



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

1200 New Jersey Avenue SE  
Washington DC 20590

# 2023 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



# 2023 Gas State Program Evaluation -- CY 2023

## Gas

**State Agency:** South Carolina

**Agency Status:**

**Date of Visit:** 05/20/2024 - 05/24/2024

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

Thomas McGill, Deputy Director of Transportation and Safety

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:** Andrew M. Bateman, Acting 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 2023 (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

0  
15  
10  
50  
15  
10

0  
15  
10  
48  
15  
10

#### TOTALS

**100 98**

**State Rating** .....

**98.0**

## 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 it satisfactory.
  - b. Number of standard, construction and total inspections was less than previous years. Construction inspections exceeded the number required.
  - c. Attachment 3 data matched attachment 1.
  - d. A review of PHMSA Portal confirm no incidents.
  - e. Two compliance actions were issued in CY2023. No civil penalties issued. Two violations were found and corrected at year end period. No carryover violations from previous year.
  - f. List of records was provided with detail information.
  - g. TQ Blackboard data confirmed three inspectors are Gas & IM Qualified. Two inspectors have completed the Root Cause course. Three inspectors have completed the LNG course.
  - h. SC ORS has automatic adoption of regulations. Legislative action has been taken to increase civil penalties to the Federal level. HB/Senate Bill has passed and awaiting approval by Governor.
  - J. Attachment 10 is satisfactory and no issues.
- 2023 Progress Review score was 46 points. Four-point deduction due to maximum civil penalty amount.

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:

SC ORS reviewed/updated their O&M Plan effective 02-08-24.

- a. Yes, this is listed under Inspection Activity on page 3.
- b. Yes, IMP & DIMP inspections are listed on pages 9 and 10.
- c. Yes, OQ inspection is listed on page 5.
- d. Yes, Damage Prevention inspections are listed on page 9.
- e. Yes, On-Site Operator Training is listed on page 3.
- f. Yes, Construction inspections are located on page 6.
- g. Yes, LNG inspections are listed under Inspection Activity 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:

Yes, Activity Section of procedures located on pages 3-4 address inspection priorities, scheduling and rank risking of operators.

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

Yes, post procedures are listed in Non-Compliance Inspection Guidelines Section pages 11-14.

- |   |  |   |   |
|---|--|---|---|
| 4 | (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident?<br>Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
|   | <ul style="list-style-type: none"><li>a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports</li></ul>                       |   |   |

- 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:

- a. Yes, Section "Incidents" on page 10 cover all items pertaining to incident/accident investigations.

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**5 General Comments:**

Info Only Info Only

Info Only = No Points

Evaluator Notes:

All items in Section B are satisfactory.

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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<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. Yes, TQ Blackboard records show three inspectors have completed training courses and can lead an inspection.
- b. Yes, three inspectors have completed DIMP/TIMP course.
- c. Yes, three inspectors have completed the LNG course.
- d. Yes, two inspectors have completed the Root Cause course.
- e. No outside training.
- f. Yes, all inspectors 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 | 5 |
|---|--|---|---|

Evaluator Notes:

Yes, Mr. Iglesias has been the Program Manager for one year and nine years with SC ORS as an inspector. He demonstrated a working knowledge of PHMSA program and regulation requirements.

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

Evaluator Notes:

All items in Section C were found to be satisfactory.

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



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

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | 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 <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> | 5 | 5 |
|----------|--|---|---|

**Evaluator Notes:**

Random selected operator inspection records were checked. All inspection types were confirmed to have occurred within the five-year time interval requirement established in SC ORS procedures.

- |          |  |    |    |
|----------|--|----|----|
| <b>2</b> | 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 <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> | 10 | 10 |
|----------|--|----|----|

**Evaluator Notes:**

Yes, a review of all types of inspections and the report forms found all questions are being addressed by the inspectors including areas where an N/A was entered into the form.

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|----------|--|---|---|
| <b>3</b> | 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, they are conducting OQ Program evaluations in accordance with their procedures. Operator's employees OQ requirements are checked during construction and field inspections.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 <ul style="list-style-type: none"><li>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?</li><li>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?</li><li>c. Are the states verifying operators are including low pressure distribution systems in their threat analysis?</li></ul> | 2 | 1 |
|----------|--|---|---|

Evaluator Notes:

- a. No, Dominion Energy South Carolina and Piedmont Natural Gas IMP Plans were not reviewed. A loss of one point occurred on this item.
- b. Yes
- c. No low-pressure distribution system 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 Yes = 2 No = 0 Needs Improvement = 1	2	2
	<ul style="list-style-type: none"><li>a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken;</li><li>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);</li><li>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;</li><li>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;</li><li>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;</li><li>f. Operator procedures for considering low pressure distribution systems in threat analysis?</li><li>g. Operator compliance with state and federal regulations for regulators located inside buildings?</li></ul>		

Evaluator Notes:

- a. & b. No cast-iron pipe in the State of South Carolina.
- c. Yes, this is list on page 10 of the Distribution Standard Comprehensive Inspection.
- d. Yes
- e. Yes, this item is on page 45 on ORS standard inspection form.
- f. No low-pressure systems in the State of SC. However, this item is listed on question 7 on Page 42.
- g. No low-pressure systems or inside meter sets in South Carolina.

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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) Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

- Yes, this is addressed on the additional question set.

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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	9
	<ul style="list-style-type: none"><li>a. Were compliance actions sent to company officer or manager/board member if municipal/government system?</li><li>b. Were probable violations documented properly?</li><li>c. Resolve probable violations</li><li>d. Routinely review progress of probable violations</li><li>e. Did state issue compliance actions for all probable violations discovered?</li><li>f. Can state demonstrate fining authority for pipeline safety violations?</li></ul>		



- 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, letter was sent to the Town Manager.
- b. Yes
- c. Yes
- d. Yes
- e. Yes
- f. No. SC ORS has not issued a civil penalty within the previous eleven years. A loss of one point occurred on this item
- g. Yes
- h. Yes
- i. Yes
- j. Yes

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<b>8</b>	(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:

No DOT reportable incidents occurred in CY 2023.

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

Evaluator Notes:

Yes, Ms. Edwards, Executive Director, response letter was received on December 4, 2023, and within the 60-day time limit.

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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	Info Only
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Info Only = No Points

Evaluator Notes:

Yes, the last pipeline safety seminar at Embassy Suites in Columbia, SC on November 2 & 3, 2022

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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 = No Points	Info Only	Info Only
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Evaluator Notes:

Yes, this item is listed on the standard inspection 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
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Evaluator Notes:

Yes, this is accomplished by group email to all operators and their website.

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
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Evaluator Notes:

No safety related condition reports during this evaluation period.

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

Yes, Program Manager has responded to NAPSRS monkey surveys when they are received.

Yes, Program Manager has responded to WMS when they are received.

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
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Evaluator Notes:

SC ORS continues to have one active waiver concerning the use 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. A test is schedule to be performed in 2024.

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

Yes, satisfactory.

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
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Evaluator Notes:

Program Manager is familiar with the program and will be submitting the data by July, 2024.

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

Excavation damages per 1000 tickets is staying flat in 2023 @ 3.0. The National Average is 2.52. Total leaks eliminated / repaired remains at 194. Hazardous Leaks eliminated has trended upward from 76 to 72. Leaks scheduled for repair is trending downward from 61 to 52.

- 
- 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:

Yes, they are aware and promote the PSMS.

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

Evaluator Notes:

A loss of one point occurred on Questions D.4 & D.7.

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Total points scored for this section: 48  
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 valve inspection.
- On April 8, 2023, a transmission comprehensive inspection was performed.
- Yes, Dominion Energy Company located in Cayce, SC
- Yes, Gus Chapman, Manager; Johnnie Waller, Engineer, Cindy Ostrander, Director Operations  
Melanie Miller, Director PSMS, Stuart Hope, Gas Journey. Redden Freeman, Ryan Douglas.  
Larry Bryant was the inspector being observed.

- 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, the inspector was using the correct form. During the inspection, an emergency call was received from Clinton-Newberry Natural Gas Authority pertaining to damages that occurred on their regulator station and release of natural gas into the atmosphere. The damage to the station was caused by a truck and vehicle colliding on Hwy 121 in Newberry, SC. Due to the release of natural gas at an operating pressure of 150 psi and one personal injury at the site, the current inspection was cancelled by Mr. Bryant.

- 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:

Unable to review the above items due to cancellation of inspection to investigate the incident that occurred in Newberry, SC.

- 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. Bryant demonstrated excellent knowledge of the pipeline safety regulations.

- 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:

No exit interview was conducted due to leaving to investigate the incident in Newberry, SC.

- 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, all items are satisfactory.

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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**

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

Yes, Program Manager receives monthly leaks and damage reports from the operators that are occurring on their systems. He monitors the monthly and annual reports and develops a spreadsheet. This information is shared with 811 and staff members. Access to PHMSA portal provides information they use.

- |   |  |   |   |
|---|--|---|---|
| 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)<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:**

Satisfactory.

- |   |   |   |   |
|---|---|---|---|
| 3 | 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, the state agency are reviewing the root cause data on the operator's annual reports and shares the information with the operator during their inspections.  
f. A review of their Monthly Leaks and Damages report found the number of damages from mismarks 414 in CY2023.  
g. The number of damages resulting from not locating within time requirements 792 in CY2023  
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 CY2023 was 11,484.

- |   |   |   |   |
|---|---|---|---|
| 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?<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 continue to be the stakeholder causing the most damages in South Carolina.
- b. Yes, 811 and operators are providing training to all parties who damage their facilities.
- c. The reason for excavation damages occurring in SC is failure to not pothole the location of the facilities.
- d. Yes.

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**5** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

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

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

