



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

1200 New Jersey Avenue SE
Washington DC 20590

2022 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



2022 Gas State Program Evaluation -- CY 2022

Gas

State Agency: Georgia

Agency Status:

Date of Visit: 05/30/2023 - 06/01/2023

Agency Representative: Michelle Thebert, Jeff Baggot

PHMSA Representative: Joe Subsits

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

Name/Title: Tricia Pridemore, Chairwoman

Agency: Georgia Public Service Commission

Address: 244 Washington Street, SW

City/State/Zip: Atlanta, GA 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 2022 (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

Possible Points Points Scored

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

0	0
15	15
10	10
50	49
15	15
10	10
0	0

TOTALS

100 99

State Rating **99.0**

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 140 units, up from 127 units, units went up because of LDC expansion. There are 78 municipal operators which is down from 80 municipal operators with 140 units down from 142 units, This drop resulted from a merger. There are 55 master meters down from 107 with 140 units down from 121 units, This was because some master meters were absorbed by LDCs, some master meters switched to electric and some master meters buildings were demolished. 4 LPG systems is down from 7 LPG systems and 4 units, 3 LPG operators went out of the LPG business. 14 intrastate transmission systems with 104 units is down from 106 units. This was due to AGL reclassifying their transmission lines. There is 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.
- Georgia had 1008 total inspection days with 147 Construction days. There were 928 required SICT days. This calculates to 16% construction days. Construction days are below the 20% criteria. The point deduction will be waived because of 114 inspection prioritization. Georgia staff spent 269 days working on 114 inspections. An activity report is used to calculate inspection days. There is currently a draft rule to require that crew sheets be submitted on a weekly basis.
- Attachment 3 lists 140 distribution units and 140 municipal units. LPG had 4 units in attachment 1 and 3 in attachment 3. 4 is the correct number. It was suggested that Michelle contact Carrie to determine how to address the error.
- There were no federally reportable incidents in 2022 according to WMS and the progress report. There was an NRC report on 11/16 22 due to an odor call from a private citizen in Thomasville. This source of the odor could not be determined.
- The correct amount of compliance actions were carried over from 2021 progress report. Compliance activities were added correctly. Compliance dates were retrieved from the data base. Penalties of \$805,000 were assessed and \$43,500 in penalties were collected in 2022. 58 of 541 violations were corrected. A Process has been incorporated to address outstanding violations.
- Electronic records were readily retrievable from 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.
- Program accomplishments include the Inspection workplan being completed, automatic adoption was implemented and \$43,000 in penalties were collected.

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 |
|---|---|---|---|
- 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. Pre-inspection 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 follow required processes. The Work book attachment addresses form use instructions and exit interview documentation. This is addressed 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

- | | | | |
|---|--|---|---|
| 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 |
|---|--|---|---|
- 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).

- | | | | |
|---|--|---|---|
| 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 |
|---|--|---|---|
- 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. Section V requires an exit interview within 30 days. Written comment meeting the 90 day requirement is documented in section V. Written notification of probable violations is presented during the exit interview.

- a. 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.

4	(Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident?	3	3
---	--	---	---

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

- 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. The Section requiring documentation if the operator does not go on-site is found in section VIII

5	General Comments:	Info Only	Info Only
---	-------------------	-----------	-----------

Info Only = No Points

Evaluator Notes:

There were no issues with part B.

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



PART C - State Qualifications

Points(MAX) Score

- | | | | |
|---|---|---|---|
| 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 |
| | <ul style="list-style-type: none">a. Completion of Required OQ Training before conducting inspection as leadb. Completion of Required DIMP/IMP Training before conducting inspection as leadc. Completion of Required LNG Training before conducting inspection as leadd. Root Cause Training by at least one inspector/program managere. Note any outside training completedf. 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 Jeff Baggett, Jack Hewitt, Daphne Jones, Joe Jones, David Lewis, Ken Rowe, Jason Smith, Michelle Thebert and Alan Towe. Failure qualified inspectors are Jeff Baggett, Jack Hewitt, Daphne Jones, Joe Jones, David Lewis, Ken Rowe, Jason Smith, Alan Towe and Michelle Thebert. Michelle is not listed as an inspector in the progress report. Willie Culbreath, Ben Stair, Brant Sweat and Daniel Clemmons are new and not qualified for any inspections yet.

- a. OQ qualified inspectors are Jeff Baggett, Jack Hewitt, Daphne Jones, Joe Jones, David Lewis, Ken Rowe, Jason Smith, Alan Towe and Michelle Thebert.
- b. Gas IMP qualified inspectors were Jeff Baggett, Daphne Jones, David Lewis, Jason Smith and Alan 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, Alan Towe and Michelle Thebert.
- d. Root Cause trained personnel are Jeff Baggett, Jack Hewitt, Daphne Jones, Ken Rowe, Jason Smith and Alan Towe.
- e. Outside training was provided. The State sent inspectors to the Appalachian Corrosion control school in 2022.
- f. Inspectors were qualified to perform inspections that were reviewed as part of this evaluation.

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

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.

- | | | | |
|---|--|-----------|-----------|
| 3 | General Comments:
Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

There were no issues with Part C.

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

PART D - Program Performance**Points(MAX) Score**

- | | | | |
|----------|---|----------|----------|
| 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 | 4 |
| | <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:

There were several instances of inspections exceeding the required five-year interval.

- a. For standard inspections, the most recent inspection frequency was exceeded for the City of Fort Valley. Previous inspection frequencies were exceeded for City of Thomasville, City of Moultrie, City of Adairsville, City of Ashburn, Fitzgerald Water and Light, City of Toccoa transmission and Warren Robbins transmission.
- h. DIMP previous inspection frequencies were exceeded for City of Hogansville, Mid-State Energy Commission, Louisville Gas and water, Dalton Water and Gas. City of Toccoa, City of Adairsville, and Fitzgeralds Water and Gas.
- b. For Public Awareness inspections, previous inspection frequencies were exceeded for Cities of Hogansville, Covington, Fort Valley, Mid States Energy Commission, Louisville Gas and Water, Moultrie, Dalton, Toccoa, Adairsville, Ashburn Fitzgerald Water and Light,
- c. Drug and Alcohol inspections previous inspection was exceeded for Warner Robbins Transmission.
- d. Control Room Management inspections were within the required five-year frequencies.
- e. LNG operators were not on the random operator list for this years evaluation.
- f. Construction days were not met in 2022 but GA receiver a point waiver because of the 114 inspection initiative.
- g. Most recent inspection frequencies were exceeded for the city of Fort Valley, Mid State Energy Commission, Cities of Toccoa, and Ashburn.

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

Georgia uses the IA equivalent form and a supplement which addresses state rules, NTSB recommendations and advisory bulletins. Inspections were reviewed and forms were filled out completely. Standard, Public awareness, Drug and Alcohol Operator Qualification and DIMP inspections were reviewed.

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

Evaluator Notes:

OQ inspections are scheduled to be performed at five-year intervals. Protocol 9 is done for all standard inspections. Qualified personnel performed OQ inspections.

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

Evaluator Notes:

IMP and DIMP inspections are scheduled to be performed every five years including an annual review of the largest operators.

- a. Atlanta Gas and Light is the largest operator. They receive an annual IMP/DIMP review. A report is written as a result of the review.
- b. This issue is addressed on the state supplemental inspection form. Tallapoosa Has less than a .14 miles of cast iron pipe. They are waiting for rail permit to replace the last of the State's cast iron. 33 miles of bare steel remain Between 9 operators.
- c. This question is also on the state supplemental form. There are no low-pressure distribution systems in the State.

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

Evaluator Notes:

NTSB recommendations are addressed through the use of a state supplemental form,

- a. NTSB recommendations are addressed in the Public Service Commission rules inspection form. This supplemental form is filled out for all standard inspections.
- b. NTSB recommendations are addressed in the Public Service Commission rules inspection form. This supplemental form is filled out for all standard inspections.
- c. NTSB recommendations are addressed in the Public Service Commission rules inspection form. This supplemental form is filled out for all standard inspections.
- d. NTSB recommendations are addressed in the Public Service Commission rules inspection form. This supplemental form is filled out for all standard inspections.
- e. NTSB recommendations are addressed in the Public Service Commission rules inspection form. This supplemental form is filled out for all standard inspections.
- f. NTSB recommendations are addressed in the Public Service Commission rules inspection form. This supplemental form is

filled out for all standard inspections.

g. NTSB recommendations are addressed in the 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 |
|---|--|---|---|

Evaluator Notes:

2022 advisory bulletin on geological impacts was addressed in the April 2023 gas seminar. Michelle showed the slides she used during the April seminar.

- | | | | |
|---|---|----|----|
| 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 | 10 | 10 |
|---|---|----|----|
- 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)

Evaluator Notes:

Reports were reviewed, all violations identified in the checklist were addressed in compliance letters and subsequent compliance actions.

- a. All compliance letters were sent the chief executive officer or mayor/city manager
 - b. All violations identified in checklists were properly documented
 - c. Probable violations were properly resolved.
 - d. Outstanding violations remain open in the data base. They are expected to be addressed during standard inspections. A clearing enforcement response letter is sent when violations are clear. Follow up inspections are done whenever there is a outstanding violations. An Operator response form is sent to the operator and resubmitted to Commission. This form documents the operators response to the probable violation.
 - e. All unsatisfactory items in checklist were addressed in compliance letters and subsequent compliance activities.
 - f. \$43000 in penalties were collected in 2022. \$805,000 in penalties was assessed.
 - g. All compliance letters are signed and reviewed by the Michelle.
 - h. Operators have the opportunity for a hearing. Opportunity for hearing is documented in the compliance letter.
 - i. For inspections that were reviewed, all exit interviews were conducted within 30 days of the final inspection day.
 - j. Written notification of preliminary findings is presented during the exit interview.
-

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

There were no federally reportable incidents in 2022. There were two incidents in WMS that appear to be non jurisdictional. 11/16/22 odor complaint which could not identified and 12/13/22 house fire concluded to be a non-jurisdictional murder/suicide.

- a. Operators are given pipeline staff phone numbers, Staff contacts Jeff and he coordinates incident activities.
- b. N/A, there were no incidents in 2022.
- c. N/A, there were no incidents in 2022.
- d. N/A, there were no incidents in 2022.
- e. N/A, there were no incidents in 2022.
- f. N/A, there were no incidents in 2022.
- g. N/A, there were no incidents in 2022.
- h. AID called regarding the two non-incidents to ascertain the status of those events.
- i. Lessons learned from incidents are shared at the Southern Region NAPSR meeting.

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

Evaluator Notes:

Chairman letter to Tricia Pridemore went out 6/7/22. There were three issues. The response was sent on 8/11/22. The letter accepted PHMSA findings. Tricia will be chairwoman until July. The new chair has not been voted on yet.

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

Evaluator Notes:

A seminar was held in April 2023. The last seminar was performed on April 2022. A virtual seminar was in 2021. Seminars are done annually.

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

Evaluator Notes:

Georgia uses the PHMSA form which is 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).
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

The Web page lists contact information, PHMSA metrics, best practices and Georgia 811 information. Information is also forwarded to the Georgia municipal Association.

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

Evaluator Notes:

There was one safety related condition on 1/31/22 for Atlanta light and Gas (ALG). This was an overpressure event. This SCR was closed in WMS. The SRC resulted in a warning letter which was submitted to ALG. A closure letter was ultimately sent.

14	Was the State responsive to: Yes = 1 No = 0 Needs Improvement = .5	1	1
-----------	---	---	---

- a. Surveys or information requests from NAPSR or PHMSA; and
- b. PHMSA Work Management system tasks?

Evaluator Notes:

- a. Michelle responds to NAPSR surveys.
- b. There were three WMS entry's. There were two non-jurisdictional incidents and a Safety Related Condition. All three entries were closed.

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

Evaluator Notes:

The PHMSA data base identifies Two waivers. A 7/9/93 waiver was issued to Anhyser Busch and 9/6/17 for Hurrigan Irma. It appears both waivers can be closed. Michelle sent a request to Jennie Donahue, Nov 4, 2022. The waivers are still on the PHMSA web page. Michell was asked to resubmit a request to the OPS waiver page listed in guidelines. Michelle resent request to the PHMSA State waive page.

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

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

Evaluator Notes:

Peer review comments suggest that Georgia identify risk concerns on the SICT submission. Georgia was also asked to check control room days for Atlanta Gas. Michelle addressed these issues.

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

Evaluator Notes:

Michelle and Jeff were directed to the metrics page. Metrics were discussed.

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 = No Points	Info Only	Info Only
-----------	---	-----------	-----------

- a. <https://pipelinesms.org/>
- b. Reference AGA recommendation to members May 20, 2019

Evaluator Notes:

Safety Management systems is discussed as an item in the State supplemental checklist.

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

Evaluator Notes:

There will be a point deduction for not meeting the 5-year inspection intervals.

Total points scored for this section: 49
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:

- LNG standard inspection. The LNG inspection was conducted at the Cherokee facility in Canton, Georgia. A new LNG tank was under construction along with vaporization equipment to be installed. This unit was last inspected in March. The following individual were present: James Hotinger, Compliance & Richard Rogers, Managing Operations Southern Gas Company, Ralph McCollum, Compliance and Doug Watkins-AGL LNG- Plant Manager. Joe Jones, GA Inspector was the lead inspector who was observed. Other GA PSC inspectors present were Jack Hewitt, Jeff Baggett & Alan Towe.
- The second inspection was a transmission line construction project in Dawsonville, GA. This was an ongoing inspection and last observed in May. The lead inspector on this inspection was Jack Hewitt. The eleven-mile transmission project runs across Forsyth and Dawson Counties and will be a major supply of natural gas to North Georgia.

- 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, Joe Jones used GA PSC/PHMSA Form 25 to conduct the inspection. Mr. Jones followed the format and asked questions from the form to the operator representatives present.
- Yes, Jack Hewitt used GA PSC Construction form and other related documents to conduct the construction inspection. It was observed by this writer both inspectors recorded responses from the operator as the questions were asked. Excellent notes were recorded in each inspection form.

- 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, inspections forms, and questions presented by the inspectors to the operator clearly demonstrated information in determining compliance with safety regulations.
- Yes, both inspectors conducted in-depth review of the operator's records and field maps during their inspections.
- A plant tour of the new LNG tank was conducted to monitor compliance with safety practices and regulations. Additionally, the field inspection of the 16-inch steel transmission line in Dawsonville was observed checking welding certifications and procedures.
- Yes, both inspections were of adequate length in determining compliance. However, the new LNG facility will be monitored monthly over the next 18 months until the project has been completed.

- 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. Jo Jones and Mr. Jack Hewitt have completed all TQ Courses and highly qualified in pipeline safety regulations. Both inspectors were thorough in their review of the operator's records and construction practices.

- 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:

Yes, Mr. Joe Jones and Mr. Jack Hewitt conducted exit interviews immediately after the inspections were completed. Several questions were asked by the operator about the pipeline safety regulations and answered by each inspector.

- 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:

Safety practices were followed during the LNG tank inspection and Construction project. Each inspector following safety practices at the construction sites. In this regard, hard hats, safety boots, eye and ear protection were being used.

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

Evaluator Notes:

Safety practices were followed during the LNG tank inspection and Construction project. Each inspector following safety practices at the construction sites. In this regard, hard hats, safety boots, eye and ear protection were being used.

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 inspections. 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. The Park D spreadsheet was forwarded and discussed with Michelle and Jeff.

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

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
	Info Only = No Points	

Evaluator Notes:

There were no issues with 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:

GA PSC is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

GA PSC is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

GA PSC is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

GA PSC is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

GA PSC is not an interstate agent and does not have a 60106 agreement with PHMSA.

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

Evaluator Notes:

GA PSC is not an interstate agent and does not have a 60106 agreement with PHMSA.

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