



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

1200 New Jersey Avenue SE
Washington DC 20590

2021 Gas State Program Evaluation

for

GEORGIA PUBLIC SERVICE COMMISSION

Document Legend

PART:

- O -- Representative, Dates and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- State Qualifications
- D -- Program Performance
- E -- Field Inspections
- F -- Damage prevention and Annual report analysis
- G -- Interstate Agent/Agreement States



2021 Gas State Program Evaluation -- CY 2021

Gas

State Agency: Georgia

Agency Status:

Date of Visit: 05/17/2021 - 05/19/2021

Agency Representative: Michelle Thebert, Jeff Baggett

PHMSA Representative: Joe Subsits, Glynn Blanton (Field)

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

Name/Title: Tricia Pridemore, Chairman

Agency: Georgia Public Service Commission

Address: 244 Washington St, SW

City/State/Zip: Atlanta, Georgia 30334

Rating:

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

INSTRUCTIONS:

Complete this evaluation in accordance with the Evaluator Guidance for conducting state pipeline safety program evaluations. The evaluation should generally reflect state program performance during CY 2021 (not the status of performance at the time of the evaluation). 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 appropriate notes/comments section. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and they OBJECTIVELY reflect the state's program performance for the question being evaluated. Increasing emphasis is being placed on how the state pipeline safety programs conduct and execute their pipeline safety responsibilities (their 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

A	Progress Report and Program Documentation Review
B	Program Inspection Procedures
C	State Qualifications
D	Program Performance
E	Field Inspections
F	Damage prevention and Annual report analysis
G	Interstate Agent/Agreement States

Possible Points Points Scored

0	0
15	15
10	10
50	47
15	15
10	10
0	0
100	97

TOTALS

State Rating **97.0**

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- 1 Were the following Progress Report Items accurate? (*items not scored on progress report) Info Only Info Only
Info Only = No Points
- Stats On Operators Data - Progress Report Attachment 1
 - State Inspection Activity Data - Progress Report Attachment 2
 - List of Operators Data - Progress Report Attachment 3*
 - Incidents/Accidents Data - Progress Report Attachment 4*
 - Stats of Compliance Actions Data - Progress Report Attachment 5*
 - List of Records Kept Data - Progress Report Attachment 6 *
 - Staff and TQ Training Data - Progress Report Attachment 7
 - Compliance with Federal Regulations Data - Progress Report Attachment 8
 - Performance and Damage Prevention Question Data - Progress Report Attachment 10*

Evaluator Notes:

- Georgia has 2 private systems with 127 units, 80 municipal operators with 142 units, 107 master meters with 121 units, 7 LPG systems and units, 14 intrastate transmission with 106 units and 1 LNG facility with 3 units. The progress report information was taken from the system data base which was developed internally. Operators are counted manually. The unit count for private and municipal operators has been corrected in these notes to align with attachment 3 which is correct.
- Georgia had 889 total inspection days with 159 Construction days. This calculates to 18% construction days. Construction days are below the 20% criteria. An activity report is used to calculate inspection days. There is currently draft rule to get crew sheets submitted on a weekly basis.
- Attachment 3 lists 127 distribution units, Attachment 1 lists 126, Attachment 3 has 142 municipal units while attachment 1 lists 144. Random operator's were checked and found in attachment 3.
- Four incident reports were listed in the progress report. The Four incidents were reported to NRC and are listed in Pipeline Data Mart. 30-day reports and follow up reports were submitted for all incidents.
- The correct amount of compliance actions were carried over from 2020 report. Compliance dates were retrieved from the date base.
- Electronic records were readily retrievable in the data base.
- Supervisor times add up to 100%. Inspector qualifications in the progress report were consistent with T&Q records.
- All amendments have been adopted in a timely manner. Georgia has automatic adoption.
- The Inspection workplan was completed. Automatic adoption of Federal amendments was implemented.

Issues with Progress Report:

Unit counts for private and municipal units is inconsistent. Attachment 3 is correct.

Georgia had 18% construction days which is less than the required 20% day criteria

SICT days were not met. GA had 889 days. They were required to have 997 days through SICT.

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

- | | | | |
|---|---|---|---|
| 1 | Do written procedures address pre-inspection, inspection and post inspection activities for each of the following inspection types: Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none"> a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspections b. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually) c. OQ Inspections d. Damage Prevention Inspections e. On-Site Operator Training f. Construction Inspections (annual efforts) g. LNG Inspections | | |

Evaluator Notes:

Inspection procedures are addressed in section IV of Georgia's internal procedures. Preinspection Section IV Procedures for conducting inspections are found in section IV(3). PHMSA forms are supplemented by a Georgia state form. Georgia has a work book which is used to guide the inspector through the inspection process and to help ensure that the inspectors follows required processes. The Work book attachment addresses form use instructions and exit interview documentation. This is found in section V(1) of the procedure. Instructions for processing reports are found in section VI. Risk based frequencies are addressed in Section III. Reference is made to PHMSA site to get access federal forms.

- a. Standard inspections are addressed in section IV (2)(a).
- b. TIMP and DIMP inspections are covered in sections IV(2)(d)(3-5).
- c. Operator Qualifications are covered under section IV(2)(d)(6).
- d. Damage Prevention activities are covered under Section IV(2)(d)(8).
- e. On-site operator training is covered under Section IV(2)(d)(2).
- f. Construction inspections are covered under Section IV(2)(d)(1).
- g. LNG inspections are covered under Section IV(b). Inspection are required within 3 years

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|---|--|---|---|
| 2 | Do written procedures address inspection priorities of each operator, and if necessary each unit, based on the following elements and time frames established in its procedures? Chapter 5.1
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| | <ul style="list-style-type: none"> a. Length of time since last inspection 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 operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, 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:

Section III addresses inspection priorities. Operators may be subject to higher inspection frequency based on criteria specified in Section III(2)(f).
a-f. Prioritization of inspection schedules takes the following into consideration: Time since last inspection, history of inspection unit, Leak history, compliance status, accident, incident and failure history, annual report information and activities performed by operator. Inspection frequency determination is addressed in Section IV (1).

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|---|---|---|---|
| 3 | (Compliance Procedures) 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 = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
| | <ul style="list-style-type: none"> a. Procedures to notify an operator (company officer) when a noncompliance is identified b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns c. Procedures regarding closing outstanding probable violations | | |

Evaluator Notes:

Compliance procedures are found in section V.

a. Section V requires an exit interview within 30 days. Written comment meeting the 90 day requirement is listed in section V Procedures for notifying the company official when non compliance is found is in Section V, under "Procedures for Notifying an Operator When Non-compliance is Identified."

b. Section V b 3 identifies how compliance follow up is to be handled.

c. Section VI addresses Inspection report status for violations and follow up.

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| 4 | (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident?
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
| | a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports | | |
| | b. If onsite investigation was not made, do procedures require on-call staff to obtain sufficient information to determine the facts to support the decision not to go on-site. | | |

Evaluator Notes:

Incident response procedures are found in Section VIII.

a. Procedure VIII address the receipt of accident notifications. The Investigator is required to fill out PHMSA form 11.

b. Section addresses documentation if the operator does not go on-site in section VIII

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

Evaluator Notes:

No issues found in part B.

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



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| 1 | Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.3
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|----------|--|---|---|
- a. Completion of Required OQ Training before conducting inspection as lead
 - b. Completion of Required DIMP/IMP Training before conducting inspection as lead
 - c. Completion of Required LNG Training before conducting inspection as lead
 - d. Root Cause Training by at least one inspector/program manager
 - e. Note any outside training completed
 - f. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1)

Evaluator Notes:

Inspectors and program managers have fulfilled training requirements. Core qualified inspectors are Don Baggett, Jack Hewitt, Daphne Jones, Joe Jones, David Lewis, Ken Rowe, Jason Smith and Michelle Thebert. Failure qualified inspectors are Don Baggett, Jack Hewitt, Daphne Jones, Joe Jones, David Lewis, Ken Rowe, Jason Smith, Jerry Towe and Michelle Thebert. Michelle is not listed as an inspector in the progress report. Willie Culbreath, Ben Stair and Brant Sweat are new and not qualified for any inspections yet.

- a. OQ qualified inspectors are Don Baggett, Jack Hewitt, Daphne Jones, Joe Jones, David Lewis, Ken Rowe, Jason Smith, Jerry Towe and Michelle Thebert.
- b. Gas IMP qualified inspectors were Jeff Baggett, Daphne Jones, David Lewis, Jason Smith and Jerry Towe. DIMP qualified inspectors are Jeff Baggett, Daphne Jones, Joe Jones, David Lewis, Jason Smith and Jerry Towe.
- c. LNG qualified personnel are Jeff Baggett, Jack Hewitt, Daphne Jones, Joe Jones, David Lewis, Jason Smith, Jerry Towe and Michelle Thebert.
- d. Root Cause trained personnel are Jeff Baggett, Jack Hewitt, Ken Rowe, Jason Smith and Jerry Towe.
- e. Outside training is provided. The State sent inspectors to the Appalachian Corrosion control school in 2022.
- f. Inspectors were qualified to lead the inspections they lead. This conclusion was based on the 2021 random operator inspection review.

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| 2 | Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations?
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
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Evaluator Notes:

Michelle is core and failure qualified. Michelle been program manager since 2013. Prior to working as program manager, she worked with the commission rates program.

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| 3 | General Comments:
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

No issues found in Section C

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

PART D - Program Performance

Points(MAX) Score

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|---|---|---|---|
| 1 | 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 | 2 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. Construction (did state achieve 20% of total inspection person-days?)g. OQ (see Question 3 for additional requirements)h. IMP/DIMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Inspection intervals were evaluated for 2022 random operators as selected on the random operator list. Base on this review, the following five year inspection frequencies were exceeded.

- a. Standard inspection for Southern Gas company 2/12/2017 most recent, 7/30/2008 previous.
- b. PA for Warner Robins Gas system was last inspected on 6/5/2015. The following previous PA inspection frequencies exceeded the five year interval. City of Cairo 6/25/2019, most recent 6/19/2013 previous. City of Winder 6/19/2019 most recent, 8/7/2013 previous, City of LaGrange 2/11/2019 most recent, 5/14/2013 previous. City of Austell 6/5/2019 most recent, 7/8/2013 previous. City of Millen 2/23/2021 most recent, 4/8/2013 previous. City of Tifton 3/2/2020 most recent, 8/12/2013 previous. Southern Gas Company 5/11/2021, 6/3/2013 previous.
- c. The following previous inspection date was missed for a Drug and Alcohol inspection: Southern Gas Company 5/24/2018 most recent, 3/21/2011 previous.
- d. Control Room management inspections were conducted within appropriate time intervals.
- e. LNG operator was not evaluated at the time of the inspection since they were not on the random operator list.
- f. GA had 889 total inspection days with 159 Construction days. This calculates to 18% construction days. The state did not meet the required 20% threshold.
- g. The following previous inspection dates for Operator Qualification inspections did not meet the five year criteria: City of Camilla 6/22/2021 most recent, 9/30/2015 previous. City of Winder 8/24/2021 most recent, 9/2/2015 previous. City of LaGrange 1/20/2021 most recent, 6/2/2025 previous. Southern Gas company 11/9/2021 most recent, 11/15/2014.
- h. The DIMP previous inspection date exceeded the 5 year limit. Town of Shellmon 1/22/2020 most recent, 5/14/2014 previous.

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|---|---|----|----|
| 2 | 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. Do inspection records indicate that adequate reviews of procedures, records and field activities, including notes and the appropriate level of inspection person-days for each inspection, were performed?
Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. Constructiong. OQ (see Question 3 for additional requirements)h. IMP/DIMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Random operator that had inspections conducted in 2021 were reviewed. Federal forms were used with supplemental state checklist for the standard inspection. Forms were filled out completely and appropriately.

- a. Standard inspection was appropriate and filled out appropriately.
- b. Public awareness inspection forms appropriate and filled out appropriately.
- c. Drug Alcohol inspection forms were appropriate and filled out correctly.
- d. Control room management forms were appropriate and filled out correctly.
- e. No LNG operators were listed on the random operator list.

- f. The appropriate Construction inspection form was used.
- g. Operator Qualification forms were appropriate and filled out correctly.
- h. DIMP inspection forms were appropriate and filled out correctly.

3	Is state verifying monitoring (Protocol 9/Form15) of operators OQ programs? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals established in the operator's plan. 49 CFR 192 Part N Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

OQ inspections are performed at five year intervals. Protocol 9 is done for all standard inspections. Qualified personnel performed OQ inspections. Forms were filled out completely.

4	Is state verifying operator's integrity management Programs (IMP and DIMP)? This should include a review of plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operator's plan(s). 49 CFR 192 Subparts O and P Yes = 2 No = 0 Needs Improvement = 1 <ul style="list-style-type: none"> a. Are the implementation plans of the state's large/largest operators(s) being reviewed annually to ensure they are completing full cycle of the IMP process? b. Are states verifying with operators any plastic pipe and components that have shown a record of defects/leaks and mitigating those through DIMP plan? c. Are the states verifying operators are including low pressure distribution systems in their threat analysis? 	2	2
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Evaluator Notes:

IMP and DIMP inspections were performed including an annual review of the largest operators.

- a. Atlanta Gas is the largest IMP and TIMP operator. They are reviewed annually. A report is written as a result of the review.
 - b. This issue is addressed on the state supplemental inspection form.
 - c. This question is also on the state supplemental form. There are no low pressure distribution systems in the State.
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5	Did the state review the following (these items are NTSB recommendations to PHMSA that have been deemed acceptable response based on PHMSA reviewing these items during the evaluation process): Chapter 5.1 Yes = 2 No = 0 Needs Improvement = 1 <ul style="list-style-type: none"> a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken; b. 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); c. 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; d. 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; e. 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; f. Operator procedures for considering low pressure distribution systems in threat analysis? g. Operator compliance with state and federal regulations for regulators located inside buildings? 	2	2
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Evaluator Notes:

- a. Recommendations is addressed in the State and Public Service Commission rules inspection form. This supplemental form is filled out for all standard inspections.
- b. Recommendations is addressed in the State and Public Service Commission rules inspection form. This supplemental

form is filled out for all standard inspections.

c. Recommendations is addressed in the State and Public Service Commission rules inspection form. This supplemental form is filled out for all standard inspections.

d. Recommendations is addressed in the State and Public Service Commission rules inspection form. This supplemental form is filled out for all standard inspections.

e. Recommendations is addressed in the State and Public Service Commission rules inspection form. This supplemental form is filled out for all standard inspections.

f. Recommendations is addressed in the State and Public Service Commission rules inspection form. This supplemental form is filled out for all standard inspections.

g. Recommendations is addressed in the State and Public Service Commission rules inspection form. This supplemental form is filled out for all standard inspections.

6	Did the State verify Operators took appropriate action regarding advisory bulletins issued since the last evaluation? (Advisory Bulletins Current Year) Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

This question is addressed on the state's supplemental checklist.

7	(Compliance Activities) 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 = 10 No = 0 Needs Improvement = 1-9 a. Were compliance actions sent to company officer or manager/board member if municipal/government system? b. Were probable violations documented properly? c. Resolve probable violations d. Routinely review progress of probable violations e. Did state issue compliance actions for all probable violations discovered? f. Can state demonstrate fining authority for pipeline safety violations? g. Does Program Manager review, approve and monitor all compliance actions? (note: Program Manager or Senior Official should sign any NOPV or related enforcement action) h. Did state compliance actions give reasonable due process to all parties? Including "show cause" hearing, if necessary. i. Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns j. Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. (Incident investigations do not need to meet 30/90-day requirement)	10	10
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Evaluator Notes:

Inspection reports were reviewed for operators on the random operator list.

a. Inspection and compliance letters were sent to the chief company official. In most instances, letters were sent to the Mayor.

b. Non compliance issues were documented in the inspection checklist.

c. Some probable violation were closed. Others are still open.

d. Outstanding violations remain open in the data base. They are expected to be addressed during standard inspections.

e. All violation identified in the inspection checklist were identified in compliance letters.

f. \$805,000 in penalties were assessed last year in accordance with Georgia's progress report.

g. All compliance letters are signed and reviewed by the program manager.

h. Operators have the option the opportunity for a hearing.

i. Exit interviews are conducted within 30 days. The exit interviews are usually performed on the last day of the inspection.

j. Written findings letter are submitted within 90 days.

8	(Incident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations?	10	10
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Yes = 10 No = 0 Needs Improvement = 1-9

- a. Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports?
- b. Did state keep adequate records of Incident/Accident notifications received?
- c. If onsite investigation was not made, did the state obtain sufficient information from the operator and/or by means to determine the facts to support the decision not to go on site?
- d. Were onsite observations documented?
- e. Were contributing factors documented?
- f. Were recommendations to prevent recurrences, where appropriate, documented?
- g. Did state initiate compliance action for any violations found during any incident/accident investigation?
- h. Did 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?
- i. Does state share any lessons learned from incidents/accidents?

Evaluator Notes:

Last year there were four federally reportable incidents. Two incidents were on main and two were on services. One incident was caused by excavation damage, one incident was caused by natural forces and two incidents were caused by outside forces. All four incidents were reported by Atlanta Gas Light. On 10/6/21, a lightning incident occurred, On 8/5/21, a fire / explosion event was the primary cause. on 7/21/21, a Third Party damage incident occurred, On 3/2/21, an Outside force incident occurred.

- a. Operators are given pipeline staff phone numbers and are responsible for contacting an inspector in the event of an off duty incident. Records are maintained in form 11.
- b. Records were reviewed and adequate.
- c. Not applicable, On-site investigations were made for all incidents.
- d. Observations were documented
- e. Contributing factors were documented
- f. Recommendations were made.
- g. One NOPV was identified and listed in the report and letter. The issue which is currently open had do with questionable response times for the incident.
- h. There were no requests for assistance from AID. Jeff works with AID as a liaison for incidents.
- i. Lessons learned from incidents are shared at the Southern Region NAPSIR meeting.

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| 9 | 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 | 1 | 1 |
|----------|--|---|---|
- Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Letter to Tricia Pridemore was sent on 12/7/21. Response to the letter was submitted on 2/8/2021. Tricia is still the Commission chair. Last year there was a three point deduction for not inspecting all types of operators and inspection units at intervals established by procedures. The GA chair stated she will strive to get the staff to complete commitments. This was a repeat issue in this years evaluation.

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|-----------|--|-----------|-----------|
| 10 | Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5 | Info Only | Info Only |
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- Info Only = No Points

Evaluator Notes:

The last seminar was performed on April 2022. A virtual seminar was in 2021. Seminars are done annually.

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| 11 | Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission? | Info Only | Info Only |
|-----------|---|-----------|-----------|
- Info Only = No Points

Evaluator Notes:

Georgia use the PHMSA form supplemented with a state form. This question is addressed on the supplemental state form.

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

Evaluator Notes:

The Web page lists contact information, PHMSA metrics, Best practices and Georgia 811 information. Georgia also conducts annual safety seminars.

- 13** Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.7 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

2 safety related conditions were noted for 2021. These conditions were a dent with metal loss and an MAOP exceedance. Both safety related conditions were from Atlanta Gas Light (ACL). Reports were written for both safety related conditions. One report, (the MAOP exceedance) resulted in a warning letter. A response to reconfigure the relief stations was AGL's remedial action.

- 14** Was the State responsive to: 1 1
Yes = 1 No = 0 Needs Improvement = .5
a. Surveys or information requests from NAPSRS or PHMSA; and
b. PHMSA Work Management system tasks?

Evaluator Notes:

a. Georgia responds to NAPSRS surveys.
b. Two 2021 WMS entries were still open. Both from Atlanta Gas and Light. 7/7/21 was an SRC event which was caused by an immediate anomaly. On 7/7. 10/6 was a house fire in Gainesville GA still under investigation. Georgia respond to WMS when there is a notification.

- 15** If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate. 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

In 2017 there was a waiver for emergency OQ activities for Hurricane Irma. This waiver expired in 30 days.

- 16** Were pipeline program files well-organized and accessible? Info Only Info Only
Info Only = No Points

Evaluator Notes:

Electronic files appeared organized. The data base was developed internally. Information was readily accessible.

- 17** Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT). Has the state updated SICT data? 3 3
Yes = 3 No = 0 Needs Improvement = 1-2

Evaluator Notes:

Comments on SICT from the Grant Allocation committee noted that more detailed risk ranking and risk consideration information was needed. Michelle stated that she will do this.

- 18** Discussion on State Program Performance Metrics found on Stakeholder Communication Info Only Info Only
site.\ <http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805>
Info Only = No Points

Evaluator Notes:

Damages per 1000 locates appear to be trending down to about 2.9 damages per 1000 locates. MM/LPG days/ unit were trending downward. The Gas enforcement score is maxed out after a downward trend from 2015 to 2017. The Incident investigation score was peaked out at after a 2017 to 2018 dip. For qualification metrics, core training % is trending down, additional training is has taken a jump after a 4 year downward trend. % 5 year retention took a slight jump up after 5 year downward trend. Leaks eliminated per thousand miles are trending down, Hazardous leak eliminated per 1000 miles is trending slightly downward.

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- 19** Did the state encourage and promote operator implementation of Pipeline Safety Management Systems (PSMS), or API RP 1173? This holistic approach to improving pipeline safety includes the identification, prevention and remediation of safety hazards. Info Only Info Only
Info Only = No Points
- a. <https://pipelinesms.org/>
 - b. Reference AGA recommendation to members May 20, 2019

Evaluator Notes:

There is a SMS question in the state supplemental checklist. This has also been a topic at the pipeline safety seminar.

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

Evaluator Notes:

There were three issue that resulted in point deductions:

- a. % construction days were not met
- b. 5 year inspection interval was not met for several inspections.

Total points scored for this section: 47
Total possible points for this section: 50



PART E - Field Inspections

Points(MAX) Score

- 1 Operator, Inspector, Location, Date and PHMSA Representative (enter specifics into the comments box below) Info Only Info Only

Info Only = No Points

- What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc)
- When was the unit inspected last?
- Was pipeline operator or representative present during inspection?
- Effort should be made to observe newest state inspector with least experience

Evaluator Notes:

- Standard Comprehensive Inspection of records. The inspection was performed in Dalton, Georgia at the Dalton Utilities office located at 1200 V.D. Parrott, Jr. Parkway on May 9-13, 2022.
- Last inspection was performed on September 25, 2017 and letter to operator pertaining to the inspection was provided on February 1, 2018.
- The following Dalton Utilities personnel were presented during the inspection: Ralph Smith, Energy Management, Ronnie Wilkerson, Erik Rittenhouse, Phillip Pfeifer & Eric Atkins. The following individual from SRCS consultants was presented: Maurice Chaney. Additional Georgia Public Service Commission representatives were presented: Jeff Baggett & Daniel Clemmons.
- The inspector being observed was Jason Smith. Mr. Smith has not been observed previously and is the newest state inspector at the time of this inspection schedule was established. Mr. Smith has completed all required training courses at T&Q and is an active gas inspector.

- 2 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, Mr. Smith was using the GPSC standard comprehensive form. He was asking the operator representatives questions about each inspection item listed in the form. He was recording their responses into his laptop computer software program.

- 3 Did the inspector adequately review the following during the inspection 10 10

Yes = 10 No = 0 Needs Improvement = 1-9

- Procedures (were the inspector's questions of the operator adequate to determine compliance?)
- Records (did the inspector adequately review trends and ask in-depth questions?)
- Field Activities/Facilities (did inspector ensure that procedures were being followed, including ensuring that properly calibrated equipment was used and OQ's were acceptable?)
- Other (please comment)
- Was the inspection of adequate length to properly perform the inspection?

Evaluator Notes:

- Yes, observed Mr. Smith asking and requesting records for qualified plastic fusion personnel. Comparison of their qualifications to operator's records and work orders were reviewed.
- Yes, Mr. Smith reviewed Dalton Utilities records and compared information from previous documents pertaining to trend. He asked a lot of in-depth questions to the operator representatives.
- Mr. Smith was thorough in his review of the operator's operation and maintenance manual to the actual records provided to him to verify compliance with the pipeline safety regulations.
- The length of the inspection was adequate based on the type of inspection being performed.

- 4 From your observation did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, Mr. Smith has been with the GPSC for twelve years. He was previously with the Georgia Utilities Facilities Protection Division before transferring to the Pipeline Safety Division. Mr. Smith has completed all courses at T&Q and is classified as a State Qualified Active Gas Inspector.

-
- | | | | |
|---|---|---|---|
| 5 | Did the inspector conduct an exit interview, including identifying probable violations? (If inspection is not totally completed the interview should be based on areas covered during time of field evaluation) | 1 | 1 |
|---|---|---|---|
- Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The inspection was not fully completed on Thursday due to additional records and cathodic readings that needed to be taken. A discussion with Mr. Jason Smith, GPSC Inspector, indicated no violations had been found or noted against the operator Dalton Utilities. Mr. Smith planned to conducted the exit interview with Mr. Ralph Smith, Energy Management on Friday, May 13th.

- | | | | |
|---|---|-----------|-----------|
| 6 | Was inspection performed in a safe, positive, and constructive manner ? | Info Only | Info Only |
|---|---|-----------|-----------|
- Info Only = No Points
- a. No unsafe acts should be performed during inspection by the state inspector
 - b. What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)
 - c. Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)
 - d. Other

Evaluator Notes:

Yes, observed all safety practices being followed when field verification of repaired leaks, valves checked for operation and regulator stations being reviewed for corrosion and operation.

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

Evaluator Notes:

No loss of points occurred in this section of the state program evaluation review.

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



PART F - Damage prevention and Annual report analysis**Points(MAX) Score**

- | | | | |
|---|--|---|---|
| 1 | 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:

Jeff Baggett reviews annual reports and inserts them into the GA risk assessment. Inspectors also review past 5 years of annual report data as a workbook requirement which is required to be filled out during the standard inspection. A spreadsheet is generated summarizing this information. This information is trended.

- | | | | |
|---|--|---|---|
| 2 | Has the state verified that the operators analyze excavation damages for the purpose of determining root causes and minimizing the possibility of a recurrence? (192.617)
Has the state verified that the operators have appropriately identified excavators who have repeatedly violated one-call laws and damaged their facilities. Have the operators taken steps to mitigate that risks? (192.1007)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

The State does damage prevention investigations and requires remedial action depending on the results of the investigation. The state also evaluates operator activity during standard inspection. The State penalizes repeat offenders.

- | | | | |
|---|---|---|---|
| 3 | Has the state reviewed the operator's annual report pertaining to Part D - Excavation Damage?
Yes = 4 No = 0 Needs Improvement = 1-3 <ol style="list-style-type: none">a. Is the information complete and accurate with root cause numbers?b. Has the state evaluated the causes for the damages listed under "One-Call Notification Practices Not Sufficient" (Part D.1.a)?c. Has the state evaluated the causes for the damages listed under "Locating Practices Not Sufficient" (Part D.1.b)? For each operator, does the state review the following?d. Is the operator or its locating contractor(s) qualified and following written procedures for locating and marking facilities?e. Is the operator appropriately requalifying locators to address performance deficiencies?f. What is the number of damages resulting from mismarks?g. What is the number of damages resulting from not locating within time requirements (no-shows)?h. Is the operator appropriately addressing discovered mapping errors resulting in excavation damages?i. Are mapping corrections timely and according to written procedures?j. Has the state evaluated the causes for the damages listed under "Excavation Practices Not Sufficient" (Part D.1.c)? | 4 | 4 |
|---|---|---|---|

Evaluator Notes:

Jeff Baggett reviews annual reports including Part D. This information is entered into the risk assessment.

- a. Part D information is entered, trended and put into the risk assessment.
- b. The State requires that "practices not sufficient" be broken into detailed categories in the workbook spreadsheet.
- c. State requires that "practices not sufficient: be broken into detailed categories in workbook spreadsheet.
- d. State requires that practices not sufficient are broken into detailed categories in workbook spreadsheet. Causes are listed and broken down from "no sufficient practices category. Categorized causes are listed in workbook spreadsheet. The State also does independent accident investigations.
- e. State requires that practices not sufficient are broken into detailed categories in workbook spreadsheet. Causes are listed and broken down from "no sufficient practices category. Categorized causes are listed in workbook spreadsheet. The State also does independent accident investigations.
- f. State requires that practices not sufficient are broken into detailed categories in workbook spreadsheet. Causes are listed and broken down from "no sufficient practices category. Categorized causes are listed in workbook spreadsheet. The State also does independent accident investigations.
- g. State requires that practices not sufficient are broken into detailed categories in workbook spreadsheet. Causes are listed and broken down from "no sufficient practices category. Categorized causes are listed in workbook spreadsheet. The State also does independent accident investigations.
- h. State requires that practices not sufficient are broken into detailed categories in workbook spreadsheet. Causes are listed

and broken down from "no sufficient practices category. Categorized causes are listed in workbook spreadsheet. The State also does independent accident investigations.

i. State requires that practices not sufficient are broken into detailed categories in workbook spreadsheet. Causes are listed and broken down from "no sufficient practices category. Categorized causes are listed in workbook spreadsheet. The State also does independent accident investigations.

j. State requires that practices not sufficient are broken into detailed categories in workbook spreadsheet. Causes are listed and broken down from "no sufficient practices category. Categorized causes are listed in workbook spreadsheet. The State also does independent accident investigations.

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

- a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.
- b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages?
- c. Has the state evaluated which of the following best describes the reason for the excavation damages; i.e., operator or contractor not following written procedures, failure to maintain marks, failure to support exposed facilities, failure to use hand tools were required, failure to test-hole (pot hole), improper backfilling practices, failure to maintain clearance or insufficient excavation practices.
- d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?

Evaluator Notes:

Information taken from annual reports and inserted into risk assessment. Damaged per 1000 used to populate risk assessment.

- a. Excavators are responsible for the highest number of damages.
- b. Damage prevention education and training is reviewed during the Public Awareness program review.
- c. Causes are broken down and tallied in workbook spread sheet. The State also has four damage prevention investigators that do damage prevention investigations.
- d. Damage prevention education and training is reviewed during the Public Awareness program review. Causes are broken down and tallied in workbook spread sheet. The State also has four damage prevention investigators that do damage prevention investigations.

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

Evaluator Notes:

No issues noted in Part F.

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

PART G - Interstate Agent/Agreement States

Points(MAX) Score

- 1 Were all inspections of interstate pipelines conducted using the Inspection Assistant program for documenting inspections? Info Only Info Only
Info Only = No Points

Evaluator Notes:

Georgia is not an interstate agent.

- 2 If inspections were conducted independent of a PHMSA team inspection was notice of all identified probable violations provided to PHMSA within 60 days? Info Only Info Only
Info Only = No Points

Evaluator Notes:

Georgia is not an interstate agent.

- 3 If inspections were conducted independent of a PHMSA team inspection was PHMSA immediately notified of conditions which may pose an immediate safety hazard to the public or environment? Info Only Info Only
Info Only = No Points

Evaluator Notes:

Georgia is not an interstate agent.

- 4 If inspections were conducted independent of a PHMSA team inspection did the state coordinate with PHMSA if inspections not were not included in the PHMSA Inspection Work Plan? Info Only Info Only
Info Only = No Points

Evaluator Notes:

Georgia is not an interstate agent.

- 5 Did the state take direction from and cooperate with PHMSA for all incident investigations conducted on interstate pipelines? Info Only Info Only
Info Only = No Points

Evaluator Notes:

Georgia is not an interstate agent.

- 6 General Comments: Info Only Info Only
Info Only = No Points

Evaluator Notes:

Georgia is not an interstate agent.

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