



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

1200 New Jersey Avenue SE  
Washington DC 20590

## 2013 Natural 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)

2013 Natural Gas State Program Evaluation -- CY 2013  
Natural Gas

**State Agency:** Georgia

**Agency Status:**

**Date of Visit:** 06/09/2014 - 06/13/2014

**Agency Representative:** Michelle Thebert, Director, Facilities Protection Unit  
Jeff Baggett, Supervisor, Facilities Protection Unit  
Chris Swann, Assistant to the Director, Training and Special Projects

**PHMSA Representative:** Glynn Blanton, US DOT/PHMSA State Programs

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

**Name/Title:** Chuck Eaton, 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:** Yes

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**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 2013 (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.

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**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**

<b>PARTS</b>	<b>Possible Points</b>	<b>Points Scored</b>
A Progress Report and Program Documentation Review	10	9.5
B Program Inspection Procedures	15	15
C Program Performance	45	44
D Compliance Activities	15	15
E Incident Investigations	9	9
F Damage Prevention	8	8
G Field Inspections	12	12
H Interstate Agent State (If Applicable)	0	0
I 60106 Agreement State (If Applicable)	0	0
<b>TOTALS</b>	<b>114</b>	<b>112.5</b>
<b>State Rating</b> .....		<b>98.7</b>

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## PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- |          |   |   |     |
|----------|---|---|-----|
| <b>1</b> | Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1 (A1a)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 0.5 |
|----------|---|---|-----|

**Evaluator Notes:**

A review of Attachment 1 found improvement was noted on entering the correct code category for Distribution-Other, Gathering Lines and Offshore. However, a review of office records pertaining to data on inspection units and number of operators to be recorded in Attachment 1 found the correct number of LPG operators was not recorded correctly. The previous year information for LPG operators was entered without verifying the correct number. The correct number of LPG operators is seven. Therefore, a loss of half a point occurred.

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | Review of Inspection Days for accuracy - Progress Report Attachment 2 (A1b)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

A review of Attachment 2 indicated all information was correct. No issues.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3 (A1c)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

A review and comparison of Attachment 3, List of Operators, to GPSC Pipeline Safety database found the list to be correct. No issues.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4 (A1d)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

Yes, a review of Attachment 4 found three incidents were reported in CY2013. Reviews of incident reports in the Pipeline Data Mart found the property amounts and cause code were entered correctly. No loss of points occurred.

- |          |  |   |   |
|----------|--|---|---|
| <b>5</b> | Accuracy verification of Compliance Activities - Progress Report Attachment 5 (A1e)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

A review of Attachment 5, Stats on Compliance Actions, found the number of compliance actions, violations found and corrected were reported correctly. The number of compliance action consisted of 123 notice of probable violations and 17 warning letters. No areas of concern.

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Were pipeline program files well-organized and accessible? - Progress Report Attachment 6 (A1f, A4)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

**Evaluator Notes:**

Yes, conducted a review of file folders and database. We randomly selected letters and compliance forms with the following operators: City of Statesboro, Dalton Utilities and City of Austell Natural Gas System and found information matched the electronic copies. Excellent file folders and documentation of inspection reports.

- |          |  |   |   |
|----------|--|---|---|
| <b>7</b> | Was employee listing and completed training accurate and complete? - Progress Report Attachment 7 (A1g)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

Yes, a detailed review of employees listed on Attachment 7 was conducted and compared to the SABA training transcript. No issues of concern.

<b>8</b>	Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8 (A1h) Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

No issues. GPSC will continue to take action to increase the maximum penalty amounts for violations of the pipeline safety standards to match the federal level.

<b>9</b>	List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10 (H1-3) Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

Good description of the planned and past performance was provided. No issues.

<b>10</b>	General Comments: Info Only = No Points	Info Only	Info Only
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Evaluator Notes:

A loss of half a point occurred in this section of Part A.

Question A.1: A review of office records pertaining to data on inspection units and number of operators to be recorded in Attachment 1 found the correct number of LPG operators was not recorded correctly. The previous year information for LPG operators was entered without verifying the correct number. The correct number of LPG operators is seven. Therefore, a loss of half a point occurred.

Total points scored for this section: 9.5  
Total possible points for this section: 10

## PART B - Program Inspection Procedures

Points(MAX) Score

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Standard Inspections (B1a)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

Yes, Georgia Public Service Commission (GPSC) Facilities Protection Pipeline Safety Inspection Program Manual indicated this item is located under Section III. Procedures for Determining Inspection Priorities. No issues.

- |          |   |   |   |
|----------|---|---|---|
| <b>2</b> | IMP Inspections (including DIMP) (B1b)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Yes, GPSC Pipeline Safety Inspection Program Manual pages 6 & 9 address this procedure on IMP and DIMP inspections. The procedures identify frequencies of inspections which are once each 60 months. No issues.

- |          |   |   |   |
|----------|---|---|---|
| <b>3</b> | OQ Inspections (B1c)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Yes, GPSC Pipeline Safety Inspection Program Manual page 11 addresses this procedure on OQ inspections. The procedures identify frequencies of inspections which are once each 60 months. No issues.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Damage Prevention Inspections (B1d)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Yes, GPSC Pipeline Safety Inspection Program Manual page 9 addresses this procedure on Damage Prevention Inspections. The procedure identifies the frequency of the inspection which is once each 60 months. No areas of concern.

- |          |  |   |   |
|----------|--|---|---|
| <b>5</b> | On-Site Operator Training (B1e)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Yes, GPSC Pipeline Safety Inspection Program Manual page 8 addresses this procedure on On-Site Operator Training Inspections. The procedure identifies the frequency of the inspection which is as the need arises or requested by the operator.

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Construction Inspections (B1f)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Yes, GPSC Pipeline Safety Inspection Program Manual page 8 addresses this procedure on Construction Inspections. The procedure identifies the frequency of the inspection which is as the need arises.

- |          |  |   |   |
|----------|--|---|---|
| <b>7</b> | Incident/Accident Investigations (B1g)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

Yes, GPSC Pipeline Safety Inspection Program Manual page 9 addresses this procedure on Accident Investigations. No areas of concern.

- |          |   |   |   |
|----------|---|---|---|
| <b>8</b> | Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? (B2a-d, G1,2,4)<br>Yes = 6 No = 0 Needs Improvement = 1-5 | 6 | 6 |
|----------|---|---|---|

- |    |  |                                      |                          |   |
|----|--|--------------------------------------|--------------------------|---|
| a. | Length of time since last inspection   | 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 ☒ No ☐ Needs Improvement ☐

f. Are inspection units broken down appropriately?

Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

Yes, GPSC Pipeline Safety Inspection Program Manual addresses each of these items under Section III. Procedures for Determining Inspection Priorities.

a. See Compliance History section of manual.

b. See Item 6 page 5.

c. See Item 7, page 5.

d. All counties that have natural gas service are identified as an inspection unit.

e. They review excavation damage, corrosion and other factors to meet this requirement.

f. Yes

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9 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section. GPSC has generally met the requirements of Part B.

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

**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 (A12) 5 5  
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):  
997.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
220 X 10.00 = 2200.00

Ratio: A / B  
997.00 / 2200.00 = 0.45

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

**Evaluator Notes:**

A.Total Inspection Person Days (Attachment 2)= 997

B.Total Inspection Person Days Charged to the program(220\*Number of Inspection person years(Attachment 7)=2200

Formula:- Ratio = A/B = 997/2200 = 0.45

Rule:- (If Ratio  $\geq$ .38 then points = 5 else Points = 0.)

Thus Points = 5

- 2** Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines for requirements) Chapter 4.4 (A8-A11, G19) 5 5  
Yes = 5 No = 0 Needs Improvement = 1-4

- |    |  |                                      |                          |   |
|----|--|--------------------------------------|--------------------------|---|
| 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"/> |

**Evaluator Notes:**

a. All required base training courses have been completed by the pipeline safety staff members.

b. All individual employees have completed the DIMP training course PL1245 except for Daphne Jones and David Lewis. Both of these individuals are wait listed to attend the course in CY2014.

c. Five individuals have completed the root cause training course.

d. NDT/NACE CP-2 course.

- 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 (A5) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

**Evaluator Notes:**

Yes, Michelle Thebert has successfully completed the PL1250 course and has been with the Georgia Public Service Commission since 1996. She is scheduled to complete all pipeline safety training courses within five years or by January 31, 2019.

- 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 (A6-7) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

**Evaluator Notes:**

Yes, PHMSA State Program letter to GPSC Chairman Chuck Eaton dated June 28, 2013 required a response to Zach Barrett, Director PHMSA State Programs. The response letter was received on August 20, 2013 and within the required 60 day time schedule. No issues of concern.

- 5** Did State hold PHMSA TQ Seminar in Past 3 Years? Chapter 8.5 (A3) 2 2

Yes = 2 No = 0

Evaluator Notes:

Yes, on April 7-10, 2014 GPSC with the assistance of the Georgia Municipal Association held a pipeline safety seminar in Macon, Georgia. Two hundred seventy-four attendances representing the natural gas operators attended the seminar.

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- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1 (B3) | 5 | 5 |
|----------|---|---|---|

Yes = 5 No = 0 Needs Improvement = 1-4

Evaluator Notes:

Yes, a review of inspection records which included the electronic data base of reports confirm all types of operators and inspection units were performed in accordance with their pipeline safety plan. No issues.

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- |          |   |   |   |
|----------|---|---|---|
| <b>7</b> | Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1 (B4-5) | 2 | 2 |
|----------|---|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, a review of 2013 inspection reports for City of Monroe 9/16/13, City of Woodland 8/5/13, City of Cartersville Gas Department 4/30/13 & City of Hawkinsville 8/19/13 indicated all code requirements were completed on the Federal forms.

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- |          |  |   |   |
|----------|--|---|---|
| <b>8</b> | 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 (B7) | 1 | 1 |
|----------|--|---|---|

Yes = 1 No = 0

Evaluator Notes:

Yes, this item is on gas distribution standard inspection form. GPSC has a Commission order that requires each operator to examine cast iron mains that have been exposed. If graphitization is found the pipeline must be replaced. Currently, 5 miles of cast iron remain in Georgia. City of Tallapoosa has the 5 miles and it is anticipated all cast iron will be replaced by 2015.

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- |          |   |   |   |
|----------|---|---|---|
| <b>9</b> | 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 (B8) | 1 | 1 |
|----------|---|---|---|

Yes = 1 No = 0

Evaluator Notes:

Yes, this is listed and checked on the federal gas distribution standard inspection form.

- 
- |           |  |   |   |
|-----------|--|---|---|
| <b>10</b> | 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 (B9) | 1 | 1 |
|-----------|--|---|---|

Yes = 1 No = 0

Evaluator Notes:

Yes, this is listed and checked on the federal gas distribution standard inspection form.

- 
- |           |   |   |   |
|-----------|---|---|---|
| <b>11</b> | 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 (B10,E5) | 1 | 1 |
|-----------|---|---|---|

Yes = 1 No = 0

Evaluator Notes:

Yes, GPSC Rule 515-9-4-.05 requires the facility owners and operators to report third party damages to the GUFPA section. GPSC reviews this reporting information along with accidents data to ensure the operator is complying with section 192.617.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>12</b> | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues? Data Initiative (G6-9,G16) | 2 | 2 |
|-----------|---|---|---|



Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, GPSC reviews the annual reports during standard inspection and when the operator filed the report. In developing their risk ranking model for inspections, they access the data mart files and check the annual reports for trends. No issues.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>13</b> | Did state input all applicable OQ, IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1 (G10-12) | 2 | 1 |
|-----------|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

No. A review of PHMSA Operator Qualification Database on June 5, 2014, indicated thirteen OQ inspections performed in CY2013 were not uploaded in to the data base. However, a check of the IMP data base found the CY2013 IMP inspection reports (8) performed by GPSC inspectors have been uploaded. Improvement is needed in submitting and uploading OQ reports into the data base. A loss of one point occurred.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>14</b> | Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission? (G14) | 1 | 1 |
|-----------|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, this is reviewed against the operator's Operations and Maintenance Procedures, IMP inspection and often the inspector will call and verify by email. This item is described in GPSC procedures manual section 3.2.f. No issues

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- |           |  |   |   |
|-----------|--|---|---|
| <b>15</b> | 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 (I1-3) | 2 | 2 |
|-----------|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, this is reviewed during the drug and alcohol inspection and described in GPSC Procedures Manual.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>16</b> | 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 (I4-7) | 2 | 2 |
|-----------|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, this is reviewed during a review of the operator's O&M Plan and inspection. GPSC inspectors use PHMSA Form 13.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>17</b> | 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). 49 CFR 192 Subpart O (I8-12) | 2 | 2 |
|-----------|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, a review of PHMSA Gas Transmission Integrity Management website showed eight entries or inspections was performed. During the inspection GPSC staff members check the IMP program and all updates. No issues.

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- |           |   |   |   |
|-----------|---|---|---|
| <b>18</b> | 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). 49 CFR 192 Subpart P<br>DIMP ? First round of program inspections should be complete by December 2014 | 2 | 2 |
|-----------|---|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, all GPSC staff members are conducting DIMP inspections. A review of files and database found sixty-seven reports have been completed. GPSC is on target to complete all DIMP inspections by September, 2014.

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. 49 CFR 192.616 (I13-16) PAPEI Effectiveness Inspections should be complete by December 2013	2	2
Yes = 2 No = 0 Needs Improvement = 1			
Evaluator Notes: Yes, a review of GPSC database and files found one hundred thirty-three inspections were conducted. All operators were inspected before December, 2013.			
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). (G20-21)	1	1
Yes = 1 No = 0 Needs Improvement = .5			
Evaluator Notes: GPSC docket system is a mechanism used to communicate with all stakeholders. All operators have been assigned a docket number and all inspections reports can be viewed on line at <a href="http://fp.psc.state.ga.us/pipelinesafety/default.aspx">http://fp.psc.state.ga.us/pipelinesafety/default.aspx</a>			
21	Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 (B6)	1	NA
Yes = 1 No = 0 Needs Improvement = .5			
Evaluator Notes: A review of Pipeline Data Mart found no safety related condition reports were filed in CY2013. N/A			
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? (G13)	1	1
Yes = 1 No = 0 Needs Improvement = .5			
Evaluator Notes: Yes. This issue is addressed as a stand-alone question on the GPSC Facilities Protection Unit inspection form. No issues.			
23	Did the state participate in/respond to surveys or information requests from NAPSIR or PHMSA? (H4)	1	1
Yes = 1 No = 0 Needs Improvement = .5			
Evaluator Notes: Yes, GPSC Facilities Protection Director has responded to all NAPSIR/NARUC and PHMSA request. No issues.			
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.	Info Only	Info Only
Info Only = No Points			
Evaluator Notes: No waivers or special permits were issued in CY2013.			
25	General Comments:	Info Only	Info Only
Info Only = No Points			
Evaluator Notes: Loss of one point occurred in Section C. Question C.13. A review of PHMSA Operator Qualification Database on June 5, 2014, indicated thirteen OQ inspections performed in CY2013 were not uploaded into the data base. Improvement is needed in submitting and uploading OQ reports into the data base. A loss of one point occurred.			

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Total points scored for this section: 44  
Total possible points for this section: 45

**PART D - Compliance Activities****Points(MAX) Score**

- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1 (B12-14, B16, B1h)<br>Yes = 4 No = 0 Needs Improvement = 1-3 | 4   | 4                                       |
| 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 checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

**Evaluator Notes:**

- a. Yes, this is listed in the GPSC Pipeline Safety Procedures Manual page 12, which states, "In accordance with the requirements of Commission Rule 515-9-3-.07, upon completion of an inspection, all probable violations shall be communicated verbally to the operator during the exit interview. The inspector shall attempt to conduct the exit interview with the appropriate company officer for private operators, or the manager/board member of a municipal gas operator. If these individuals are not available, the exit interview may be conducted with an appropriate company official; e.g. Service Center Supervisor, Gas Superintendent, Utility Director.
- b. Procedures for reviewing progress of compliance is accomplished via their docket reporting system and by the Director/Supervisor. This review process is listed in the Procedures Manual.

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | 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 (B11,B18,B19)<br>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.       | Were probable violations documented?   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c.       | Were probable violations resolved?   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d.       | Was the progress of probable violations routinely reviewed?  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

**Evaluator Notes:**

- a. Yes, this is listed in the Pipeline Safety Procedures Manual on page 13 under section VI. Preparation of Inspection Reports.
- b. Yes, a review of files and database confirm all probable violations were documented.
- c. Yes, probable violations were resolved as noted in the file folders and checked against the progress report filed with PHMSA.
- d. Yes, probable violations were routinely reviewed by Director/Supervisor. This was accomplished using the docket filing system and data base.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | Did the state issue compliance actions for all probable violations discovered? (B15)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

**Evaluator Notes:**

Yes, a review of 2013 inspection reports that contained a violation(s) cited indicated the operator was given due process to correct the violation or request a hearing. In 2013, no show cause hearings were requested by the operators. However, 17 warning letters and 123 notice of probable violations were issued resulting in a total of \$2,110,000 in civil penalties assessed.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary. (B17, B20)<br>Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

**Evaluator Notes:**

Yes, compliance action is described in GPSC Pipeline Safety Procedures Manual and commission rules. No issues.

- |          |   |   |   |
|----------|---|---|---|
| <b>5</b> | 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) (B27)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

**Evaluator Notes:**

Yes, Michelle Thebert is familiar with imposing civil penalties and compliance orders. In this regard, the total number of dollars assessed against operators for non-compliance in CY 2013 was \$2,110,000. No issues.

---

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

Evaluator Notes:

Yes, the total number of dollars assessed against operators for non-compliance in CY 2013 was \$2,110,000. No issues.

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

Evaluator Notes:

No loss of points occurred in this section. GPSC has generally met the requirements of Part D.

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

## PART E - Incident Investigations

Points(MAX) Score

- |          |   |                                      |  |
|----------|---|--------------------------------------|--|
| <b>1</b> | 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 (A2,D1-3)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2                                    | 2  |
| a.       | Acknowledgement of MOU between NTSB and PHMSA (Appendix D)  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b.       | Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E)  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

**Evaluator Notes:**

Yes, this is described in section VII Procedures for Receiving Reporting of Incidents of the Pipeline Safety of GPSC Inspection Program Procedure manual. A review of files found the agency maintains adequate records of incidents in their data base and file folder by operator. No issues.

**A & B:**

A discussion with Michelle Thebert, Director, Facilities Protection Unit, confirms she has an understanding about the MOU between NTSB and PHMSA and the Federal/State Cooperation agreement. No issues.

- |          |   |   |   |
|----------|---|---|---|
| <b>2</b> | 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 (D4)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

**Evaluator Notes:**

Yes. No issues.

- |          |  |                                      |  |
|----------|--|--------------------------------------|--|
| <b>3</b> | Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? (D5)<br>Yes = 3 No = 0 Needs Improvement = 1-2 | 3                                    | 3  |
| a.       | Observations and document review   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b.       | Contributing Factors   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| c.       | Recommendations to prevent recurrences when appropriate  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

**Evaluator Notes:**

Yes, a review of two incident reports pertaining to Atlanta Gas Light Company that occurred in Lawrenceville Hwy and Hwy 280 confirm a thorough investigation was performed. Additionally, a review of the incident report pertaining to the incident that occurred on City of Greensboro Municipal Gas System at GA Hwy 12 was thoroughly investigated. No issues.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Did the state initiate compliance action for violations found during any incident/accident investigation? (D6)<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

Yes, GPSC did take action against City of Greensboro Municipal Gas System and issued two violations and a civil penalty in the amount of \$220,000. The case is under a consent agreement between the Commission and operator.

- |          |  |   |   |
|----------|--|---|---|
| <b>5</b> | 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 (D7)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

**Evaluator Notes:**

Yes, Chris Taylor, PHMSA Southern Region, and Jeff Baggett, GPSC have been assisting each office in follow-up action related to operator incident reports. No issue.

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Does state share lessons learned from incidents/accidents? (sharing information, such as: at NAPS Region meetings, state seminars, etc) (G15)<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Yes, information on incidents and accident investigations was shared by Michelle Thebert at the NAPSR Southern Region meeting in Panama City, Florida in April 28, 2014.

---

7 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

No loss of points occurred in this section. GPSC has generally met the requirements of Part E.

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Total points scored for this section: 9  
Total possible points for this section: 9

## 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 (E1)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Yes, this item is listed on the Inspection Check list. A description of this item is provided in the Procedure Manual under Inspection Procedures, Construction. No issues.

- |   |  |   |   |
|---|--|---|---|
| 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? (E2)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes. GPSC inspectors review this item during the standard and damage investigation inspections. Georgia state law and GPSC rules require all operators to be a member of the State Utility Protection Center and investigate third-party damages to their facilities and determine if a violation(s) has occurred by reporting the information to the One Call Center.

- |   |   |   |   |
|---|---|---|---|
| 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.) (E3)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Yes, GPSC adopted the Common Ground Alliance Best Practices under Rule 515-9-6-.01.

- |   |  |   |   |
|---|--|---|---|
| 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) (E4,G5)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, GUFPA continues to collect and review information on damages per 1,000 locate requests. This data is used by GPSC in risk ranking of operators to be inspected.

- |   |  |  |                    |
|---|--|--|--------------------|
| 5 | General Comments:<br>Info Only = No Points |  | Info OnlyInfo Only |
|---|--|--|--------------------|

Evaluator Notes:

No loss of points occurred in this section. GPSC has generally met the requirements of Part F.

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:

Atlanta Gas Light Company

Name of State Inspector(s) Observed:

Lynn Buffington, Inspector & David Lewis, Inspector

Location of Inspection:

Savannah, Georgia

Date of Inspection:

June 9-10, 2014

Name of PHMSA Representative:

Glynn Blanton, PHMSA State Programs

Evaluator Notes:

This was a corrosion control inspection on AGL facilities located in Savannah, GA. The following representatives from AGL were present: John Hudson, Corrosion Tech I and Ralph Kearney, Corrosion Tech II. The review of corrosion control records was performed the first day of the inspection. The second day was spent performing pipe to soil potential readings on several different anode and rectified systems located in Chatham, Bryan, Effingham and Liberty counties.

- 2 Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? (F2) 1 1  
Yes = 1 No = 0

Evaluator Notes:

Yes, Lynn Buffington with Georgia Public Service Commission contacted Charlie Waters, Savannah Supervisor, on June 1, 2014

- 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) (F3) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, the inspector used Standard Inspection PHMSA Form 2 to record a review of records and reading taken at different locations on AGL distribution system.

- 4 Did the inspector thoroughly document results of the inspection? (F4) 2 2  
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, observed the inspector recording readings and information about the operator's compliance with corrosion control and their cathodic protection system on PHMSA form 2.

- 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.) (F5) 1 1  
Yes = 1 No = 0

Evaluator Notes:

Yes, observed inspector checking the operator's rectifier, pipe to soil potential meters and current interrupter before being used to conduct the corrosion control reviews.

- 6 Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) (F7) 2 2  
Yes = 2 No = 0 Needs Improvement = 1
- |    |                        |                                     |
|----|------------------------|-------------------------------------|
| a. | Procedures             | <input checked="" type="checkbox"/> |
| b. | Records                | <input checked="" type="checkbox"/> |
| c. | Field Activities       | <input checked="" type="checkbox"/> |
| d. | Other (please comment) | <input type="checkbox"/>            |

Evaluator Notes:

Yes, a very thorough review was performed by the inspectors on AGL's written procedures, corrosion control records, and pipe to soil reading taken during the field portion of the inspection.

- |          |  |   |   |
|----------|--|---|---|
| <b>7</b> | Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) (F8)<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

Yes both inspectors have over ten years of experience and have completed all the required base natural gas safety training courses at TQ.

- |          |  |   |   |
|----------|--|---|---|
| <b>8</b> | 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) (F9)<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Yes, on June 10th, an exit interview was conducted with AGL representatives Charlie Water, John Hudson and Ralph Kearney to discuss the notice of probable violation found during the inspection.

- |          |   |   |   |
|----------|---|---|---|
| <b>9</b> | During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable) (F10)<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Yes, one notice of probable violation was found and cited against the operator pertaining to low readings on the anode system located Guyton, Georgia along Hwy 119.

- |           |  |           |           |
|-----------|--|-----------|-----------|
| <b>10</b> | General Comments: What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) Other.<br>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 checked="" 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 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 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 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 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 checked="" type="checkbox"/> |
| J. | Other                             | <input type="checkbox"/>            |

Evaluator Notes:

Pipe to soil potential readings were taken at the following locations.

Thumberbolt area: Thumberbolt Regency Mobile Park, Downing Avenue, Alhambra Apartments, Bowhan Avenue, Pounder Street & CSX Transportation Signal Shop. Ricon area: West 15th street & Hwy 21, Richland Street & E. Johnson Street & Rincon Methodist Church. Richmond Hill areas: Mimosa Street & Linwood Avenue and 87 Magnolia Street. Lake George area: Prospect Loop & Limerick Road. A review of the high pressure transmission line along Freedman Grove Road was checked and found to need additional clearing in the future.

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

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

- 
- |          |   |   |    |
|----------|---|---|----|
| <b>1</b> | Did the state use the current federal inspection form(s)? (C1)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

NA

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- |          |  |   |    |
|----------|--|---|----|
| <b>2</b> | Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? (C2)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

NA

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- |          |   |   |    |
|----------|---|---|----|
| <b>3</b> | Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? (C3)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

NA

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- |          |  |   |    |
|----------|--|---|----|
| <b>4</b> | 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.) (C4)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

NA

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- |          |  |   |    |
|----------|--|---|----|
| <b>5</b> | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (C5)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

NA

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- |          |   |   |    |
|----------|---|---|----|
| <b>6</b> | Did the state give written notice to PHMSA within 60 days of all probable violations found? (C6)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

NA

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- |          |  |   |    |
|----------|--|---|----|
| <b>7</b> | Did the state initially submit documentation to support compliance action by PHMSA on probable violations? (C7)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

NA

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- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>8</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

NA

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

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

- |          |  |   |    |
|----------|--|---|----|
| <b>1</b> | Did the state use the current federal inspection form(s)? (B21)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

NA

- |          |  |   |    |
|----------|--|---|----|
| <b>2</b> | Are results documented demonstrating inspection units were reviewed in accordance with state inspection plan? (B22)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

NA

- |          |   |   |    |
|----------|---|---|----|
| <b>3</b> | 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.) (B23)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

NA

- |          |   |   |    |
|----------|---|---|----|
| <b>4</b> | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? (B24)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

NA

- |          |  |   |    |
|----------|--|---|----|
| <b>5</b> | Did the state give written notice to PHMSA within 60 days of all probable violations found? (B25)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

NA

- |          |  |   |    |
|----------|--|---|----|
| <b>6</b> | Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? (B26)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

NA

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>7</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

NA

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