

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

2016 Gas State Program Evaluation

for

GEORGIA PUBLIC SERVICE COMMISSION

Document Legend

PART:

- O -- Representative Date and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- Program Performance
- D -- Compliance Activities
- E -- Incident Investigations
- F -- Damage Prevention
- G -- Field Inspections
- H -- Interstate Agent State (If Applicable)
- I -- 60106 Agreement State (If Applicable)



2016 Gas State Program Evaluation -- CY 2016

Gas

State Agency: Georgia

Agency Status:

Date of Visit: 05/08/2017 - 05/12/2017

Agency Representative: Michelle Thebert, Director, Office of Pipeline Safety

PHMSA Representative: Agustin Lopez, State Programs

Don Martin, State Programs

Clint Stephens, State Programs

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

Name/Title: Stan Wise, Chairman

Agency: Georgia Public Service Commission

Address: 244 Washington Street

City/State/Zip: Atlanta, Georgia 30334

Rating:

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

INSTRUCTIONS:

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2016 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. A deficiency in any one part of a multiple part question should be scored as needs improvement. Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual progress report attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART G):

The field inspection form used will allow different areas of emphasis to be considered for each question. Question 13 is provided for scoring field observation areas. In completing PART G, the PHMSA representative should include a written summary which thoroughly documents the inspection.

Scoring Summary

PARTS

A	Progress Report and Program Documentation Review
B	Program Inspection Procedures
C	Program Performance
D	Compliance Activities
E	Incident Investigations
F	Damage Prevention
G	Field Inspections
H	Interstate Agent State (If Applicable)
I	60106 Agreement State (If Applicable)

Possible Points Points Scored

10	10
13	13
48	47.5
15	12
10	10
8	8
12	12
0	0
0	0
116	112.5

TOTALS

State Rating **97.0**

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- | | | | |
|----------|---|---|---|
| 1 | Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Have discrepancy with Attachment 3. Attachment 3 has 8 LPG units where Attachment 1 has only 7. Adiar Oaks Apartments was not on last years Progress Report but came up again in 2016 Progress Report. There may have a been a glitch on the upload which caused the discrepancy. Contacted Carrie and the list has been corrected.

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

Evaluator Notes:

Reviewed Attachment 2 and compared with the GPSC Database. The total inspection days were verified and were accurate. No issues identified.

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

Evaluator Notes:

Reviewed Attachment 3 and compared with operator list. LPG operator is off by one . Will contact Carrie to check on discrepancy. List of operators has been corrected. No issues identified.

- | | | | |
|----------|--|---|---|
| 4 | Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Reviewed Attachment 4 and compared with Pipeline Data Mart for accuracy. Four incidents on the Progress Report were verified with PDM. No issues identified.

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

Evaluator Notes:

There is a concern on how many carried over violations are still open. There were 385 carried over violations from 2016. Most open violations are with one main operator (AGL) which they are working on closing out the violations. Have created a worksheet to track all open AGL violations.
After reviewing compliance files it was noted that there are violations still open dating back to 2007, mostly Master Meters. GA PSC is working on reducing/closing out these open violations. GA PSC should work on closing out the open violations to assure the operators are in compliance.

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

Evaluator Notes:

Reviewed files and they seemed to be well organized and accessible. The files are kept in paper form and electronically in their database. Any issued correspondence is kept in the files and also as docket numbers in their GA PSC website which is accessible to the public.

- | | | | |
|----------|--|---|---|
| 7 | Was employee listing and completed training accurate and complete? - Progress Report Attachment 7
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Reviewed T&Q Training database to compare with Progress Report. Reviewed reports to assure inspections were lead by qualified inspector. There were no issues identified.

8	Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8	1	1
	Yes = 1 No = 0 Needs Improvement = .5		

Evaluator Notes:

Only issue is the Civil Penalty amount which is not equivalent to PHMSA. The GPSC lost two point on the Grant Review.

9	List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10	1	1
	Yes = 1 No = 0 Needs Improvement = .5		

Evaluator Notes:

Have stated goals and accomplishments in the Progress Report. There is one concern with one of their goals that states they would correct all outstanding violations over the 5 year inspection cycle. Concern is that a violation can go on for 5 years. After discussion, this is only for old inspections that have never been closed out dating back to 2007. GPSC needs to close these violations as soon as possible.

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

Evaluator Notes:

A.5- There is concern on the amount and duration of open violation. GA PSC is working on closing out old cases.

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



PART B - Program Inspection Procedures

Points(MAX) Score

- | | | | |
|---|--|---|---|
| 1 | Standard Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 2 | 2 |
|---|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Section IV has the Inspection Procedures to guide the inspectors to perform an inspection. Inspections are conducted every 5 years on distribution and transmission, LNG and propane every 24 months, and master meters every 60 months. The procedures state that an entrance and exit interview will be performed. Procedures state what the inspector should inspect during the inspections.

- | | | | |
|---|--|---|---|
| 2 | IMP and DIMP Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Section IV has the IMP and DIMP inspection procedures. Procedures state that inspections will be conducted every 5 years. Implementation of IMP inspections will also be performed every 5 years but is not written in Procedures. The GA PSC needs to add to their procedures that they will conduct field/implementation inspections to assure findings are being verified/ repaired by the operator.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

OQ Inspection procedures are in Section IV of Procedures. Will be performed every 5 years. Entrance and exit interview will be performed on all inspections. OQ inspections must be uploaded promptly. No issues identified.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Procedures state that damage prevention activities include training, public education, enforcement and review of previous accidents and failures. No issues identified.

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|---|--|---|---|
| 5 | Any operator training conducted should be outlined and appropriately documented as needed. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Procedures are in Section IV which state the training will be conducted during seminars or as requested. No issues identified.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Section IV has Construction procedures which states the activities required for construction activities. GA PSC Law requires reporting construction by operators. Rule 515-9-3-02(f). No issues identified.

- 7 Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? 6 6
Yes = 6 No = 0 Needs Improvement = 1-5
- | | | | |
|--|---------------------------|-------------------------------------|---|
| a. Length of time since last inspection (Within five year interval) | Yes <input type="radio"/> | No <input checked="" type="radio"/> | Needs Improvement <input type="radio"/> |
| b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) | Yes <input type="radio"/> | No <input checked="" type="radio"/> | Needs Improvement <input type="radio"/> |
| c. Type of activity being undertaken by operators (i.e. construction) | Yes <input type="radio"/> | No <input checked="" type="radio"/> | Needs Improvement <input type="radio"/> |
| d. Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc) | Yes <input type="radio"/> | No <input checked="" type="radio"/> | Needs Improvement <input type="radio"/> |
| e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors) | Yes <input type="radio"/> | No <input checked="" type="radio"/> | Needs Improvement <input type="radio"/> |
| f. Are inspection units broken down appropriately? | Yes <input type="radio"/> | No <input checked="" type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

- Procedures Section III have a five year inspection interval for Transmission, distribution and master meter operators. They have a two year interval for LNG operators.
- Procedures Section III take into consideration the operating history of operator to prioritize inspections.
- Section III has operator activities as part of their criteria for inspection activities.
- Section III has risk ranking of inspection which takes into account location of units.
- Procedures takes into account operating history of operators.
- Inspection units are broken down by counties. Larger operators have operating areas.

No issues identified.

8 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The GA PSC is mainly complying with Section B of the Evaluation.

Total points scored for this section: 13
Total possible points for this section: 13



PART C - Program Performance

Points(MAX) Score

- 1 Was ratio of Total Inspection person-days to total person days acceptable? (Director of State Programs may modify with just cause) Chapter 4.3 5 5
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):
990.75

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 9.58 = 2108.33

Ratio: A / B
990.75 / 2108.33 = 0.47

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

Evaluator Notes:

GA PSC met the total inspection person-days ratio. Verified days with their database and how they track the number of inspection days. No issues identified.

- 2 Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines Appendix C for requirements) Chapter 4.4 5 5
Yes = 5 No = 0 Needs Improvement = 1-4

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

Evaluator Notes:

- a. Verified that all lead inspectors are qualified to lead inspections.
- b. Reviewed IMP/DIMP inspections to assure lead inspectors are qualified to lead IMP inspections.
- c. Several GA PSC have taken the root cause training course.
- d. Inspectors did not attend any outside training in 2016.
- e. Checked in SABA and reviewed inspection reports to assure all lead inspectors are qualified to lead inspections.

- 3 Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, Michelle Thebert is knowledgeable of the PHMSA program and regulations. She has also taken the T&Q courses required by Program Managers.

- 4 Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, the GA PSC responded to the letter in 57 days. The issues in the letter were addressed in their response.

- 5 Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5 1 1
Yes = 1 No = 0

Evaluator Notes:

GA PSC conducts a Seminar every year. The last time a T&Q held the seminar was in 2015.

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|----------|--|---|---|
| 6 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|----------|--|---|---|

Evaluator Notes:

Reviewed files and found that inspections are being inspected in accordance with procedures. No issues identified.

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|----------|--|---|---|
| 7 | Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

The GA PSC utilize the PHMSA form to conduct inspections. Also utilize their own forms in the field to capture NTSB recommendations, Advisory bulletins and State regulations.

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| 8 | Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
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Evaluator Notes:

GA PSC utilizes the Federal inspection form which covers the examination of cast iron. State has less than 5 miles of cast iron in Talapusa, GA.

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|----------|--|---|---|
| 9 | Did the state review operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance) (NTSB) Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

The GA PSC utilizes the PHMSA form which complies with the surveillance of cast iron pipelines. Reviewed inspection reports to assure question is being addressed.

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|-----------|---|---|---|
| 10 | Did the state review operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21? (NTSB) Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

The GA PSC utilizes the PHMSA inspection form which covers the emergency response procedures. Reviewed inspection reports to assure question is being addressed.

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|-----------|--|---|---|
| 11 | Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 192.617? Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

Reviewed inspection reports to assure that inspections cover the review of accident and failures to ensure appropriate operator response. No issues identified.

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| 12 | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues?
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|

Evaluator Notes:

Inspectors review annual reports during the inspections to assure the accuracy. Reviewed inspection reports to assure section of form dealing with annual and incident/accident reports are being reviewed.

- 13 Did state input all applicable OQ, DIMP/IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. 2 2
Chapter 5.1
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Reviewed OQDB and there were OQ reports submitted/uploaded by the GA PSC. Reviewed database for OQ Program intervals. Some Program reviews were conducted with 10 year intervals in the past. Instructed state to assure OQ program reviews are inspected every 5 years in order to meet their procedures. Procedures were amended several years ago so State will assure they meet their procedures.

- 14 Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission? 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, reviewed NPMS and their database to compare location of pipelines. No issues identified.

- 15 Is the state verifying operators are conducting drug and alcohol tests as required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, GA PSC conducts Drug and Alcohol inspections to verify compliance with CFR 199. No issues identified.

- 16 Is state verifying operators OQ programs are up to date? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals determined in the operators plan. 49 CFR 192 Part N 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, the GA PSC conducted OQ Program and Protocol 9 inspections to verify operator OQ Plans and qualified personnel. There are some OQ programs that have been inspected every 10 years which is over the 5 year interval. This was before the 5 year interval procedure was put in effect. State assures they will start meeting their 5 year interval inspection cycle.

- 17 Is state verifying operator's gas transmission integrity management programs (IMP) are up to date? This should include a previous review of IMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review should take in to account program review and updates of operators plan(s). (Are the State's largest operators programs being contacted or reviewed annually?). 49 CFR 192 Subpart O 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, the GA PSC conducted IMP Program reviews on several operators to verify the IMP plans. They also performed Protocol A on operators to check if they have any HCAs.

The GA PSC has not conducted many field verification inspections to assure the operator is finding what the ILI run indicated. The GA PSC needs to conduct field inspections of IMP to assure ILI tool runs are accurate and repairs are being completed.

- 18 Is state verifying operator's gas distribution integrity management Programs (DIMP)? This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). (Are the State's largest operators programs being contacted or reviewed annually?). 49 CFR 192 Subpart P DIMP ? First round of program inspections should have been complete by December 2014 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, the GA PSC completed all DIMP inspections by December 2014 and performed DIMP implementation inspections in 2016.

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| 19 | Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. PAPEI Effectiveness Inspections should have been completed by December 2013. PAPEI Effectiveness Inspections should be conducted every four years by operators. 49 CFR 192.616
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|
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Evaluator Notes:

Completed all initial Public Awareness program reviews in 2013. There were no reviews conducted. Procedure allows for the inspections to be performed every 5 years.

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|-----------|--|---|---|
| 20 | 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:

Attend Georgia Municipal Meeting every year. Have regional meetings throughout the state if requested. Attend Industry meetings to meet with operators. Also have enforcement cases are available to the public on the Commission website.

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| 21 | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
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Evaluator Notes:

There were no SRCR filed in Georgia for 2016. Reviewed PDM to verify GA PSC information.

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| 22 | Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|
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Evaluator Notes:

State and PSC Rules Inspection Form has the question to ask operator if they have any plastic pipe and components that has shown defects/leaks. Reviewed inspection reports to assure the question is being asked during the inspections. No issues identified.

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| 23 | Did the state participate in/respond to surveys or information requests from NAPSRS or PHMSA?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|
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Evaluator Notes:

Yes, Michelle Thebert responds to surveys from NAPSRS and PHMSA.

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| 24 | If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate.
No = 0 Needs Improvement = .5 Yes = 1 | 1 | .5 |
|-----------|--|---|----|
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Evaluator Notes:

There is one waiver dating back to April 28, 1993. Michelle Thebert will check on status of the waiver. The operator in question hasn't been inspected since the waiver was issued. The waiver did not exempt the operator from being inspected only the use of material/testing that was used for construction. The GA PSC is in progress to perform an inspection on the operator. Due to the operator not being inspected since 1993 and not having any record of the pipeline there is a need for improvement.

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|-----------|---|---|---|
| 25 | Did the state attend the National NAPSRS Board of Directors Meeting in CY being evaluated?
No = 0 Needs Improvement = .5 Yes = 1 | 1 | 1 |
|-----------|---|---|---|
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Evaluator Notes:

Yes, Michelle Thebert attended the NAPSRS Board Meeting in 2016.

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- | | | | |
|----|---|--------------------------------------|--|
| 26 | Discussion on State Program Performance Metrics found on Stakeholder Communication site - http://primis.phmsa.dot.gov/comm/states.htm
No = 0 Needs Improvement = 1 Yes = 2 | 2 | 2 |
| a. | Discussion of Potential Accelerated Actions (AA's) based on any negative trends | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. | NTSB P-11-20 Meaningful Metrics | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

GA PSC gathers data on leaks, damages and hazardous leaks and analyze to risk rank their inspections. Data for each operator is also tracked and kept in database. The data collected and analyzed to risk rank their inspections is very good but the GA PSC needs to analyze the data to find trends and find any negative trends and find ways to address them.

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|----|--|-----------|-----------|
| 27 | Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool. (No points)
Info Only = No Points | Info Only | Info Only |
|----|--|-----------|-----------|

Evaluator Notes:

GA PSC new calculation tool inspection person days was pretty accurate with the current number of inspection person days. Used data which is currently used for their current days spend on inspection and meet their 5 year inspection interval.

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|----|--|-----------|-----------|
| 28 | Did the State verify Operators took appropriate action regarding Pipeline Flow Reversals, Product Changes and Conversions to Service? See ADP-2014-04 (No Points)
Info Only = No Points | Info Only | Info Only |
|----|--|-----------|-----------|

Evaluator Notes:

Recommend to GA PSC to add the Advisory bulletin question to their State Form to capture the pipeline flow reversal and product change to ask during an inspection.

- | | | | |
|----|--|-----------|-----------|
| 29 | General Comments:
Info Only = No Points | Info Only | Info Only |
|----|--|-----------|-----------|

Evaluator Notes:

Several OQ and IMP Program inspections have a ten year gap between inspections. Have to assure that all operators have a program IMP and OQ within the 5 year interval in the future.

C-17 Concern on IMP field inspections. GA PSC has to start conducting IMP field assessment verifications to assure ILI tool runs and repairs.

C-24 There is one waiver dating back to April 28, 1993. Michelle Thebert will check on status of the waiver. The operator in question hasn't been inspected since the waiver was issued. The waiver did not exempt the operator from being inspected only the use of material/testing that was used for construction. The GA PSC is in progress to perform an inspection on the operator. Due to the operator not being inspected since 1993 and not having any record of the pipeline there is a need for improvement.

C-26 GA PSC gathers data on leaks, damages and hazardous leaks and analyze to risk rank their inspections. Data for each operator is also tracked and kept in database. The data collected and analyzed to risk rank their inspections is very good but the GA PSC needs to analyze the data to find trends and find any negative trends and find ways to address them.

C-28 Recommend to GA PSC to add the Advisory bulletin question to their State Form to capture the pipeline flow reversal and product change to ask during an inspection.

Total points scored for this section: 47.5
Total possible points for this section: 48

PART D - Compliance Activities

Points(MAX) Score

- | | | | |
|----------|--|---|--|
| 1 | Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 3 |
| a. | Procedures to notify an operator (company officer) when a noncompliance is identified | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Procedures to routinely review progress of compliance actions to prevent delays or breakdowns | Yes <input type="radio"/> No <input type="radio"/> | Needs Improvement <input checked="" type="radio"/> |
| c. | Procedures regarding closing outstanding probable violations | Yes <input type="radio"/> No <input type="radio"/> | Needs Improvement <input checked="" type="radio"/> |

Evaluator Notes:

- a. Section V has procedure for notifying an operator on noncompliance. Also conduct exit interview to discuss noncompliance.
- b. Compliance actions are checked/followed up by performing a follow-up inspection the following year. Any open violations are verified at the beginning of each inspection.
There is no procedure to verify that the operators have responded within the time frame the NOPV provides (30 days). Tocca inspection is an example of an open NOPV that has not had any response in 2 months. (Issued in Feb and no response to date of evaluation May).
- c. Section III needs to be amended to close outstanding probable violations. Current Procedure only states that the inspector will let the Director know if he or she agrees or disagrees with the operator's response. There is no other guidance for inspectors.

- | | | | |
|----------|--|---|---|
| 2 | Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| a. | Were compliance actions sent to company officer or manager/board member if municipal/government system? | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Document probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Resolve probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. | Routinely review progress of probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e. | Were applicable civil penalties outlined in correspondence with operator(s) | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

- a. Yes, reviewed inspection reports to verify compliance actions are sent to company officer or municipal manager or mayor.
- b. There was an inspection report found that had unsatisfactory questions but not all were documented as probable violations on compliance actions. GA PSC needs to document all unsatisfactory questions as probable violations or document resolution of any issues marked unsatisfactory.
- c. Probable violations are resolved in compliance letters to the operators. Reviewed files to verify the process is being followed.
- d. The GA PSC performs follow-up inspections but sometimes there seems to be a big time gap between inspection and follow-up. The GA PSC needs to improve on the time it takes to close out cases.
- e. Yes, civil penalties are outlined in each compliance letter.

- | | | | |
|----------|--|---|---|
| 3 | Did the state issue compliance actions for all probable violations discovered?
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 0 |
|----------|--|---|---|

Evaluator Notes:

In reviewing the inspection reports, one was found with no probable violation issued for an unsatisfactory question in the inspection report. The inspection was of the City of Cordele and performed on June 23, 2016, report #JS16-026. GA PSC needs to issue a probable violations for all unsatisfactory questions or document the resolution of the issue with the operator.

- | | | | |
|----------|---|---|---|
| 4 | Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary.
Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

Yes, the GA PSC sends a response option which gives reasonable due process to all parties.

-
- | | | | |
|---|---|---|---|
| 5 | Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken) | 2 | 2 |
| | Yes = 2 No = 0 Needs Improvement = 1 | | |

Evaluator Notes:

Yes, there is a tier set for proposed civil penalties. During follow up inspections if there are repeat violations civil penalties are imposed or considered. There were civil penalties issued in 2016.

-
- | | | | |
|---|--|---|---|
| 6 | Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations? | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

Evaluator Notes:

Yes, the GA PSC issued civil penalties in 2016 which totaled \$175,000.

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

Evaluator Notes:

D-1 b. There is no procedure to verify that the operators have responded within the time frame the NOPV provides (30 days). Tocca inspection is an example of an open NOPV that has not had any response in 2 months.(Issued in Feb and no response to date of evaluation May).

c.Section III needs to be amended to close outstanding probable violations. Current Procedure only states that the inspector will let the Director know if he or she agrees or disagrees with the operator's response. There is no other guidance for inspectors.

D-3 In reviewing the inspection reports, one was found with no probable violation issued for an unsatisfactory question in the inspection report. The inspection was of the City of Cordele and performed on June 23, 2016, report #JS16-026. GA PSC needs to issue a probable violations for all unsatisfactory questions or document the resolution of the issue with the operator.

Total points scored for this section: 12
Total possible points for this section: 15



PART E - Incident Investigations

Points(MAX) Score

- 1 Does the state have written procedures to address state actions in the event of an incident/accident? 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Section VIII of the GAPSC's inspection procedures contains the written procedures for an incident. No issues identified.

- 2 Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? And did state keep adequate records of Incident/Accident notifications received? Chapter 6 2 2
Yes = 2 No = 0 Needs Improvement = 1

- a. Acknowledgement of MOU between NTSB and PHMSA (Appendix D) Yes ☒ No ☐ Needs Improvement ☐
b. Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E) Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

Section VIII of the GAPSC's inspection procedures describes how operators should notify the GAPSC of incidents. The GAPSC maintains a contact sheet that is provided to operators on at least an annual basis. The contact sheet provides operators with the method to contact for after hour reporting.

- 3 If onsite investigation was not made, did state obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

There were four reportable incidents during calendar year 2016. One incident was caused by third party excavation. As allowed in the GAPSC's procedures, an on-site investigation was not conducted. However; the GAPSC did obtain needed information from One Call System records and the GUFPA investigation to determine if the operator complied with damage prevention requirements in Part 192. No issues identified.

- 4 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? 3 3
Yes = 3 No = 0 Needs Improvement = 1-2

- a. Observations and document review Yes ☒ No ☐ Needs Improvement ☐
b. Contributing Factors Yes ☒ No ☐ Needs Improvement ☐
c. Recommendations to prevent recurrences when appropriate Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

The investigation files were reviewed for the four incidents report during calendar year 2016. The incident investigation for one incident, NRC Report Number 1158091, was not completed at the time of the evaluation visit. Outside testing of pressure control devices had not been completed by the operator's outside testing contractor.

One incident as noted in Question E.3 was completed by means other than an on-site investigation. A determination of no probable violation was determined when records documented that the operator complied with damage prevention requirements in 192.614.

The remaining two incidents were investigated on-site. The investigation observations and facts were documented on PHMSA's Form 11. The incident reports contained the conclusions of no probable violations found.

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

Evaluator Notes:

No probable violations were found as a result of the investigations.

- | | | | |
|---|--|---|---|
| 6 | Did the state assist region office by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

Evaluator Notes:

Contacted the PHMS Southern Region for input on GA PSC cooperation/assistance with incidents. GA PSC's performance has been satisfactory overall. They have responded to PHMSA's requests for updates in a timely manner. That includes responses to requests for follow ups on If I could make a recommendation to improve on the process, it'd be to have the PSC take initiative to notify PHMSA when an update becomes available to close the report in lieu of waiting until PHMSA makes a request for an update.status of repairs and/or other remedial action as prescribed in ODES reports.

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

Evaluator Notes:

Yes, the GAPSC shares incident investigation findings at the annual NAPSR Southern Region Meeting.

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

Evaluator Notes:

The GAPSC generally complied with Part E of this evaluation.

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



PART F - Damage Prevention

Points(MAX) Score

- | | | | |
|---|--|---|---|
| 1 | Has the state reviewed directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies? NTSB
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

GA PSC includes this question in their State and PSC Rules Inspection Form. Verified during file review that the question is being asked. No issues identified.

- | | | | |
|---|---|---|---|
| 2 | Did the state inspector check to assure the pipeline operator is following its written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system?
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

The GA PSC utilizes the PHMSA Form which covers the operators procedures for notifications, markings and one call system participation. Reviewed several inspection reports and assured the question is being addressed. No issues identified.

- | | | | |
|---|--|---|---|
| 3 | Did the state encourage and promote practices for reducing damages to all underground facilities to its regulated companies? (i.e. such as promoting/adopting the CGA Best Practices encouraging adoption of the 9 Elements, etc.)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

GA PSC has seminar every year and promote best practices for reducing underground damage prevention. GUFPA participates and perform Toolbox training for excavators to train on the one call and excavator laws.

- | | | | |
|---|--|---|---|
| 4 | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests? (This can include DIRT and other data shared and reviewed by the pipeline safety program)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, Georgia one-call and GUFPA collect data on total damages per 1000 locates. They compare with Performance Metrics data for accuracy.

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

Evaluator Notes:

The GA PSC is mainly complying with Section F of the Evaluation.

Total points scored for this section: 8
Total possible points for this section: 8

PART G - Field Inspections

Points(MAX) Score

- 1 Operator, Inspector, Location, Date and PHMSA Representative Info Only Info Only
Info Only = No Points

Name of Operator Inspected:

1. City of Pelham Gas Dept.; 2. Atlanta Gas and Light (AGL)

Name of State Inspector(s) Observed:

1. Daphne Jones (Lead), Lynn Buffington, and Jack Hewitt ; 2. Alan Towe, Jason Smith and David Lewis

Location of Inspection:

1. 380 Glauiser Street NE, Pelham, GA 31779; 2. Newnan, GA

Date of Inspection:

1. March 28-30, 2017; 2. April 3-7, 2016

Name of PHMSA Representative:

1. Clint Stephens; 2. Agustin Lopez

Evaluator Notes:

1. The Georgia State Program performed a Standard Inspection on a Gas Distribution System.

2. The GA PCS was evaluated while performing an inspection on AGL's Newnan Distribution and Transmission Unit. I observed Mr. Alan Towe (lead), Jason Smith and David Lewis conduct the team inspection.

- 2 Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? 1 1
Yes = 1 No = 0

Evaluator Notes:

1. Yes, the operator's representative was notified and present during the inspection.

2. Yes, the operator's representative was notified in advance to be present during the inspection.

- 3 Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

1. Yes, the inspector used the "Standard Inspection Report of A Gas Distribution Operator" checklist, dated 1/29/15. Checklist was used as a guide for the inspection.

2. Yes, the inspector used the PHMSA Forms to as a guide while conducting the inspection. They document any findings on the form.

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

Evaluator Notes:

1. Yes, the results of the inspection were thoroughly documented in their notes and the inspection form.

2. Yes, the inspector documented his results on the inspection form with detail.

- 5 Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps,pyrometer,soap spray,CGI,etc.) 1 1
Yes = 1 No = 0

Evaluator Notes:

1. Yes, maps, half cells, pipeline locator, and CGI were used during the inspection.

2. Yes, the operator had the proper equipment to conduct the observed tasks. The operator had an odorometer to conduct odor tests. The inspector also observed leak grading/verification during the field portion of the inspection. The technician had the appropriate equipment to conduct the leak testing (CGI, FI and bar hole)

6	Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) Yes = 2 No = 0 Needs Improvement = 1	2	2
a.	Procedures	<input checked="" type="checkbox"/>	
b.	Records	<input checked="" type="checkbox"/>	
c.	Field Activities	<input checked="" type="checkbox"/>	
d.	Other (please comment)	<input checked="" type="checkbox"/>	

Evaluator Notes:

1. The inspector reviewed the company O&M manual, emergency manual, and welding procedures. Records reviewed included previous violations, cathodic protection monitoring, leak survey reports, valve maintenance, odorant test, over-pressure protection, atmospheric corrosion, and operator qualification records. Field activities included pipeline locates, CP monitoring, regulator station inspected, possible leak checked, and rectifier inspection.
2. a. The inspectors reviewed the procedures during a previous headquarters inspections.
b. The inspectors reviewed records during the inspections which included, CP, valve inspections, odor tests, OPP inspections, pressure testing, and other operations and maintenance tasks required by the regulations.
c. Field activities observed were odor testing with an odorometer and leak grading/verification. The inspector reviewed the OQ procedures and verified the qualification of the technician performing the testing.

7	Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

1. Yes, the inspectors had adequate knowledge of pipeline safety program and regulations.
2. Yes, Alan Towe was very knowledgeable of the pipeline safety program and regulations.

8	Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) Yes = 1 No = 0	1	1
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Evaluator Notes:

1. Yes, the exit interview was performed with the presence of the Mayor of Pelham, Gas Company Superintendent, and Gas Company consultant.
2. Yes, a partial exit interview was conducted. Due to rain and bad weather during the week, the inspection was not completed. The inspection was going to be completed in the next couple of weeks.

9	During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable) Yes = 1 No = 0	1	1
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Evaluator Notes:

1. Yes, previous violations were discussed and those found during this inspection.
2. The inspector notified the operator of any issues that may be probable violations.

10	General Comments: 1) What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) 2) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) 3) Other. Info Only = No Points	Info Only	Info Only
a.	Abandonment	<input type="checkbox"/>	
b.	Abnormal Operations	<input checked="" type="checkbox"/>	
c.	Break-Out Tanks	<input type="checkbox"/>	
d.	Compressor or Pump Stations	<input type="checkbox"/>	
e.	Change in Class Location	<input type="checkbox"/>	

f.	Casings	<input type="checkbox"/>
g.	Cathodic Protection	<input checked="" type="checkbox"/>
h.	Cast-iron Replacement	<input type="checkbox"/>
i.	Damage Prevention	<input type="checkbox"/>
j.	Deactivation	<input checked="" type="checkbox"/>
k.	Emergency Procedures	<input type="checkbox"/>
l.	Inspection of Right-of-Way	<input checked="" type="checkbox"/>
m.	Line Markers	<input checked="" type="checkbox"/>
n.	Liaison with Public Officials	<input type="checkbox"/>
o.	Leak Surveys	<input checked="" type="checkbox"/>
p.	MOP	<input type="checkbox"/>
q.	MAOP	<input type="checkbox"/>
r.	Moving Pipe	<input type="checkbox"/>
s.	New Construction	<input type="checkbox"/>
t.	Navigable Waterway Crossings	<input type="checkbox"/>
u.	Odorization	<input checked="" type="checkbox"/>
v.	Overpressure Safety Devices	<input checked="" type="checkbox"/>
w.	Plastic Pipe Installation	<input type="checkbox"/>
x.	Public Education	<input type="checkbox"/>
y.	Purging	<input type="checkbox"/>
z.	Prevention of Accidental Ignition	<input type="checkbox"/>
A.	Repairs	<input type="checkbox"/>
B.	Signs	<input checked="" type="checkbox"/>
C.	Tapping	<input type="checkbox"/>
D.	Valve Maintenance	<input checked="" type="checkbox"/>
E.	Vault Maintenance	<input type="checkbox"/>
F.	Welding	<input type="checkbox"/>
G.	OQ - Operator Qualification	<input checked="" type="checkbox"/>
H.	Compliance Follow-up	<input checked="" type="checkbox"/>
I.	Atmospheric Corrosion	<input checked="" type="checkbox"/>
J.	Other	<input type="checkbox"/>

Evaluator Notes:

1. Those areas observed in the field were ROW accessibility, line locates, CP monitoring (rectifiers checked, abandoned services, critical valves checked, atmospheric corrosion, and marker signs.

2. Alan Towe observed a technician perform odor tests throughout the Newnan system and leak grading/repair verification. He asked the technicians to state any abnormal conditions (AOC) while performing the tasks.

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

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

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

Evaluator Notes:
Not an Interstate Agent.

- | | | | |
|----------|---|---|----|
| 2 | Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:
Not an Interstate Agent.

- | | | | |
|----------|--|---|----|
| 3 | Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:
Not an Interstate Agent.

- | | | | |
|----------|---|---|----|
| 4 | Were probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:
Not an Interstate Agent.

- | | | | |
|----------|---|---|----|
| 5 | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:
Not an Interstate Agent.

- | | | | |
|----------|--|---|----|
| 6 | Did the state give written notice to PHMSA within 60 days of all probable violations found?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:
Not an Interstate Agent.

- | | | | |
|----------|---|---|----|
| 7 | Did the state initially submit documentation to support compliance action by PHMSA on probable violations?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:
Not an Interstate Agent.

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

Evaluator Notes:
Not an Interstate Agent.

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

PART I - 60106 Agreement State (If Applicable)**Points(MAX) Score**

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

Evaluator Notes:

GA PSC does not have a 60106 Agreement.

- | | | | |
|----------|--|---|----|
| 2 | Are results documented demonstrating inspection units were reviewed in accordance with state inspection plan?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

GA PSC does not have a 60106 Agreement.

- | | | | |
|----------|--|---|----|
| 3 | Were any probable violations identified by state referred to PHMSA for compliance?
(NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

GA PSC does not have a 60106 Agreement.

- | | | | |
|----------|---|---|----|
| 4 | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

GA PSC does not have a 60106 Agreement.

- | | | | |
|----------|--|---|----|
| 5 | Did the state give written notice to PHMSA within 60 days of all probable violations found?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

GA PSC does not have a 60106 Agreement.

- | | | | |
|----------|--|---|----|
| 6 | Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

GA PSC does not have a 60106 Agreement.

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

Evaluator Notes:

GA PSC does not have a 60106 Agreement.

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