



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

Office of Regulatory Staff of South Carolina

## 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:** South Carolina

**Agency Status:**

**Date of Visit:** 08/14/2023 - 08/18/2023

**Agency Representative:** John Iglesias, Program Manager

Johnny Eustace, Prior Program Manager

Thomas McGill, Assistant Manager of Safety, Transportation & Emergency Response

Tom Allen, ORS Chief

Larry Bryant, Inspector

Will Berley, Inspector

Glen Bishop, Inspector

**PHMSA Representative:** Glynn Blanton, State Liaison, PHMSA State Programs

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

**Name/Title:** Nanette Edwards, Executive Director, Nanette Edwards, Executive Director

**Agency:** South Carolina Office of Regulatory Staff

**Address:** 1401 Main Street, Suite 900

**City/State/Zip:** Columbia,, South Carolina 29201

**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  
15  
10  
50  
15  
10  
0

0  
13  
9  
47  
15  
10  
0

#### TOTALS

**100 94**

**State Rating .....**

**94.0**

## 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
- a.    Stats On Operators Data - Progress Report Attachment 1
  - b.    State Inspection Activity Data - Progress Report Attachment 2
  - c.    List of Operators Data - Progress Report Attachment 3\*
  - d.    Incidents/Accidents Data - Progress Report Attachment 4\*
  - e.    Stats of Compliance Actions Data - Progress Report Attachment 5\*
  - f.    List of Records Kept Data - Progress Report Attachment 6 \*
  - g.    Staff and TQ Training Data - Progress Report Attachment 7
  - h.    Compliance with Federal Regulations Data - Progress Report Attachment 8
  - i.    Performance and Damage Prevention Question Data - Progress Report Attachment 10\*

### Evaluator Notes:

- a. A review of Attachment 1 found the number of master meter units is incorrect. Columbia Housing Authority is no longer a Master Meter operator. This error occurred in last year's program evaluation review and was corrected. Will need to have Program Manager (PM) contact Carrie Winslow to correct document.
- b. Number of standard, construction and total inspections increased from previous years. Construction inspections exceeded the required number of 69 inspections.
- c. Attachment 3 does not match attachment 1 in regard to the number of master meter units.
- d. A review of PHMSA Portal confirm the number of incidents (4) match attachment 4.
- e. Three compliance actions were issued in CY2022. No civil penalties issued in CY2022. Three violations were found and corrected at year end period. No carryover violations from previous year.
- f. Records appear to be filed and maintained in accordance with Federal and State Polices.
- g. A review of TQ Blackboard information found that all four inspectors are Gas & IM Qualified. Three of the four inspectors have completed the Root Cause course. All four inspectors have completed the LNG course.
- h. ORS has automatic adoption of regulations but been unsuccessful in increasing their civil penalties to the Federal level of \$100,000 to \$1 M.
- J. A review of attachment 10 found no issues with contain and summary of performance.

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



## PART B - Program Inspection Procedures

Points(MAX) Score

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

### Evaluator Notes:

This writer received an updated copy of the South Carolina Office of Regulatory Staff, Procedures and Guidelines for the Pipeline Safety Program, revised 5/17/2022, on August 15, 2023. These procedures were in effect for the entire year of 2022.

- a. Yes, Standard inspections procedures are located under Inspection Activity on pages 3-10.
- b. Yes, IMP & DIMP inspections are listed separately and located on pages 10 and 9.
- c. OQ Inspections are located on page 5 under Inspection Activity.
- d. Yes, Damager Prevention inspections are located on page 9.
- e. Yes. On-Site Operator Training is located on page 3 under the title Inspection Activity.
- f. Yes. Construction inspections are located on page 6.
- g. LNG inspections was added and now on page 3.

- |   |   |   |   |
|---|---|---|---|
| 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<br>Yes = 4 No = 0 Needs Improvement = 1-3  | 4 | 4 |
|   | <ul style="list-style-type: none"><li>a. Length of time since last inspection</li><li>b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)</li><li>c. Type of activity being undertaken by operators (i.e. construction)</li><li>d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.)</li><li>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)</li><li>f. Are inspection units broken down appropriately?</li></ul> |   |   |

### Evaluator Notes:

- a. thru e. Yes, these items are listed in ORS Procedures and Guidelines for the Pipeline Safety Program INSPECTION ACTIVITY, item 4 on page 3. Additionally, all operators are inspected annually by ORS.
- f. A review of inspection units found them to be broken down correctly. No issues.

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

### Evaluator Notes:

- a. Yes, this item is located in ORS Procedures and Guidelines for the Pipeline Safety Program under section entitled, NON-COMPLIANCE INSPECTION GUIDELINES, page 11.
- b. Yes, this is listed in Paragraph 5 through 10 on page 11 & 13.
- c. Yes, this is listed in Paragraph 13 and 16 on page 13.

- 4 (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident? 3 1
- Yes = 3 No = 0 Needs Improvement = 1-2
- Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports
  - 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:

- Yes, this is listed on page 10 under the title. "Incidents". The information provided is not up to date with PHMSA AID contact names and telephone numbers. This writer provided information on contact name to Program Manager.
- This information is not in the procedures. The procedures do not contain a process for collecting information when an onsite investigation is NOT conducted nor a memo or other documentation to describe why an on-site investigation was not done. The emergency contact name listed on SC ORS website has the previous PM Vernon Gainey name and telephone number listed. A loss of two points occurred.

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5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

A loss of two points occurred on Question B.4.

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Total points scored for this section: 13  
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<br>Yes = 5 No = 0 Needs Improvement = 1-4  | 5 | 5 |
|   | <ul style="list-style-type: none"><li>a. Completion of Required OQ Training before conducting inspection as lead</li><li>b. Completion of Required DIMP/IMP Training before conducting inspection as lead</li><li>c. Completion of Required LNG Training before conducting inspection as lead</li><li>d. Root Cause Training by at least one inspector/program manager</li><li>e. Note any outside training completed</li><li>f. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1)</li></ul> |   |   |

**Evaluator Notes:**

A review of TQ Blackboard records on 06-22-2023 found the following information.

- a. Yes, all four inspectors have completed the OQ training course and can lead an inspection.
- b. Yes, all four inspectors have completed DIMP/TIMP course and can lead an inspection.
- c. Yes, all four inspectors have completed the LNG course.
- d. Yes, all four inspectors have completed the Root Cause course.
- e. No outside training was attended during the evaluation period.
- f. All four inspectors and Program Manager have completed all courses and can conduct standard inspections.

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

**Evaluator Notes:**

On July 11, 2023, Mr. Zach Barrett received an official letter from Nanette Edwards, South Carolina Office of Regulatory Staff regarding the appointment of John Iglesias as the Pipeline Safety Manager. Mr. Iglesias has been with SC ORS for eight years as an inspector and completed all TQ courses to conduct pipeline and LNG inspections. Due to the short period of time as the Program Manager, less than one year, a loss of one point occurred.

- |   |  |           |           |
|---|--|-----------|-----------|
| 3 | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

**Evaluator Notes:**

A loss of one point occurred on Question C.2

Total points scored for this section: 9  
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<br>Yes = 5 No = 0 Needs Improvement = 1-4  | 5 | 5 |
|   | <ul style="list-style-type: none"><li>a. Standard (General Code Compliance)</li><li>b. Public Awareness Effectiveness Reviews</li><li>c. Drug and Alcohol</li><li>d. Control Room Management</li><li>e. Part 193 LNG Inspections</li><li>f. Construction (did state achieve 20% of total inspection person-days?)</li><li>g. OQ (see Question 3 for additional requirements)</li><li>h. IMP/DIMP (see Question 4 for additional requirements)</li></ul> |   |   |

### Evaluator Notes:

The randomly selected operators to be reviewed for required inspection intervals are listed below.

FORT HILL NATURAL GAS AUTH, LAURENS COMMISSION OF PUBLIC WORKS, ORANGEBURG PUBLIC UTILITIES, GREENWOOD COMMISSION OF PUBLIC WORKS, PATRIOTS ENERGY GROUP, DOMINION ENERGY SOUTH CAROLINA, INC -BUSHY PARK LNG & SALLEY LNG, Aiken Housing Authority, Easley Housing Authority, Laurens Housing Authority and S. C. Regional Housing Authority # 1.

Information on the inspection dates was provided in a separate spreadsheet. The dates were verified and resulted in no issues. SC ORC continue to annually inspect all operators. Construction inspections performed in CY2022 exceeded the required 20% level.

- |   |   |    |    |
|---|---|----|----|
| 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?<br>Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
|   | <ul style="list-style-type: none"><li>a. Standard (General Code Compliance)</li><li>b. Public Awareness Effectiveness Reviews</li><li>c. Drug and Alcohol</li><li>d. Control Room Management</li><li>e. Part 193 LNG Inspections</li><li>f. Construction</li><li>g. OQ (see Question 3 for additional requirements)</li><li>h. IMP/DIMP (see Question 4 for additional requirements)</li></ul>  |    |    |

### Evaluator Notes:

Yes. A review of SC ORS forms used to perform inspections on the randomly selected operators was conducted and found all applicable portions on the forms were complete with required information. No areas of concerns were found, and all applicable code requirements were addressed.

- |   |  |   |   |
|---|--|---|---|
| 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

### Evaluator Notes:

Yes. A review of OQ inspection records for those operators randomly selected for this review found OQ programs were inspected, and plans updated. No issues.

- 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:

- a. Yes, Dominion Energy Company Integrity Management Plan was checked in the additional questions set to ORS inspection form. The inspection was performed in March 2022.
- b. Yes, ORS reviews this item in the annual report review.
- c. There are no low-pressure distribution systems located in the State of South Carolina.

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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 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:

- (a.-b.) A review of PHMSA Portal found there is no cast-iron pipe in the State of South Carolina.
- c. Question #5 on page 44 of the Distribution Standard Comprehensive Inspection form covers this requirement. This item is in the additional question set.
- d. Question on page 47 of the Distribution Standard Comprehensive Inspection form covers this requirement.
- e. The ORS added a Question 5 on all standard comprehensive page 44. Also, on the construction form page 7.
- f. No low-pressure systems in the State of SC Operator. However, this item is listed on question 7 on Page 42.
- g. The ORS has a question on Page 46 on its inspection form. There are no low-pressure systems or inside meter sets in South Carolina. This is verified by a letter sent to the operators questioning a response to this item.

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

Evaluator Notes:

- This item is included in the additional question set entitled, All PHMSA Advisory Bulletin on page 49.



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	10	9
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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)

Evaluator Notes:

- a. Yes. A review of the three probable violations that were issued and cleared in CY2022 found the letters were sent to the City Administrator or General Manager of the systems.
- b. Yes, violations were document in the letter and reports.
- c. Yes, operator took corrective action to clear violations sited within 90 days.
- d. Yes, Program Manager reviews violations until resolved by operator.
- e. Yes, compliance action was taken on two operators. Violations were cleared within a timely manner.
- f. No. SC ORS has not issued a civil penalty nor demonstrate a penalty has been issued within the previous ten years. A loss of one point occurred on this item.
- g. Yes
- h. Yes
- i. Yes
- j. Yes, this is listed in their procedures.

8	(Incident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations?	10	8
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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:

A review of the four incidents that occurred in CY2022 were conducted by downloading the Incident reports from PHMSA Portal. The incidents involved two on Piedmont Natural Gas and two on Dominion Energy South Carolina facilities. No injuries or fatalities occurred.

- a. It appears SC ORS has adequate means to receive and respond to reports submitted by operators on incidents.
- b. Yes
- c. No onsite investigation was not conducted on Piedmont Natural Gas Company incident that occurred on May 4, 2022. Information about the incident was related to Program Manager but not physical inspection was conducted. The second incident on Piedmont Natural Gas Company occurred on May 10, 2022, at Boiling Springs, SC. This incident was investigated by SC ORS, but no report was placed in the file. The third incident was with Dominion Energy that occurred on July 7, 2022, at Augusta Road in Lexington, SC. This incident was investigated, and a report filed within the agency. The fourth incident was on Dominion Energy that occurred on December 15, 2022. This incident was investigated, and a report of the findings was included in the report. However, recommendations to prevent recurrence was not listed in the report.
- g. No compliance action was taken due to no violations found. No contributing factors were provided in the report.
- h. Yes cooperation was maintained between AID and SC ORC.
- i. Yes, the four incident that occurred were discussed and presented at the recent pipeline seminar.

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<b>9</b>	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
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Evaluator Notes:

Yes, Nanette Edwards, Executive Director, response letter to Zach Barrett was received within the required sixty-day requirement.

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<b>10</b>	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
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Evaluator Notes:

Yes, the last pipeline safety seminar at Embassy Suites in Columbia, SC on November 2 & 3, 2022. Number of participants were 124.

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<b>11</b>	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
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Evaluator Notes:

Yes, this item is listed on the standard inspection form. It is the first question on the form.

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

Yes, this is accomplished via the SC website.

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<b>13</b>	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
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Evaluator Notes:

A review of PHMSA Portal found no safety related conditions reports were filed in CY2022.

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<b>14</b>	Was the State responsive to: Yes = 1 No = 0 Needs Improvement = .5 a. Surveys or information requests from NAPS or PHMSA; and b. PHMSA Work Management system tasks?	1	1
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Evaluator Notes:

Yes, responses were provided to all survey request during CY2022.

- 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:

SC ORS continues to have one active waiver concerning the use of high-pressure PE pipe that was not covered in standards for use. The operator, Ameresco Palmetto, LLC, must comply with the condition that requires pipe samples to be removed and tested once every three years. The last test was performed in June 2021. The ORS has verified that the operator complies with a letter from Ms. Jocelyn Boyd, Chief Clerk/Executive Director dated November 5, 2021. No issues.

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

Evaluator Notes:

Yes, a review of electronic files found them to be accessible and in good condition.

- 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:

Yes. The SICT data was submitted to PHMSA on March 23, 2023. The program manager is very familiar with the SICT and did add comments on the rank risking categories.

- 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:

Excavation damages per 1000 tickets is trending up in 2022 to 3.0. This trend is lower than the National Average. The National Average is slightly above 3.2. Total leaks eliminated /repaired remains at 202. Hazardous Leaks eliminated has trended upward from 74 to 76. Leaks scheduled for repair is trending downward from 77 to 61. South Carolina has initiated and continues to support a committee to enhance damage prevention enforcement actions. The ORS has a seat on a committee to support enforcement and support the Attorneys General office to pursue prosecution of individuals who fail to comply with the State's damage prevention law.

- 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:

SC ORS included SMS on their inspection visits. Erin Kurilla from APGA spoke at Pipeline Safety Seminar held on November 3, 2022, and included SMS.

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

Evaluator Notes:

Loss of points occurred on questions D.7 & D.8

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:

- This was a corrosion control inspection performed on Greer Commission of Public Works (Greer CPW) in Greer, SC. Mr. Larry Bryant, Will Berley & Glenn Bishops participate in the inspection. Mr. Bryant was the lead inspector.
- The unit was last inspected on March 6, 2023. The type of inspection performed was a field inspection of pipe casings and valves.
- Yes, the following company individuals were present: Robert Rhodes, Gas Operations Manager, Jonathan Corley, Compliance Superior, Keth Almond, Kevin Kinard & Lenny Kimball.
- Larry Bryant has not been observed by this observer before and was selected for this year's field observation.

- 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. Bryant was using the agency's corrosion control 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, it was observed by this writer Mr. Bryant asking questions from the inspection form to the operator's representatives regarding their procedures.
- Yes, corrosion control records were reviewed and checked for compliance.
- Yes, during the field inspection the pipe-to-soil equipment was checked, and verification of calibration date was performed. No issues with equipment.
- A review of a service meter located at 303 Morrow Street in Greer, SC found bollards will need to be installed to prevent damage to the meter set.
- Yes, the full day inspection covered several areas and was of adequate length.

- 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, two of the three inspectors are gas qualified. One inspector has recently attended the PL1250 course and other courses at TQ.

- 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. Larry Bryant conducted an exit interview with Greer Company representatives. He reviewed the areas of concern and requested the operator update their 2022 Operator Annual Report that contained an error in Part D.

---

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:

a. thru d. Yes. while performing the field corrosion control readings at random locations all individuals were wearing safety vest, steel toe boots, safety glasses and being observant of traffic flow. Excellent safety measures were being taken by all personnel.

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7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section of the review.

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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**

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues.<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

**Evaluator Notes:**

Inspectors prior to conducting an inspection will review the operator's Annual Reports and Incident Reports for errors or trends. Items noted in the reports with errors or high trends are discussed with operators at the beginning of the inspections. Additionally, ORS requires operators to submit annual report on excavation damage data to them on a monthly basis. The full year totals from the monthly data are compared to annual report submittals.

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | 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)<br>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)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

**Evaluator Notes:**

Yes, excavation damage data continues to be collected by ORS and provided to SC 811. The data is reviewed and after six months, the ORS will schedule a visit with each operator to discuss any issues found in the data. The visits continue to be focus on the four causes of damages as listed in the Annual Reports. Fiber companies are the stakeholder causing the largest number of damages in SC. Operators are continuing to take steps to mitigate risk to their facilities by having meetings with contractors and other outside parties.

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

**Evaluator Notes:**

Yes, items a thru e.  
f. The number of damages resulting from mismarks was 467 in CY2022.  
g. The number of damages resulting from not locating within time requirements was 706 in CY2022  
h. Yes, this item is reviewed during the pipeline safety inspection visits.  
i. Yes, the causes for the damages listed under "Excavation Practices Not Sufficient" in CY2022 was 11,358.

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | 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?<br>Yes = 2 No = 0 Needs Improvement = 1 <ol style="list-style-type: none"><li>a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.</li><li>b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages?</li></ol> | 2 | 2 |
|----------|---|---|---|

- 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:

- a. Fiber installation by telecommunications companies remains the stakeholder causing the most damages in South Carolina.
- b. 811 is providing operator training for parties causing damages.
- c. The reason for excavation damages occurring in SC is failure to not test-hole the location of the facilities.
- d. Yes, operators are providing training.

---

**5** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

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

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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:

SC ORS 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:

SC ORS 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:

SC ORS 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:

SC ORS 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:

SC ORS 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:

SC ORS 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