | Procedures regarding closing outstanding probable violations | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

The IUB's PIPELINE SAFETY ENFORCEMENT PROCESS document was reviewed. Enforcement steps were outlined, operator notification aspects were described and defined, resolution process was described along with the process for report closure.

- | | | | |
|----|--|--------------------------------------|--|
| 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 | 4 | 4 |
| a. | Were compliance actions sent to company officer or manager/board member if municipal/government system? | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. | Document probable violations | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| c. | Resolve probable violations | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| d. | Routinely review progress of probable violations | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| e. | Within 30 days, conduct a post-inspection briefing with the owner or operator of the gas or hazardous liquid pipeline facility inspected outlining any concerns; and | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| f. | Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

Upon a review of randomly selected inspection reports completed in 2017 there were no deficiencies found regarding (a., (b, (c, (d, (e or (f.

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

Evaluator Notes:

Upon a review of randomly selected inspection reports completed in 2017 there were no instances found where the IUB failed to issue compliance action when probable violations were identified.

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

Evaluator Notes:

Yes. Operators were given opportunity to dispute any probable violations alleged in compliance notices. Operators may also request a hearing of their case.

- | | | | |
|---|---|---|---|
| 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 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Yes. The process was explained by the program managers. Along with other considerations, repeat violations or violations resulting in incidents are taken into account.

- | | | | |
|---|--|---|---|
| 6 | Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations? | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The IUB has issued civil penalties in past history but none since 2012.

7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The IUB has generally complied with the requirements of Part D of this 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:

Element 4, Paragraph (f., describes the procedures for responding and investigating incidents. Procedures should add three areas to be addressed in the investigation report; 1. Observations and document review, 2. Contributing factors 3. Recommendations to prevent reoccurrence.

- 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:

The Iowa Utilities Board (IUB) has established by regulations the rotating additional duty of Duty Officer. The Duty Officer will receive notices of incidents and relay the information to the appropriate section, ie pipeline safety. The telephone number is in the regulation.

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

Evaluator Notes:

PHMSA's Pipeline Data Mart shows no reportable incidents by an intrastate operator in Iowa during CY2017. There was on incident reported by an interstate gas transmission operator during 2017. The IUB is an Interstate Agent. At the time of this incident, PHMSA's Accident Investigation Division (AID) had taken over incident investigation responsibility from the Region Offices. The IUB complied with AID instructions.

- 4 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? 3 NA
 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:

There were no reportable incidents by an intrastate operator in Iowa during CY2017. The IUB was not instructed by the AID to conduct an investigation of the one interstate incident reported during 2017. The incident involved third party damage when farming activity resulted in a riser being damaged resulting in a release of gas. Damages exceeded \$50,000.

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

Evaluator Notes:

No probable violations related to incidents were identified during 2017.

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

Evaluator Notes:



The IUB complied with AID instructions and needs during 2017.

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:

The IUB has presented lessons learned at past NAPS Central Region Meetings.

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

Evaluator Notes:

The IUB has generally complied with the requirements of Part E of this evaluation.

Total points scored for this section: 6
Total possible points for this section: 6



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:

A question is on the Operation and Maintenance (O&M) Procedures inspection form that inspects the procedures about drilling/boring near an operator's pipeline. It is reviewed when conducting an inspection of operators' O&M Procedures.

- | | | | |
|----------|--|---|---|
| 2 | Did the state inspector verify pipeline operators are following their 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:

There are several questions on the O&M procedures inspection form related to its Damage Prevention program required by 192.614.

- | | | | |
|----------|--|---|---|
| 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:

The IUB is a partner with the Iowa One-Call System. The IUB participates in activities of the Damage Prevention Councils. The IUB opened INU-2017-0001 which brought together excavation stakeholders with utilities, Attorney General's office and Iowa One-Call System to discuss changes in IUB regulations related to damage prevention. One objective was to increase effectiveness of procedures related to One Call. The initiative is still in progress.

- | | | | |
|----------|--|---|---|
| 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:

The IUB reviews the data collected for the Performance Metric in PRIMUS which originates from operators' annual reports. It reviews pipeline damages per 1000 locates to identify trends and problem areas that need improvement.

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

Evaluator Notes:

The IUB has generally complied with the requirements of Part F of this 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 Only Info Only
 Info Only = No Points
 Name of Operator Inspected:
 MidAmerican Energy - Sioux City Zone (Inspection Unit)
 Name of State Inspector(s) Observed:
 David McCann
 Location of Inspection:
 Urbandale, IA
 Date of Inspection:
 8/29/2018
 Name of PHMSA Representative:
 Don Martin

Evaluator Notes:
 The IUB is conducting a Standard Inspection of MidAmerican's Sioux City Inspection Unit. The inspection began on 8/24/2018. On this day, 8/29/2018, the inspector was inspecting operating and maintenance records at Mid American's office. The inspection will not be completed until the following week.

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:
 Yes, MidAmerican was notified by email on July 25, 2018. Brian Phelps, Gas Compliance and Tech Support, was present during the inspection. The previous Standard Inspection of the Sioux City inspection unit was conducted in 2015.

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:
 Yes, the inspector used the Inspection Agent software to develop a Standard Inspection question set for gas distribution. During the observation visit he followed through the question set to guide him through the inspection.

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

Evaluator Notes:
 Yes, results were entered into the Inspection Agent form as he progressed through the inspection.

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 NA
 Yes = 1 No = 0

Evaluator Notes:
 No testing equipment was required during this portion of the inspection.

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:
 No issues were identified with the scope of the inspection.



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
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Evaluator Notes:
Yes. No issues with knowledge.

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
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Evaluator Notes:
Yes, for the items that were covered on this day.

9	During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable) Yes = 1 No = 0	1	1
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Evaluator Notes:
The inspector communicated that no probable violations were found during this day of inspection but there follow up was needed on a couple of items in order to make a final determination.

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
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Info Only = No Points

- | | |
|--------------------------------------|-------------------------------------|
| a. Abandonment | <input type="checkbox"/> |
| b. Abnormal Operations | <input checked="" 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 type="checkbox"/> |
| h. Cast-iron Replacement | <input type="checkbox"/> |
| i. Damage Prevention | <input type="checkbox"/> |
| j. Deactivation | <input type="checkbox"/> |
| k. Emergency Procedures | <input checked="" type="checkbox"/> |
| l. Inspection of Right-of-Way | <input type="checkbox"/> |
| m. Line Markers | <input type="checkbox"/> |
| n. Liaison with Public Officials | <input checked="" type="checkbox"/> |
| o. Leak Surveys | <input type="checkbox"/> |
| p. MOP | <input type="checkbox"/> |
| q. MAOP | <input checked="" type="checkbox"/> |
| r. Moving Pipe | <input type="checkbox"/> |
| s. New Construction | <input type="checkbox"/> |
| t. Navigable Waterway Crossings | <input type="checkbox"/> |
| u. Odorization | <input checked="" type="checkbox"/> |
| v. Overpressure Safety Devices | <input type="checkbox"/> |
| w. Plastic Pipe Installation | <input type="checkbox"/> |
| x. Public Education | <input type="checkbox"/> |
| y. Purging | <input type="checkbox"/> |
| z. Prevention of Accidental Ignition | <input type="checkbox"/> |
| A. Repairs | <input type="checkbox"/> |
| B. Signs | <input type="checkbox"/> |



- 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:

Other items included Pressure Test Records, Uprating projects, O&M Review documentation and patrolling of above ground main locations. The IUB generally complied with the requirements of Part G of this evaluation.

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

Evaluator Notes:

The following is a response from PHMSA's Central Region Office:
"In the past, Iowa has been very reluctant to utilize the Inspection Assistant program. This past year, there was a change in management and the new management is on board with using IA. They have requested additional training from CR to use it. I do not see this as an issue anymore. For the LNG inspection, they did use the IA."

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

Evaluator Notes:

The following is a response from PHMSA's Central Region Office:
"I can only comment on the LNG facility that was inspected. They did inspect the LNG as directed by the inspection plan."

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

Evaluator Notes:

The following is a response from PHMSA's Central Region Office:
"For the LNG inspection, yes they did."

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

Evaluator Notes:

The following is a response from PHMSA's Central Region Office:
"There were some potential procedural issues noted. However, the operator was able to follow-up and provide adequate information so that no letter was needed."

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

Evaluator Notes:

The following is a response from PHMSA's Central Region Office:
"N/A."

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

Evaluator Notes:

The following is a response from PHMSA's Central Region Office:
"The state provided the concerns within 60 days. After review, the concerns were resolved and no NPOV needed to be sent."

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

Evaluator Notes:

The following is a response from PHMSA's Central Region Office:
"NA."



8 General Comments:
Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

The IUB generally complied with the requirements of Part H of this evaluation.

Total points scored for this section: 5
Total possible points for this section: 5



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:
The IUB does not have a 60106 agreement with PHMSA.

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:
The IUB does not have a 60106 agreement with PHMSA.

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:
The IUB does not have a 60106 agreement with PHMSA.

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:
The IUB does not have a 60106 agreement with PHMSA.

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:
The IUB does not have a 60106 agreement with PHMSA.

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:
The IUB does not have a 60106 agreement with PHMSA.

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

Evaluator Notes:
The IUB does not have a 60106 agreement with PHMSA.

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

