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

1200 New Jersey Avenue SE
Washington DC 20590

2018 Hazardous Liquid State Program Evaluation

for

INDIANA UTILITY REGULATORY COMMISSION

Document Legend
PART:

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

2018 Hazardous Liquid State Program Evaluation -- CY 2018
Hazardous Liquid

State Agency: Indiana
Rating:
Agency Status:
60105(a): Yes **60106(a):** No **Interstate Agent:** No
Date of Visit: 05/13/2019 - 05/17/2019
Agency Representative: William Boyd
Director, Pipeline Safety
PHMSA Representative: Clint Stephens
State Liaison
Commission Chairman to whom follow up letter is to be sent:
Name/Title: Mr. Jim Huston, Chairman
Agency: Indiana Utility Regulatory Commission
Address: 101 West Washington Street, Suite 1500
City/State/Zip: Indianapolis, IN 46204-3407

INSTRUCTIONS:

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2018 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. A deficiency in any one part of a multiple part question should be scored as needs improvement. Determine the answer to the question then select the appropriate point value. If a state receives less then the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual progress report attachments provide the basis for determining the state's pipeline safety grant allocation.

Scoring Summary

PARTS		Possible Points	Points Scored
A	Progress Report and Program Documentation Review	10	10
B	Program Inspection Procedures	13	13
C	Program Performance	43	42
D	Compliance Activities	15	15
E	Accident Investigations	11	11
F	Damage Prevention	8	8
G	Field Inspections	12	12
H	Interstate Agent State (if applicable)	0	0
I	60106 Agreement State (if applicable)	0	0
TOTALS		**112**	**111**

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	1

Evaluator Notes:

There seems to be no problem with accuracy of jurisdictional authority and operator/inspection units data from Attachment 1 of Progress Report.

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

Evaluator Notes:

No problem with accuracy of inspection days from Attachment 2 of Progress Report.

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:

There seems to be no problem with accuracy of operators and operators inspection units in State from Attachment 3 of 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:

Checked data with PDM and information is correct as listed in Attachment 4 of Progress Report.

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

Evaluator Notes:

Accuracy of compliance activities seems correct for Attachment 5 of Progress Report.

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

Evaluator Notes:

The program files were well organized and accessible through their Share Point and CRM 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:

The employee listing and completed training was verified through TQ blackboard.

8	Verification of Part 195,198,199 Rules and Amendments - Progress Report Attachment 8 Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

Indiana has tried to adopt all rules and amendments. Civil penalties do match PHMSA.

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:

The State of Indiana had nine inspection days on hazardous liquids.

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10 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues in Part A.

Total points scored for this section: 10

Total possible points for this section: 10

PART B - Program Inspection Procedures

#	Question	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:

Standard inspections which include the pre-inspection and inspection activities are detailed on pages 30 thru 33 of the Indiana Regulatory Commission Pipeline Safety Division Program Manual. Post Inspection Activities are detailed on pages 50 thru 52.

#	Question	Points(MAX)	Score
2	IMP Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

The pre-inspection and inspection activities are detailed on pages 30 thru 33 of the Indiana Regulatory Commission Pipeline Safety Division Program Manual. The IMP inspection procedures are included on page 48.

#	Question	Points(MAX)	Score
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:

The pre-inspection and inspection activities are detailed on pages 30 thru 33 of the Indiana Regulatory Commission Pipeline Safety Division Program Manual. The OQ procedures are included on page 44.

#	Question	Points(MAX)	Score
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:

The pre-inspection and inspection activities are detailed on pages 30 thru 33 of the Indiana Regulatory Commission Pipeline Safety Division Program Manual. The Damage Prevention inspection procedures on page 47 only outlines which form to use; whereas, more detail procedures are listed One-Call Law.

#	Question	Points(MAX)	Score
5	Any operator training conducted should be outlined and appropriately documented as needed. Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

On site operator training is included on page 46 of the Indiana Regulatory Commission Pipeline Safety Division Program Manual .

#	Question	Points(MAX)	Score
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:

The pre-inspection and inspection activities are detailed on pages 30 thru 33 of the Indiana Regulatory Commission Pipeline Safety Division Program Manual. The construction inspection procedures are included on pages 41 thru 43.

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

	Yes	No	Needs Improvement
a. Length of time since last inspection (Within five year interval)	◉	○	○
b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)	◉	○	○
c. Type of activity being undertaken by operators (i.e. construction)	◉	○	○
d. Locations of operators inspection units being inspected - (HCA's, Geographic area, Population Density, etc)	◉	○	○
e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors)	◉	○	○
f. Are inspection units broken down appropriately?	◉	○	○

Evaluator Notes:

The inspection priorities of each operator is outlined on pages 16 thru 27 of the Indiana Regulatory Commission Pipeline Safety Division Program Manual.

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

Evaluator Notes:

There were no issues in Part B.

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):
9.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 0.02 = 3.38

Ratio: A / B
9.00 / 3.38 = 2.66

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

Evaluator Notes:

9/220(.02) = 2.05 > .38

		Points(MAX)	Score
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

		Yes	No	Needs Improvement
a.	Completion of Required OQ Training before conducting inspection as lead?	◉	○	○
b.	Completion of Required IMP Training before conducting inspection as lead	◉	○	○
c.	Root Cause Training by at least one inspector/prgram manager	◉	○	○
d.	Note any outside training completed	◉	○	○
e.	Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector.	◉	○	○

Evaluator Notes:

All lead inspectors and program manager have fulfilled TQ Training requirements. New inspectors are in process of fulfilling training requirements.

		Points(MAX)	Score
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. The pipeline safety program manager indicated adequate knowledge of PHMSA program and regulations.

		Points(MAX)	Score
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. State did respond to Chairman's letter within 60 days, and correct or address any noted deficiencies.

		Points(MAX)	Score
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:

Indiana had its last pipeline safety seminar on July 10 thru 12, 2018.

		Points(MAX)	Score
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:

A Liquid IMP was performed on Country Mark in December 2013. A current inspection is scheduled for June 2019. Did not meet 5 year interval for inspections.

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 inspection report number 10579. This was a cathodic survey inspection, not a detailed standard inspection. Inspector did complete all portions of form.

8	Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 195.402(c)(5)? Yes = 1 No = 0	1	1

Evaluator Notes:

Yes. The procedure question is included in the IA PHMSA Form 3 Standard Hazardous Liquids inspection form, question 2, page 3.

9	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:

Yes. Indiana has a checklist for reviewing the operator annual reports for any discrepancies, along with analyzing the data from Incident/Accident reports for trends and operator issues which is then promulgated in their risk model.

10	Has state confirmed intrastate 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. Indiana does an annual review by checking data from annual reports and PDM.

11	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. Indiana is using the PHMSA long form for drug and alcohol tests as required by regulations.
A comprehensive D&A inspection was performed on Country Mark in 2017.

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

Evaluator Notes:

An OQ Program inspection was recently performed in 2019. The previous OQ inspection was 2015.

13	Is state verifying operator's hazardous liquid integrity management (L IMP) Programs are up to date? This should include a previous review of LIMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review should take in to account program review and updates of operators plan(s). (Are the State's largest operators programs being contacted or reviewed annually? Are replies to Operator IM notifications addressed? (formerly part of Question C-10)). 49 CFR 195.452 Appendix C Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:

Indiana meets with the operator on an annual basis to discuss any significant changes with IMP Plan.

14	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 195.440 Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:

The last Public Awareness program inspection for Country Mark was performed in 2016.

15	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. Indiana communicates with stakeholders, such as, enforcement cases on State website, sending out emails to operators pertaining to State and Federal regulatory updates, and regular meetings with three big operators.

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

Evaluator Notes:

Indiana has no open SRC Reports.

17	Did the state participate in/respond to surveys or information requests from NAPSR or PHMSA? Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:

Yes. The state participated in response to surveys or information requests from NAPSR or PHMSA.

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

Evaluator Notes:

Indiana has no waivers or special permits for Country Mark.

19	Did the state attend the NAPSR National Meeting in CY being evaluated? Needs Improvement = .5 No = 0 Yes = 1	1	1

Evaluator Notes:

Yes. Program manager attended NAPSR National Meeting in 2018 in Santa Fe, New Mexico.

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

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

Evaluator Notes:

Yes. Discussed Inspector qualifications (core training, % additional training, and % 5-year retention) for gas program decreased from 2016 to 2017. They have lost staff to retirement and PHMSA. Indiana has hired new staff recently, but they have not completed core training.

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

Evaluator Notes:

Indiana needs to look at revising number due to not meeting calculated person days from SICT tool(16). Indiana had 9 inspection days from Attachment 2 of 2018 Progress Report.

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

Evaluator Notes:

An email was sent out to all operators in May 2018 notifying them of ADP.

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

Evaluator Notes:

1. A Liquid IMP was performed on Country Mark in December 2013. A current inspection is scheduled for June 2019. Did not meet 5 year interval for inspections.

2. Indiana needs to look at revising number due to not meeting calculated person days from SICT tool(16). Indiana had 9 inspection days from Attachment 2 of 2018 Progress Report..

Total points scored for this section: 42
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	4	4

Yes = 4 No = 0 Needs Improvement = 1-3

a. Procedures to notify an operator (company officer) when a noncompliance is identified — Yes ◉ No ○ Needs Improvement ○

b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns — Yes ◉ No ○ Needs Improvement ○

c. Procedures regarding closing outstanding probable violations — Yes ◉ No ○ Needs Improvement ○

Evaluator Notes:

Yes. The procedures are detailed on pages 50 thru 52 of the IURC Pipeline Safety Division Program Manual. More detail was added to Manual to explain in detail the process for monitoring progress of compliance action until closing probable violations or outstanding probable violations.

		Points(MAX)	Score
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? (Incident Investigations do not need to meet 30/90 day requirement) Chapter 5.1	4	4

Yes = 4 No = 0 Needs Improvement = 1-3

a. Were compliance actions sent to company officer or manager/board director if municipal/government system? — Yes ◉ No ○ Needs Improvement ○

b. Document probable violations — Yes ◉ No ○ Needs Improvement ○

c. Resolve probable violations — Yes ◉ No ○ Needs Improvement ○

d. Routinely review progress of probable violations — Yes ◉ No ○ Needs Improvement ○

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 ◉ No ○ Needs Improvement ○

f. Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. — Yes ◉ No ○ Needs Improvement ○

Evaluator Notes:

There was one inspection performed on Country Mark in 2018 with no probable violations.

		Points(MAX)	Score
3	Did the state issue compliance actions for all probable violations discovered?	2	2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

There were no compliance actions issued against Country Mark in 2018.

		Points(MAX)	Score
4	Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary.	2	2

Yes = 2 No = 0

Evaluator Notes:

There were no compliance actions in 2018.

		Points(MAX)	Score
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)	2	2

Yes = 2 No = 0

Evaluator Notes:

Yes. The program manager is familiar with the state process for imposing civil penalties. There were no civil penalties accessed to the one hazardous liquid operator (Country Mark).

		Points(MAX)	Score
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:

There has never been an enforcement fine levied against County Mark.

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7 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues in Part D.

Total points scored for this section: 15

Total possible points for this section: 15

PART E - Accident Investigations

Points(MAX) Score

1 Does the state have written procedures to address state actions in the event of an incident/accident? 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. The procedure is detailed in the IURC Pipeline Safety Division Incident Investigation Procedures, page 75 thru 83.

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2 Does state have adequate mechanism to receive and respond to operator reports of accidents, including after-hours reports? And did state keep adequate records of Incident/Accident notifications received? Chapter 6 2 2

Yes = 2 No = 0 Needs Improvement = 1

a. Acknowledgement of MOU between NTSB and PHMSA (Appendix D) Yes ◉ No ◯ Needs Improvement ◯

b. Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E) Yes ◉ No ◯ Needs Improvement ◯

Evaluator Notes:

Yes. The procedure is detailed in the IURC Pipeline Safety Division Incident Investigation Procedures, page 75 thru 83. Indiana has a 24 hour call in number to report a possible incident. That information is recorded on a Telephonic Report form to document whether call-in is a reportable incident and should be investigated.

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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:

After reviewing a few of the Telephonic Reports in 2018, some were not completely filled out to determine the facts to determine if pipeline safety had decided to go onsite to investigate. Staff indicated that during staff meetings that discussions were made to properly fill out forms.

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4 Were all accidents investigated, thoroughly documented, and with conclusions and recommendations? 3 3

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

a. Observations and document review Yes ◉ No ◯ Needs Improvement ◯

b. Contributing Factors Yes ◉ No ◯ Needs Improvement ◯

c. Recommendations to prevent recurrences where appropriate Yes ◉ No ◯ Needs Improvement ◯

Evaluator Notes:

The one incident was not investigated because operator had cleaned up site as soon incident had occurred.

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5 Did the state initiate compliance action for violations found during any incident/accident investigation? 1 1

Yes = 1 No = 0

Evaluator Notes:

There was no compliance actions or violations found during any incident/accident investigation in 2018.

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6 Did the state assist Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator accident reports to ensure accuracy and final report has been received by PHMSA? (validate report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Indiana was not requested by AID to assist during any incident investigation in 2018.

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

Evaluator Notes:

Yes. This information is presented during the State of State address during NAPSR Region meeting and State seminars.

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

Evaluator Notes:

There were no issues in Part E.

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

Evaluator Notes:

Yes. Question is listed on the O&M Inspection Form, question 9, page 7.

		Points(MAX)	Score
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:

Yes. Question is listed on the Damage Prevention Inspection Form.

		Points(MAX)	Score
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. Indiana's Damage Prevention Program was deemed adequate by PHMSA. Through there website, information is available for all stakeholders to obtain training and resources for CGA Best Practices.

		Points(MAX)	Score
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:

Indiana is analyzing data from annual reports to evaluate trends on the number of pipeline damages per 1,000 locate tickets.

		Points(MAX)	Score
5	General Comments: Info Only = No Points	Info Only	Info Only

Evaluator Notes:

There were no issues in Part F.

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 = No Points	Info Only	Info Only

Name of Operator Inspected:
CountryMark Refining and Logistics, LLC

Name of State Inspector(s) Observed:
Chuck Weindorf, William Boyd, Kelsey Klinger, and Mike Martin

Location of Inspection:
17710 Mule Barn Road, Westfield, IN 46074

Date of Inspection:
April 17-18, 2019

Name of PHMSA Representative:
Clint Stephens

Evaluator Notes:

The IURC conducted an OQ Program and Protocol 9 inspection on CountryMark Refining and Logistics, LLC.

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

Evaluator Notes:

Yes. The operator's representative was notified and given the opportunity to be present during the inspection.

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

Evaluator Notes:

Yes. The inspector used the OQ Form 14 (OQ Plan) and Protocol 9 (Field Inspection) as a guide during the inspection.

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

Evaluator Notes:

Yes. The inspector thoroughly documented the results of the inspection.

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

Evaluator Notes:

Yes. The inspector checked the multi-meter to verify it was calibrated after being used to test rectifier. This was done during an OQ Protocol 9 inspection.

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	☒
b.	Records	☒
c.	Field Activities	☒
d.	Other (please comment)	☐

Evaluator Notes:

The inspector reviewed the operator's OQ Plan, and OQ qualification records of employees and contractors. The inspector observed the operator perform a visual breakout tank 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

Evaluator Notes:

Yes. The inspector had adequate knowledge of the pipeline safety program and regulations.

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:

Yes. The inspector conducted an exit interview following the completion of the OQ Program inspection.

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

Evaluator Notes:

There were no probable violations found during the inspection, however, the inspector did go over items the operator needed to improve on, such as including contractors in Form 14 as affected employees.

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	☐
b.	Abnormal Operations	☒
c.	Break-Out Tanks	☒
d.	Compressor or Pump Stations	☐
e.	Change in Class Location	☐
f.	Casings	☐
g.	Cathodic Protection	☒
h.	Cast-iron Replacement	☐
i.	Damage Prevention	☐
j.	Deactivation	☐
k.	Emergency Procedures	☐
l.	Inspection of Right-of-Way	☐
m.	Line Markers	☐
n.	Liaison with Public Officials	☐
o.	Leak Surveys	☐
p.	MOP	☐
q.	MAOP	☐
r.	Moving Pipe	☐
s.	New Construction	☐
t.	Navigable Waterway Crossings	☐
u.	Odorization	☐
v.	Overpressure Safety Devices	☐
w.	Plastic Pipe Installation	☐
x.	Public Education	☐
y.	Purging	☐
z.	Prevention of Accidental Ignition	☐
A.	Repairs	☐
B.	Signs	☐
C.	Tapping	☐

D. Valve Maintenance ☐
E. Vault Maintenance ☐
F. Welding ☐
G. OQ - Operator Qualification ☒
H. Compliance Follow-up ☐
I. Atmospheric Corrosion ☒
J. Other ☐

Evaluator Notes:

The inspector observed the operator perform a rectifier check and breakout tank inspection during a Protocol 9 inspection. The inspector verified the operator followed procedures, and was able to identify any abnormal operations while performing these covered tasks.

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

PART H - Interstate Agent State (if applicable)

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

Evaluator Notes:

The IURC is not an interstate agent.

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

Evaluator Notes:

The IURC is not an interstate agent.

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

Evaluator Notes:

The IURC is not an interstate agent.

	Question	Points(MAX)	Score
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	NA

Evaluator Notes:

The IURC is not an interstate agent.

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

Evaluator Notes:

The IURC is not an interstate agent.

	Question	Points(MAX)	Score
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	NA

Evaluator Notes:

The IURC is not an interstate agent.

	Question	Points(MAX)	Score
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 IURC is not an interstate agent.

	Question	Points(MAX)	Score
8	General Comments: Info Only = No Points	Info Only	Info Only

Evaluator Notes:

The IURC is not an interstate agent.

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

PART I - 60106 Agreement State (if applicable)

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

Evaluator Notes:

The IURC does not have a 60106 Agreement.

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

Evaluator Notes:

The IURC does not have a 60106 Agreement.

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

Evaluator Notes:

The IURC does not have a 60106 Agreement.

	Question	Points(MAX)	Score
4	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 IURC does not have a 60106 Agreement.

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

Evaluator Notes:

The IURC does not have a 60106 Agreement.

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

Evaluator Notes:

The IURC does not have a 60106 Agreement.

	Question	Points(MAX)	Score
7	General Comments: Info Only = No Points	Info Only	Info Only

Evaluator Notes:

The IURC does not have a 60106 Agreement.

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