



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

1200 New Jersey Avenue SE
Washington DC 20590

2018 Gas State Program Evaluation

for

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



2018 Gas State Program Evaluation -- CY 2018

Gas

State Agency: Illinois

Agency Status:

Date of Visit: 08/20/2019 - 09/26/2019

Agency Representative: Bill Riley, Assistant Director, Safety and Reliability Division, ICC

PHMSA Representative: Don Martin

Rating:

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

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

Name/Title: Carrie Zalewski, Chairman

Agency: Illinois Commerce Commission

Address: 527 E. Capitol Avenue

City/State/Zip: Springfield, Illinois 62794-9280

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 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.

Scoring Summary

PARTS

Possible Points Points Scored

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)

10	10
13	13
47	42
15	15
10	10
8	8
12	12
0	0
0	0

TOTALS

115 110

State Rating

95.7

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:

The information for operator counts on Attachment 1 was compared to operator counts in the Pipeline Data Mart for CY2018. All counts matched except for Gas Transmission which was off by two, Attachment 1 showed 30 and the PDM showed 28. A new operator became jurisdictional during 2018 but had not received an OPID to be counted in PDM. The US Steel Granite City pipeline is counted by the ICC but an OPID has not been applied for by the operator since it is contesting jurisdictional status.

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

Evaluator Notes:

The ICC utilizes a database to account for inspection person days. The ICC has to adjust the totals for Standard Inspections that is reported out from the database. The database was reviewed and the adjustments that were made for entries into Attachment 1. The totals and adjustments were supported appropriately.

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

The unit counts for each operator type matched the counts on Attachment 1. No inaccuracies were 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 |
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Evaluator Notes:

The ICC 2018 Progress Report Attachment 4 listed two incident reported during 2018. A review of the Pipeline Data Mart confirmed the two incidents. No inaccuracies were found.

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

The year end report from the database was reviewed. The compliance data entries were supported from the database report. The ICC's compliance information includes NOPV's and NOA's.

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

The database accounts for all inspection activity. The database is structured in an organized manner. The database reporting on inspection person days ought to be enhanced so that manual adjustments do not have to be made at year end to create an accurate count.

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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 |
|---|--|---|---|

Evaluator Notes:

No issues were found in the employee listing. Training information is downloaded from PHMSA Training and Qualification's database.

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:

The ICC completed a rules docket, 16-0487, in July 2017 to complete all needed 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:

The ICC's description stated clear goals and provided an explanation of its progress. The ICC's main focus was hiring additional inspection staff, completing training of staff and increasing field activities with an increased emphasis on construction inspections.

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

Evaluator Notes:

The ICC met the requirements of Part A of this evaluation.

Total points scored for this section: 10
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 Standard Inspection Procedures are located in Section V (E starting on Page 15 of the ICC's PIPELINE SAFETY PROGRAM STANDARD OPERATING, ENFORCEMENT AND INCIDENT INVESTIGATION PROCEDURES (Procedures) ending on Page 20. Pre-Inspection activities are described in V (B on Page 13. Post inspection activities are described in Section V (R on Page 25.

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

Transmission Integrity Management Program (IMP) inspections are described in Section V (O on Page 24. Distribution Integrity Management Program (DIMP) inspections are described in Section V (Q on Page 24. Pre and Post Inspection activities are the same on Page 13 and 25.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Operator Qualification (OQ) inspections are described in Section V (I on Page 22 and 23. Pre and Post Inspection activities are the same on Page 13 and 25.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Damage Prevention inspections are described in Section V (N on Page 23 and 24. Pre and Post Inspection activities are the same on Page 13 and 25.

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

Evaluator Notes:

Operator Training is described in Section V (M on Page 23. Pre and Post Inspection activities are the same on Page 13 and 25.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Design and Construction inspections are described in Section V (H on Pages 20 to 22. Pre and Post Inspection activities are the same on Page 13 and 25.

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|----|---|--------------------------------------|--|
| 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 <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. | Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| c. | Type of activity being undertaken by operators (i.e. construction) | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| d. | Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc) | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| e. | Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors) | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| f. | Are inspection units broken down appropriately? | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

The ICC utilizes four considerations to establish inspection priorities, i.e., Risk Model, Length of time since last inspection, construction activity level and analysts (inspector) review of past inspection data. Development of priorities is described in the Procedures on Pages 5 to 7. The inspection units appeared to be broken down appropriately.

8 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The ICC met 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):
879.75

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 9.65 = 2122.08

Ratio: A / B
879.75 / 2122.08 = 0.41

If Ratio \geq 0.38 Then Points = 5, If Ratio $<$ 0.38 Then Points = 0
Points = 5

Evaluator Notes:

The ICC exceeded the minimum ratio with a ration of 0.41.

- 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 <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Completion of Required DIMP*/IMP Training before conducting inspection as lead? *Effective Evaluation CY2013 | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Root Cause Training by at least one inspector/program manager | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. | Note any outside training completed | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e. | Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector. | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

Since PL3257 is no longer required, the Program Manager has completed all of the core courses. Root cause training has been met since more than one has completed. All ICC analysts (inspectors) have completed the required core courses or are on track to complete within the required timeframe. Upon a review of randomly selected inspection reports completed during 2018, no inspections were led by an analyst that did not have qualifying 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:

The Program Manager is knowledgeable of regulations. He has completed the required core courses at PHMSA's Training and Qualifications. No issues were noted with knowledge of regulations and state's participation in PHMSA's pipeline safety program.

- 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 ICC responded in 59 days. All deficiencies were addressed in the response except for the inspection of the US Steel Granite City Works pipeline. The letter noted it was in progress to resolve the US Steel Pipeline Issue. A follow up discussion was held during the program evaluation site visit. The US Steel Pipeline is still unresolved at the time of the evaluation visit but there is activity still ongoing.

- 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:

Seminars were conducted in 2014 and 2017. The next one is scheduled for 2020.

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| 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 | 0 |
|---|--|---|---|

Evaluator Notes:

Needs improvement. The ICC's procedure state that Standard Inspections are completed on a three year frequency. Upon a review of the Progress Reports for Calendar Years 2016, 2017 and 2018 (3 year period), not all inspection units were inspected. The following inspection unit types were noted:

Inspection Unit Type	Number of Units	Number Units Inspected in 3 Year Period
Private Dist.	70	22
Master Meter	7	4
LPG	3	0
Gas Transmission	61	37
LNG	1	0

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

Upon a review of randomly selected inspections conducted in 2018, inspection forms were reviewed. There were no code requirements found to be missing on the forms. The results of inspections were documented appropriately.

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

The ICC covers this requirement on Page 3 of Inspection Form ILPS3 - Standard Inspection of Distribution Operator - Records Review. Upon a review of randomly selected inspection files completed during 2018, this requirement was reviewed and the results were documented.

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

The ICC covers this requirement on Page 5 of Inspection Form ILPS7 - Standard Inspection of Distribution Operator - O&M Review. Upon a review of randomly selected inspection files completed during 2018, this requirement was reviewed and the results were documented.

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| 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 ICC covers this requirement on Page 7 of Inspection Form ILPS7 - Standard Inspection of Distribution Operator - Records Review. Upon a review of randomly selected inspection files completed during 2018, this requirement was reviewed and the results were documented.

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| 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 ICC covers this requirement on Page 3 of Inspection Form ILPS3 - Standard Inspection of Distribution Operator - Records Review. Upon a review of randomly selected inspection files completed during 2018, this requirement was reviewed and the results were documented.

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| 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:

The ICC assigns an inspection report number for each review of an operator's annual report. These reviews were conducted in March and April 2018 timeframe. The reviews were well documented. The ICC does check for abnormal data and trends.

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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 |
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Evaluator Notes:

The ICC covers this requirement on Page 2 of Inspection Form ILPS6 - Standard Inspection of Gas Transmission Operator - Records Review. Upon a review of randomly selected inspection files completed during 2018, this requirement was reviewed and the results 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 |
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Evaluator Notes:

Two Drug and Alcohol Inspections were conducted during 2018 with 98 conducted over the three previous years. The number of inspections has significantly trended downward over the past three years. The ICC should place a higher priority in scheduling these inspections.

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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:

Twenty three operator qualification inspections were conducted in 2018 which brought the three year total to twenty five. The ICC is behind on its inspection frequency for Operator Qualification inspections. The ICC should place a higher priority for scheduling these inspections to meet the five year interval.

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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 ICC spent 14 inspection person days during 2018, an increase from CY2017, but the ICC will need a significant increase during 2019 to achieve inspection frequency for IMP inspections.

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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 |
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Evaluator Notes:

The ICC spent 29.5 inspection person days during 2018, an increase from CY2017, but the ICC will need a significant increase during 2019 to achieve inspection frequency for DIMP inspections.

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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 |
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Evaluator Notes:

The ICC conducted 48 Public Awareness Inspections, approximately 40% of the operator's plans, during 2018.

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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 |
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Evaluator Notes:

The ICC's web site has a section for pipeline safety that contains information for stakeholders. Inspection and enforcement documents, and other relevant pipeline safety information are posted. The URG organization meets quarterly and the Program Manager addresses the members usually twice a year.

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| 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:

The Pipeline Data Mart did not have any SRC Reports for an intrastate operator in IL during 2018. The ICC closed out report 2017-0165 (reported during 2017) in 2018.

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| 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 ICC covers this requirement on Inspection Form ILPS3 - Standard Inspection of Distribution Operator - Records Review. Upon a review of randomly selected inspection files completed during 2018, this requirement was reviewed and the results were documented.

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|----|--|---|---|
| 22 | Did the state participate in/respond to surveys or information requests from NAPSIR or PHMSA?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----|--|---|---|

Evaluator Notes:

No instances were discovered where the ICC did not participate.

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|----|--|---|---|
| 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 |
|----|--|---|---|

Evaluator Notes:

PHMSA's web site lists six special permits(waivers) issued by the ICC. All six waivers are still valid. The ICC monitors any conditions of a waiver through questions added to its inspection forms. Specifically, ILPS 3 and ILPS4 inspection forms cover these conditions.

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- 24** Did the state attend the NAPS National Meeting in CY being evaluated? 1 1
No = 0 Needs Improvement = .5 Yes = 1

Evaluator Notes:

Yes. The Program Manager attended the National Meeting held in Santa Fe, NM.

- 25** 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:

Damages per 1000 tickets continue to trend downward since 2010. CY2018 damages per 1000 tickets was approximately 2.2. Inspection days per 1000 miles starting to climb due to hiring of new inspection staff. There was a slight drop in CY2018. Inspector Qualifications - Core Training on the rise to due accelerated training of new employees. Leak Repairs per 1000 miles continue to trend upward since 2012 which indicates a higher focus on completing repairs since the number of outstanding leaks is trending downward. Enforcement Programs and Incident Investigations continuing at 100% for each.

- 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:

The ICC's SICT information was considered to be reasonable for CY2019. The ICC was requested to confirm Construction and Control Room Inspection projections. The ICC submittal showed 996 inspection person days for CY2019.

- 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 flow reversals reported to the ICC during CY2018.

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

Evaluator Notes:

Question C.6 - Needs improvement. The ICC's procedure state that Standard Inspections are completed on a three year frequency. Upon a review of the Progress Reports for Calendar Years 2016, 2017 and 2018 (3 year period), not all inspection units were inspected. The following inspection unit types were noted:

Inspection Unit Type	Number of Units	Number Units Inspected in 3 Year Period
Private Dist.	70	22
Master Meter	7	4
LPG	3	0
Gas Transmission	61	37
LNG	1	0

Total points scored for this section: 42
Total possible points for this section: 47

PART D - Compliance Activities

Points(MAX) Score

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|----------|--|---|---|
| 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 ICC has steps identified in its Standard Operating Procedures on Page 25 for providing written non-compliance notification to a company officer. Section V on Page 27 covers tracking of violations. Section W on Page 28 provides steps for the closing of outstanding PV's and NOA's.

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

The ICC completes an exit interview form for each inspection. The operator's representative signs the form. Upon a review of randomly selected inspection reports completed in 2018, there were instances discovered where the ICC did not follow its procedures. Documentation of inspection results was comprehensive.

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|----------|--|---|---|
| 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 2018, all documented probable violations were communicated to the operator in written correspondence.

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

The non-compliance notifications outline procedures for challenging where a penalty or corrective action has been issued.

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

The Program Manager is very knowledgeable with the civil penalty determination process. Repeat violations is one of the considerations for issuing a civil penalty. The ICC has demonstrated its ability to make civil penalty determinations.

- 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:

Yes, the ICC issued three enforcement proceedings seeking civil penalties in CY2018; however, the final order in the dockets did not occur in 2018. The ICC has utilized its fining authority in previous years as noted in the CY2017 evaluation.

- 7 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

The ICC met 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:

The ICC's procedures for Incident Investigations are included in Section VI (Investigation of Incidents) pages 29-35.

- 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 ICC has a 24 Hrs. Incident Notification number which is monitored by inspection staff monitor during regular working hours. An outside contracted answering service is utilized during after hours, holidays and weekends. The answering service notifies the Program Manager or alternate within one hour of receiving call. The ICC is familiar with the NTSB/PHMSA MOU and is aware of the Federal/State cooperation guidelines.

- 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:

The ICC retrieved the initial facts of the two CY2018 incidents by telephonic means. The ICC decided that an on-site investigation was not warranted upon reviewing the cause of third party excavation which is allowed within its procedures. The ICC's Damage Prevention staff is investigating the Wauconda, IL incident. The investigation is still in progress. The City of Chicago has authority for Damage Prevention Law enforcement for the incident that occurred 2037 N. Milwaukee Ave. in Chicago.

- 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:

No issues were found since the Chicago incident was caused by a third party excavator that was excavating outside of the area requested by the dig ticket. The incident in Wauconda, IL is still in progress to determine if operator actions or lack of actions contributed to the incident cause.

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

Evaluator Notes:

None will be issued under the pipeline safety regulations for the Chicago incident. The other incident investigation is still in progress.

- 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:

In an email dated September 5, 2019, the Accident Investigation Division stated is had no issues with the ICC that required improvement.

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

Evaluator Notes:

The ICC provides a summary of incidents and lessons learned during NAPSRR Regional and state seminars.

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

Evaluator Notes:

the ICC met the requirements of Part E of this evaluation.

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



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:

The requirement is covered on Inspection Form ILPS7 on Page 6.

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

The requirement is covered on ILPS3 on Page 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:

The ICC covers this issue on inspection form ILPS3 on Page 4.

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

This issue is covered with operator on Inspection Form ILPS3 Page 3. The ICC reviews individual operator information as part of the review of an operator's annual report.

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

Evaluator Notes:

The ICC met 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 Corporation

Name of State Inspector(s) Observed:

Byan Pemble

Location of Inspection:

East Moline, Sylvis and Rock Island, IL

Date of Inspection:

September 24 -26, 2019

Name of PHMSA Representative:

Don Martin

Evaluator Notes:

The ICC conducted a construction inspection of the operator's low pressure system replacement project in Silvis, IL on September 24th. The ICC reviewed the installation, testing and purging of three new service lines. On September 25th, the ICC inspected the testing of pressure regulators, overpressure control and odorant levels of systems in East Moline, IL. On September 26th, the ICC observed cathodic protection test readings in Rock Island, IL.

- 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, the operator had representatives present during the inspections.

- 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 utilized the ICC's forms for construction and standard inspections.

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

Evaluator Notes:

Yes, all applicable form questions were addressed and results were noted.

- 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:

Yes, the inspector reviewed all equipment needed for the installation of plastic service lines such as fusion heating irons, pyrometers, gauges, etc. Calibration dates were verified. Equipment for pressure regulation, over pressure control cathodic protection testing were reviewed.

- 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:

Yes, the covered all procedures and field activities for plastic service line installation, pressure regulation, over pressure control and cathodic protection. Operator qualifications were reviewed for operator personnel performing plastic service line installation and field activities.

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:
No deficiencies in knowledge was observed.

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. A form documenting the exit interview was signed by the operator's representative.

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:
Yes, three probable violations were communicated to the operator during the exit interview.

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

- | | | |
|----|-----------------------------|-------------------------------------|
| A. | Repairs | <input type="checkbox"/> |
| B. | Signs | <input checked="" type="checkbox"/> |
| C. | Tapping | <input checked="" type="checkbox"/> |
| D. | Valve Maintenance | <input checked="" type="checkbox"/> |
| E. | Vault Maintenance | <input type="checkbox"/> |
| F. | Welding | <input type="checkbox"/> |
| G. | OQ - Operator Qualification | <input checked="" type="checkbox"/> |
| H. | Compliance Follow-up | <input type="checkbox"/> |
| I. | Atmospheric Corrosion | <input checked="" type="checkbox"/> |
| J. | Other | <input type="checkbox"/> |

Evaluator Notes:

No deficiencies were observed that resulted in a loss of points during the inspections.

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



PART H - Interstate Agent State (If Applicable)**Points(MAX) Score**

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

Evaluator Notes:

The ICC is not an interstate agent.

- | | | | |
|----------|---|---|----|
| 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 ICC is not an interstate agent.

- | | | | |
|----------|--|---|----|
| 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 ICC is not an interstate agent.

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|----------|---|---|----|
| 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 ICC is not an interstate agent.

- | | | | |
|----------|---|---|----|
| 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 ICC is not an interstate agent.

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|----------|--|---|----|
| 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 ICC is not an interstate agent.

- | | | | |
|----------|---|---|----|
| 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 ICC is not an interstate agent.

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|----------|--|--|--------------------|
| 8 | General Comments:
Info Only = No Points | | Info OnlyInfo Only |
|----------|--|--|--------------------|

Evaluator Notes:

The ICC 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)**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 ICC does not have a 60106 agreement.

- | | | | |
|----------|--|---|----|
| 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 ICC does not have a 60106 agreement.

- | | | | |
|----------|--|---|----|
| 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 ICC does not have a 60106 agreement.

- | | | | |
|----------|---|---|----|
| 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 ICC does not have a 60106 agreement.

- | | | | |
|----------|--|---|----|
| 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 ICC does not have a 60106 agreement.

- | | | | |
|----------|--|---|----|
| 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 ICC does not have a 60106 agreement.

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

Evaluator Notes:

The ICC does not have a 60106 agreement.

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