



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

1200 New Jersey Avenue SE
Washington DC 20590

2017 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)



2017 Gas State Program Evaluation -- CY 2017

Gas

State Agency: Georgia

Agency Status:

Date of Visit: 05/07/2018 - 05/11/2018

Agency Representative: Michelle Thebert, Director

Jeff Baggett, Supervisor

PHMSA Representative: Agustin Lopez, State Liaison

Rex Evans, Supervisor, State Programs

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

Name/Title: Lauren "Bubba" McDonald, Chairman

Agency: Georgia Public Service Commission

Address: 244 Washington Street, SW

City/State/Zip: Atlanta, Georgia 30334

Rating:

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

INSTRUCTIONS:

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2017 (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

Possible Points Points Scored

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)

10	10
13	12
48	46
15	11
11	10
8	8
12	12
0	0
0	0

TOTALS

117 109

State Rating 93.2

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:

Verified operator data in PDM and with their database. Track inspections in database to keep the number of inspections conducted yearly.

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

Evaluator Notes:

Verified total number of inspection days entered into Attachment 2 with their database. There was no issue with the number of inspection days submitted.

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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:

Verified operator and units with annual reports and compared with their database. The total number of operators was accurate when compared with database and PDM.

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

Compared the number of incident reports submitted to NRC in PDM with the number submitted in Attachment 4 and the number was accurate.

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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:

Verified compliance actions and there is no issues with the progress report numbers. There are open compliance actions dating back to 2008. Need improvement on closing out compliance actions specifically the older cases.

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

Evaluator Notes:

Yes, files are kept in their office. Reviewed files during evaluation and they were organized and accessible.

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

Compared inspector training with SABA completed training and it was accurate. All inspectors are qualified to perform standard inspections except one. There are several inspectors who are qualified to lead IMP and DIMP inspections.

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

Evaluator Notes:

The GPSC automatically adopts changes in regulations. All regulations have been adopted. Only one that is not the same is the amount of civil penalty.

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

Plan on conducting more construction activities due to up coming major construction projects. Major cases expected due to increase in damage prevention activities due to new fiber optics being installed.

10	General Comments: Info Only = No Points	Info OnlyInfo Only
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Evaluator Notes:

The GPSC is mainly complying with Part A of the Evaluation.

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



PART B - Program Inspection Procedures

Points(MAX) Score

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|---|--|---|---|
| 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 of procedures states the inspection process. Procedures gives guidance to the inspector on how to perform an inspection.

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|---|--|---|-----|
| 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 | 0.5 |
|---|--|---|-----|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Section IV of procedures explains the process for conducting an IMP and DIMP inspection.

In reviewing the GPSC Pipeline Safety Procedures there is a need for improving the detail of conducting Integrity Management Program (IMP) field verification and implementation inspections. The current IMP procedures do not give enough guidance on how and when to conduct IMP field verification and implementation inspections to verify the pipeline operator is performing these types of activities.

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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:

Section IV of procedures give guidance on performing OQ inspections.

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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:

Section IV #7 of Pipeline Safety Procedures gives guidance to inspectors.

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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:

Section IV has operator training procedures.

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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 | 0.5 |
|---|--|---|-----|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Section IV has construction procedures. The GPSC Pipeline Safety Procedures for Construction Inspections do not provide enough detail to give guidance to inspectors to conduct these types of inspections. The procedures should include pre and post inspection activities in order to guide an inspector on how to perform a construction inspection. Need to be more

detailed to give guidance to inspectors. Maybe include review GC1 forms that operator need to submit to PSC before construction commences. The number of construction days seem to low for the amount of growth in the Atlanta area.

7	Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? Yes = 6 No = 0 Needs Improvement = 1-5	6	6
a.	Length of time since last inspection (Within five year interval)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
b.	Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
c.	Type of activity being undertaken by operators (i.e. construction)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
d.	Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc)	Yes <input checked="" type="radio"/>	No <input 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 checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
f.	Are inspection units broken down appropriately?	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>

Evaluator Notes:

- Inspections are to be conducted every 60 months. LNG and propane every 24 months.
- Take into consideration history of operator.
- Type of activity is considered for inspection intervals.
- Location of operator is taken into consideration.
- Threats is taken into consideration.
- Inspection units are broken down by county.

8 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

B.2-Section IV of procedures explains the process for conducting an IMP and DIMP inspection.

In reviewing the GPSC Pipeline Safety Procedures there is a need for improving the detail of conducting Integrity Management Program (IMP) field verification and implementation inspections. The current IMP procedures do not give enough guidance on how and when to conduct IMP field verification and implementation inspections to verify the pipeline operator is performing these types of activities.

B.6-Section IV has construction procedures. The GPSC Pipeline Safety Procedures for Construction Inspections do not provide enough detail to give guidance to inspectors to conduct these types of inspections. The procedures should include pre and post inspection activities in order to guide an inspector on how to perform a construction inspection. Need to be more detailed to give guidance to inspectors. Maybe include review GC1 forms that operator need to submit to PSC before construction commences. The number of construction days seem to low for the amount of growth in the Atlanta area.

Total points scored for this section: 12
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):
858.50

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 8.33 = 1833.33

Ratio: A / B
858.50 / 1833.33 = 0.47

If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0
Points = 5

Evaluator Notes:

Reviewed total number of inspector days was verified. The GPSC met their inspection person-days to total person days ratio.

- 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:

no outside training.
only one inspector is not qualified to be lead on standard 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 very knowledgeable of the pipeline safety program and regulations.

- 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:

Letter was sent on June 20, 2017 and received response on August 20, 2018

- 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:

Yes, conduct safety seminar every year. TQ conducted seminar in 2018.

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

Evaluator Notes:

In reviewing the inspection reports there were several operators that had not been inspected within the sixty-month interval

for certain type of inspections. The GPSC needs to conduct each type of inspection at the interval established in their procedures.

Not meeting the 5 interval for some master meters. Open compliance sheet demonstrates that some master meters haven't been inspected since 2008. AGL Clayton District has no comprehensive in 5 years.

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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 |
|---|--|---|---|
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Evaluator Notes:

Yes, the GPSC utilizes the Federal form and has created a State Form that covers NTSB and ADB questions. Reviewed inspection reports to assure all applicable portions were completed. No issues were identified.

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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:

Yes, the only operator with cast iron is the City of Tallapoosa.

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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 |
|---|--|---|---|
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Evaluator Notes:

Yes, the only operator with cast iron is the City of Tallapoosa. The GPSC inspects the operator and reviews their procedures.

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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 |
|----|---|---|---|
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Evaluator Notes:

Yes, review operator emergency response procedures during inspection. GPSC has a state form with supplemental questions.

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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 |
|----|--|---|---|
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Evaluator Notes:

Yes, the GPSC reviews operator records of accidents to ensure appropriate response by operators is conducted. Operator is also required to submit report for third party damage incidents to GUFPA.

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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 |
|----|--|---|---|
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Evaluator Notes:

Yes, the GPSC reviews annual reports for accuracy and analyze to risk rank their inspections. Keep data of leaks from annual reports to check for trends.

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|----|--|---|---|
| 13 | Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission? | 1 | 1 |
|----|--|---|---|
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, question is asked during the inspections and verified by the GPSC.

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|--------------------------------------|---|---|---|
| 14 | 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, the GPSC conducts drug and alcohol inspections to assure the operator is in compliance. They conducted 16 days of drug and alcohol inspections in 2017.

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- | | | | |
|--------------------------------------|---|---|---|
| 15 | 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 GPSC has reviewed operator OQ Programs are up to date. Procedures state that programs will be inspected every 5 years. The GPSC also performs OQ Protocol 9 during inspections to assure operator personnel are qualified to perform tasks.

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- | | | | |
|--------------------------------------|---|---|---|
| 16 | 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? Are replies to Operator IM notifications addressed? (formerly part of Question C-13)). 49 CFR 192 Subpart 0 | 2 | 1 |
| Yes = 2 No = 0 Needs Improvement = 1 | | | |

Evaluator Notes:

During the records review it was found that the GPSC has not conducted field/implementation inspections of operator IMP field activities. The GPSC needs to conduct field/implementation inspection of operators IMP activities to monitor and assure proper remedial actions are being conducted. These might include dig visits, PIG runs, etc..

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|--------------------------------------|--|---|---|
| 17 | 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 | 2 | 2 |
| Yes = 2 No = 0 Needs Improvement = 1 | | | |

Evaluator Notes:

Yes, the GPSC conducts DIMP inspections to verify operators are in compliance. The GPSC needs to assure they contact the larger operator's on an annual basis to review their DIMP program for any changes or field digs being performed.

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| 18 | 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 be conducted every four years by operators. 49 CFR 192.616 | 2 | 2 |
| Yes = 2 No = 0 Needs Improvement = 1 | | | |

Evaluator Notes:

Yes, the GPSC reviews the operator's Public Awareness programs in accordance with their procedures. Also complete Public Awareness questions that are in the inspection forms.

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- | | | | |
|---------------------------------------|---|---|---|
| 19 | Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public). | 1 | 1 |
| Yes = 1 No = 0 Needs Improvement = .5 | | | |

Evaluator Notes:

The GPSC website has open records in which the public can view enforcement cases.

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

Evaluator Notes:

Did not have any SRCR in 2017.

- 21** 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? 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes the GPSC has form "State and PSC Rules Inspection Form" that has all the NTSB and advisory bulletin questions that are asked at every comprehensive inspection.

- 22** Did the state participate in/respond to surveys or information requests from NAPSAR or PHMSA? 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, Michelle Thebert responds to surveys requests from NAPSAR and PHMSA.

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

Evaluator Notes:

The GPSC has no open waivers. The last one was in 1993 involving Anahueser Busch which has been completed. The operator was added to their inspection schedule and Progress Report.

- 24** Did the state attend the National NAPSAR Board of Directors Meeting in CY being evaluated? 1 1
No = 0 Needs Improvement = .5 Yes = 1

Evaluator Notes:

Yes, Michelle Thebert attended the National meeting in 2017.

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

Evaluator Notes:

Excavation Damages per 1,000 tickets increased due to fiber optics being installed in the last several years. The GPSC has trained stakeholders on third party damage and on hand digging to limit the damages. There was a docket created to initiate program. Docket #40720. Issued order required training for hand digging.

- 26** Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT) Has the State updated SICT data? 1 1
No = 0 Yes = 1

Evaluator Notes:

Discussed the numbers entered into the SICT and there is no issue in meeting the inspector days. Discussed the need for construction days. There is no issue in meeting the inspector days.

- 27 Did the State verify Operators took appropriate action regarding Pipeline Flow Reversals, 1 1
Product Changes and Conversions to Service? See ADP-2014-04
Needs Improvement = .5 No = 0 Yes = 1

Evaluator Notes:

The GPSC added the question to their State Form to ask operators during the comprehensive inspections.

- 28 General Comments: Info OnlyInfo Only
Info Only = No Points

Evaluator Notes:

C.6-In reviewing the inspection reports there were several operators that had not been inspected within the sixty-month interval for certain type of inspections. The GPSC needs to conduct each type of inspection at the interval established in their procedures.

C.16-During the records review it was found that the GPSC has not conducted field/implementation inspections of operator IMP field activities. The GPSC needs to conduct field/implementation inspection of operators IMP activities to monitor and assure proper remedial actions are being conducted. These might include dig visits, PIG runs, etc..

Not meeting the 5 interval for some master meters. Open compliance sheet demonstrates that some master meters haven't been inspected since 2008. AGL Clayton District has no comprehensive in 5 years.

Total points scored for this section: 46
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 | 2 |
| 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:

Although the GPSC have procedures for taking steps from the discovery to resolution of a probable violation, there needs to be an improvement of the procedure due to recent breakdowns in the system. During the review of compliance files there seems to be a breakdown from the issuance to the resolution of probable violations. There are several instances in which it is taking months to a couple of years to resolve probable violations. The issue has been identified in previous evaluations so the need for amending the procedures is needed to avoid future breakdowns. Specifically, AGL and master meter cases seem to take a long time to get resolved.

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|----------|--|--------------------------------------|---|
| 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 | 2 |
| 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 type="radio"/> | No <input type="radio"/> Needs Improvement <input checked="" type="radio"/> |
| d. | Routinely review progress of probable violations | Yes <input type="radio"/> | No <input type="radio"/> Needs Improvement <input checked="" type="radio"/> |
| e. | Within 30 days, conduct a post-inspection briefing with the owner or operator of the gas or hazardous liquid pipeline facility inspected outlining any concerns; and | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| f. | Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

In reviewing the GPSC compliance files there seems to be an issue with the long period of time it takes to resolve and monitor the progress of probable violations. There are several inspections with probable violations that have been open dating back to 2008, specifically Master Meter operators. In addition, there are some cases that take months from the issuance of a probable violation to the operator response received. The IMP inspection of AGL in 2016 is an example in which it is still open and there has not been a resolution to the probable violations. There needs to be improvement in the timely manner to close or monitor probable violations. There was a two-point deduction from the evaluation score due to not resolving probable violations in a timely manner.

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

Evaluator Notes:

Yes, reviewed inspection records and it seems that the GPSC is issuing compliance actions for all probable violations discovered.

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

The GPSC gives due reasonable process to every operator.

- | | | | |
|----------|---|---|---|
| 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, Michelle Thebert is familiar with the process for imposing civil penalties. There were several civil penalties issued in 2017.

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

Evaluator Notes:

Yes, the GPSC issued several civil penalties in the past years and in 2017. There were no civil penalties collected in 2017.

7	General Comments:	Info Only
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Info Only = No Points

Info Only

Evaluator Notes:

D.1-Although the GPSC have procedures for taking steps from the discovery to resolution of a probable violation, there needs to be an improvement of the procedure due to recent breakdowns in the system. During the review of compliance files there seems to be a breakdown from the issuance to the resolution of probable violations. There are several instances in which it is taking months to a couple of years to resolve probable violations. The issue has been identified in previous evaluations so the need for amending the procedures is needed to avoid future breakdowns. Specifically, AGL and master meter cases seem to take a long time to get resolved.

D.2-In reviewing the GPSC compliance files there seems to be an issue with the long period of time it takes to resolve and monitor the progress of probable violations. There are several inspections with probable violations that have been open dating back to 2008, specifically Master Meter operators. In addition, there are some cases that take months from the issuance of a probable violation to the operator response received. The IMP inspection of AGL in 2016 is an example in which it is still open and there has not been a resolution to the probable violations. There needs to be improvement in the timely manner to close or monitor probable violations. There was a two-point deduction from the evaluation score due to not resolving probable violations in a timely manner.

Total points scored for this section: 11
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 IIIV has Incident investigation procedures. All inspectors are on call and each is responsible for receiving calls from operators. List of inspectors are provided to the operators.

- 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:

Yes, the GPSC has mechanism to receive incident reports from operators. Each operator is given the inspectors contact phone numbers and all inspectors are on-call to receive notifications.

- a. Yes, the GPSC is aware of the MOU between NTSB and cooperation with PHMSA
b. Yes the GPSC is aware of the federal/state cooperation in case of an incident.

- 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:

All reportable incidents were investigated but no onsite was made on a couple. GPSC will amend procedure to include if an onsite investigation was not made and that enough information is obtained to make the decision.

- 4 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? 3 2
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:

- a. Incident investigation report has details of incident and documents reviewed.
b. Contributing factors are mentioned in the investigation reports.
c. There is a lack of recommendations to prevent recurrence. GPSC did not give recommendation to incident that occurred on 12/21/2017 (AGL) they only issued a Letter of Concern. This is the 2nd type of incident that involves posi-grip couplings. They demonstrate that they are enforcing the regulations during accident investigation but do need to improve on the severity of the compliance actions. For example on the AGL 12/21/2017 incident. Similar incident occurred in 2016 in which AGL sent letter stating they identified 450 couplings and will replace all by 2022. No correspondence was sent to AGL to either confirm with replacement program. JL17-001

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

Evaluator Notes:

Yes, issued NOPV, CP and Letter of Concern to operators involved in incidents.

- 6 Did the 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? (validate report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, the GPSC interacts with the AID members to validate follow up actions.

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

Evaluator Notes:

Yes, Michelle Thebert presented at the NAPS meeting during the State of The State report and shared lessons learned.

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

Evaluator Notes:

E.4-There is a lack of recommendations to prevent recurrence. GPSC did not give recommendation to incident that occurred on 12/21/2017 (AGL) they only issued a Letter of Concern. This is the 2nd type of incident that involves posi-grip couplings. They demonstrate that they are enforcing the regulations during accident investigation but do need to improve on the severity of the compliance actions. For example on the AGL 12/21/2017 incident. Similar incident occurred in 2016 in which AGL sent letter stating they identified 450 couplings and will replace all by 2022. No correspondence was sent to AGL to either confirm with replacement program. JL17-001

Total points scored for this section: 10
Total possible points for this section: 11



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:

Yes, the GPSC has additional State form that includes directional drilling/boring procedures review.

- | | | | |
|---|--|---|---|
| 2 | Did the state inspector verify pipeline operators are following their 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:

Review Damage prevention procedures during the Comprehensive inspections. Verify the operators one call system.

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

Conduct Seminar every year to operators. Work hand in hand with GUFPA to encourage and promote practices. Commissioner also introduced a docket to educate excavators on hand digging.

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

GUFPA collects data on the number of pipeline damages per 1,000 locate request. The rate is about 1% base on the data collected by 811 and GUFPA.

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

Evaluator Notes:

The GPSC is mainly complying with Part 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 Lawrenceville 2. City of Toccoa Natural Gas System

Name of State Inspector(s) Observed:

1. Lynn Buffington 2. Alan Towe

Location of Inspection:

1. Lawrenceville, GA 2. Toccoa, GA

Date of Inspection:

1. March 26-30, 2018 2. June 12-13, 2018

Name of PHMSA Representative:

1. Agustin Lopez 2. Don Martin

Evaluator Notes:

There were two field inspection Evaluations performed:

1. Evaluated Mr. Lynn Buffington conduct a distribution inspection of the City of Lawrenceville distribution system. He reviewed procedures, records and field inspection. This was a team inspection and Mr. Buffington was looking at valve maintenance for this week.
2. Evaluated Mr. Towe conducting a follow-up inspection of Probable Violations corrections from a previous 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 was notified with enough time and given the opportunity to have any representative present.
2. Yes, the Utility Director and Superintendent were provided notification on May 17, 2018. Anthony Adams, Superintendent and Rocky Bowen, Assistant Superintendent, were 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 was a form to guide him during the inspection and to document his results.
2. Yes, the inspector utilized a form to guide through the follow-up questions.

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

Evaluator Notes:

1. Yes, the inspector documented his results on the inspection form.
2. Yes, the operator responses were documented on the form.

- 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, the inspector verified the technicians had their equipment to operate valves. He also had them put up signs on the pipeline facilities when he found missing signs.
2. Testing equipment was not required during the inspection.

- 6 Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) 2 2
Yes = 2 No = 0 Needs Improvement = 1
a. Procedures ☒

- | | | |
|----|------------------------|-------------------------------------|
| b. | Records | <input checked="" type="checkbox"/> |
| c. | Field Activities | <input checked="" type="checkbox"/> |
| d. | Other (please comment) | <input type="checkbox"/> |

Evaluator Notes:

1. Yes, Mr. Buffington reviewed certain procedures which dealt with his portion of the inspection. He also reviewed valve inspection records and concluded with a field inspection of the valve sites.
2. Yes, as appropriate for a follow-up inspection.

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

Evaluator Notes:

1. Yes, Mr. Buffington has been with the GA PSC for a long time and is very knowledgeable of the pipeline safety program and regulations.
2. Yes, Allan Towe has been with the GA PSC for 28 years and completed all necessary training. He exhibited excellent knowledge of pipeline safety regulations and the program.

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

Evaluator Notes:

1. Yes, at the end of the inspection, the GA PSC conducted an exit briefing with the operator to discuss any findings and issues.
2. Yes, an exit interview was conducted to discuss whether or not the correction actions were acceptable. One was not acceptable and would require further action by the operator to close the inspection.

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

Evaluator Notes:

1. Yes, there were several issues brought up by the GA PSC. Mr. Buffington had an issue with a buried emergency valve that was not accessible and an alternative valve had not been assigned. He also had an issue with the phone numbers on the signs and not routing to the appropriate personnel. The operator stated that it was due to the phone lines being down and would work on having a back up.
2. Yes, information was provided on violations that were still outstanding on the regulator stations. Pit depth determination is needed at locations determined to have local and general corrosion. Some regulator stations will need emergency valves installed at a safe distance from the stations. Relief valve capacity calculations will need to be conducted. Locks upstream of relief valves will need to be installed at some locations. Signs with information preventing accidental ignition need to be installed.

- | | | | |
|----|---|-----------|-----------|
| 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 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 type="checkbox"/> |
| h. | Cast-iron Replacement | <input type="checkbox"/> |
| i. | Damage Prevention | <input type="checkbox"/> |
| j. | Deactivation | <input 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 type="checkbox"/>
p.	MOP	<input type="checkbox"/>
q.	MAOP	<input checked="" type="checkbox"/>
r.	Moving Pipe	<input type="checkbox"/>
s.	New Construction	<input type="checkbox"/>
t.	Navigable Waterway Crossings	<input type="checkbox"/>
u.	Odorization	<input 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 checked="" type="checkbox"/>
A.	Repairs	<input checked="" 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 type="checkbox"/>
H.	Compliance Follow-up	<input type="checkbox"/>
I.	Atmospheric Corrosion	<input type="checkbox"/>
J.	Other	<input type="checkbox"/>

Evaluator Notes:

1. Mr. Lynn Buffington inspected the valve maintenance part of the inspection. During the field he inspected condition of valves, operated valves, checked ROW condition and checked for signs/line markers. He performed an excellent job and conducted himself very professionally.
2. Alan Towe discussed the details of the probable violations from the previous inspections, the operator's response, the details of the corrective actions stated by the operator and the acceptability of the corrective actions.

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:

GPSC is 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:

GPSC is 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:

GPSC is 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:

GPSC is 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:

GPSC is 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:

GPSC is 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:

GPSC is not an interstate agent.

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

Evaluator Notes:

GPSC is 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:

GPSC 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:

GPSC 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:

GPSC 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:

GPSC 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:

GPSC 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:

GPSC does not have a 60106 Agreement.

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

Evaluator Notes:

GPSC does not have a 60106 Agreement.

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