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DEBORAH K. FLANNAGAN
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FACILITIES PROTECTION UNIT DIRECTOR

Georgia Public Service Commission

(404) 463-6526
1-(800) 282-5813

244 Washington Street, SW
Atlanta, GA 30334-5701

FAX: (404) 463-6532
www.psc.state.ga.us

7/25/2013

Decatur County Industrial Air Park
P. O. Box 726
Bainbridge, GA 39818

Dear Mr. Phillip Breedlove

CERTIFIED MAIL

On 6/12/2013 a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an on-site inspection of your gas system and found probable violation(s) of the Pipeline Safety Regulations. The enclosed inspection report numbered LB13-027 is provided for your information and file.

Please review and respond to this report in accordance with the attached Instructions for Responding to Enforcement Letters Issued by the Georgia Public Service Commission.

If you have any questions or comments concerning this report, please call me at (404) 463-6526.

Thank you for your continuing contribution toward increased Pipeline Safety.

Sincerely,

Michelle Thebert
Director, Office of Pipeline/Facilities Safety

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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: LB13-027

OPERATOR: Decatur County Industrial Air Park

PERSON CONTACTED: Mr. Phillip Breedlove

INVESTIGATOR: Lynn Buffington

INSPECTION DATE: 6/12/2013 **REPORT MAILED DATE:** 7/25/2013

Any questions concerning this report may be directed to the above address or by telephoning (404) 463-6526.

1. PURPOSE OF INSPECTION

To meet with gas operator and conduct an inspection of its Public Awareness Program and supporting records.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.805(h)	Failure to provide training.	AT12-022	3/13/2012

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
192.13(c)	Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and...	LB13-027	6/12/2013

5. OTHER RECOMMENDATIONS/COMMENTS

On June 12-13, 2013, Commission Staff reported to the Decatur County Industrial Air Park to perform a public awareness inspection of the operator's plan and records for compliance with the minimum federal safety standards.

During the inspection the operator was represented by: Mr. Eric Swain (Industrial Park Manager). Commission Staff was represented by: Mr. Lynn Buffington (Principle Inspector) and Mr. David Lewis (Pipeline Safety Inspector).

At the time of this inspection, the Decatur County Industrial Air Park was under a violation of 49CFR Part 192.805(h) which was identified under inspection number AT12-022. Staff determined that the operator's existing probable violation requires another follow-up inspection be performed.

During this inspection, Staff noted deficiencies with the operator's program required by 49 CFR, §192.616 which states that:

Except for an operator of a master meter or petroleum gas system covered under paragraph (j) of this section, each pipeline operator must develop and implement a written continuing public education program that follows the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference, see § 192.7).

NOTICE OF AMENDMENT

As a result of this inspection, Staff has determined that the Decatur County Industrial Air Park has committed a probable violation of the pipeline safety standards, specifically:

§192.13 - What general requirements apply to pipelines regulated under this part?

(c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.

Observed deficiencies: The Decatur County Industrial Air Park failed to follow its procedures required by its public awareness program and to establish its written plan with all requirements under this part.

The specific deficiencies are identified in the attached inspection checklist under items 1.02, 1.06, 2.03, and 2.04.

NOTICE OF PROBABLE VIOLATION

As a result of this inspection, Staff has determined that the Decatur County Industrial Air Park has committed a probable violation of the pipeline safety standards, specifically:

§192.13 - What general requirements apply to pipelines regulated under this part?

(c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.

Probable Violation: The Decatur County Industrial Air Park failed to follow its procedures required by its public awareness program and to establish its written plan with all requirements under this part. The specific deficiencies are identified in the attached inspection checklist under items # 3.01, 3.02, and 3.03.

PROPOSED CIVIL PENALTY

Under Commission Rule 515-9-1.01, by virtue of the authority vested in the Commission by law and pursuant to orders issued by the Commission on May 4, 1967, July 6, 1967, April 23, 1968, and October 29, 1970, all Rules and Regulations prescribed by the United States Department of Transportation applicable to the "Transportation of Natural and Other Gas by Pipeline: Minimum Safety Standards" (C.F.R. 49, Parts 191 and 192) are by this Rule made the Rules and Regulations of the Georgia Public Service Commission for the safe installation and operation of all natural gas transmission and distribution facilities by companies subject to the jurisdiction of the Commission within this State.

Under Commission Rule 515-9-3-.08 (Written Formal Notice of Violation), the Commission may propose a civil penalty in conjunction with this notice of probable violation. Further, the Decatur County Industrial Air Park is subject to civil penalties under O.C.G.A. § 46-2-91 for violation of any Commission Order or Statute or Rule administered by the Commission. As provided by law, civil penalties can be assessed in the amount of \$15,000.00 for the first day of each violation and \$10,000.00 per violation/per day that each such violation continues. Staff determined that the initial date of probable violation was June 21, 2007.

Staff has reviewed the circumstances surrounding this incident and has recommended a civil penalty in the amount of \$15,000.00. Please note that this recommended amount is less than the amount authorized by Georgia law.

Operator / Inspector Information				
Operator: Decatur County Industrial Airpark				
Lead Inspector: L. Buffington		Asst Inspector(s): Mr. David Lewis		
Lead Inspector for previous inspection: L. Buffington				
Date Inspection: June 11, 2013		June 12, 2013		2
STARTED		COMPLETED		TOTAL INSPECTION DAYS
Report to be mailed to: Mr. Phillip Breedlove		County Administrator		
<small>Mayor / City Manager / Private Company Official</small>				
Certified Mailing Address: PO Box 727 Bainbridge, GA 31717				
E-Mail Address: pgbreedlove1@bellsouth.net			Telephone #: 229.248.3030	
# Units shown in database: 1		# Counties Operating in: Decatur		
<small>For Operators in more than one county, get listing of facilities from 7100 report seperated by county.</small>				
Specific Unit(s) Inspected: Decatur				
Additional Facilities Listing				
<small>For Operators in more than one county, get listing of facilities seperated by county.</small>				
# Regulator Stations: 1		# Valves: 17		# Critical Valves: 17
				# Rectifiers: 1
Operator Personnel				
Mr. Martin Duncan 4 years, Mr. Milton Smith 1 year, Mr. Eric Swain 4 years				
Inspection Type				
Scheduled Standard (Indicate Specific Inspection)		PAP		
<small>Comp / OQ / IMP / DIMP / D&A / PAP</small>				
Follow-up	Operator Training	Accident / Incident	Special Project	
LNG	IMP / DIMP	Damage Prevention		
Construction	OQ	D&A		
Field Work Completed				
5-Year Field Work for Comp Inspection (Indicate Type)				
CP	Overpressure	Odorization	Repaired / Active Leaks	
Leak Survey	B/D Leak Survey	Pressure Control	Emergency Valves	
Field Work Remaining to be Completed for 5-year Comprehensive				
X CP	Overpressure	Odorization	X Repaired / Active Leaks	
X Leak Survey	X B/D Leak Survey	X Pressure Control	X Emergency Valves	None
Person(s) Contacted at Operator: Mr. Eric Swain				
Exit Interview Conducted with:		Mr. Eric Swain		

	Yes	No	N/A
Did Operator have existing Probable Violations prior to this inspection?		X	
Were any existing Probable Violations cleared during this inspection?		X	
Were any existing Probable Violations not reviewed during this inspection?	X		
Enforcement Action be recommended for any previously existing probable violations?		X	
GPSC Rules Checklist Completed as part of 5-year Comprehensive Inspection?	X		
PHMSA Inspection Checklist Completed?	X		
All N/C Items Explained?	X		
Field Forms Completed & Attached to report?	X		
PHMSA Form 13 Completed?	X		
Operator information updated in pipeline database?	X		
Obtained Listing of Operator Personnel	X		

PUBLIC AWARENESS PROGRAM EFFECTIVE INSPECTION SPECIFIC INFORMATION

Control Information

INSPECTION START DATE: 6/11/2013
 INSPECTION END DATE: 6/12/2013
 OPERATOR ID: 3188
 OPERATOR NAME: DECATUR COUNTY INDUSTRIAL AIRPARK
 STATE/OTHER ID: Georgia
 ACTIVITY RECORD ID NUMBER
 COMPANY OFFICIAL: Phillip Breedlove
 COMPANY OFFICIAL STREET: Po Box 726
 COMPANY OFFICIAL CITY: Bainbridge
 COMPANY OFFICIAL STATE: GA
 COMPANY OFFICIAL ZIP: 31717
 COMPANY_OFFICIAL_TITLE: County Administrator
 PHONE NUMBER: (229) 248-3030
 FAX NUMBER:
 EMAIL ADDRESS: pgbreedlove1@bellsouth.net
 WEB SITE: n/a
 TOTAL MILEAGE: 8
 TOTAL MILEAGE IN HCA: 8
 NUMBER OF SERVICES (DISTR): 34
 ALTERNATE MAOP (80% RULE): no
 NUMBER OF SPECIAL PERMITS: 0
 INITIAL DATE OF PAP: 6/19/2006
 TITLE OF CURRENT PAP: Public Awareness Plan
 CURRENT PAP VERSION: 1
 CURRENT PAP DATE: 6/19/2006

DATE SUBMITTED FOR APPROVAL:

DIRECTOR APPROVAL:

APPROVAL DATE:

OPERATORS COVERED UNDER PROGRAM:	<table border="0" style="width: 100%;"> <tr> <th style="text-align: left;">OPERATOR ID</th> <th style="text-align: left;">NAME</th> </tr> <tr> <td style="padding-left: 20px;">3188</td> <td>DECATUR COUNTY INDUSTRIAL AIRPARK</td> </tr> </table>	OPERATOR ID	NAME	3188	DECATUR COUNTY INDUSTRIAL AIRPARK
OPERATOR ID	NAME				
3188	DECATUR COUNTY INDUSTRIAL AIRPARK				

UNITS COVERED UNDER PROGRAM:	<table border="0" style="width: 100%;"> <tr> <th style="text-align: left;">UNIT ID</th> <th style="text-align: left;">NAME</th> </tr> <tr> <td style="padding-left: 20px;">3188</td> <td>Decatur</td> </tr> </table>	UNIT ID	NAME	3188	Decatur
UNIT ID	NAME				
3188	Decatur				

PERSON INTERVIEWED	TITLE/ORGANIZATION	PHONE NUMBER	EMAIL ADDRESS
Eric Swain	Industrial Park Manager	(229) 248-3004	decatuip2@gmail.com

ENTITY NAME	PART OF PLAN AND/OR EVALUATION	PHONE NUMBER	EMAIL ADDRESS
City Services	Evaluations	(229) 226-6569	csi-thomasville.com
City Services	Implementation	(229) 226-6569	csi-thomasville.com
City Services	Message content development	(229) 226-6569	csi-thomasville.com
City Services	Plan development	(229) 226-6569	csi-thomasville.com
City Services	Pre-test materials	(229) 226-6569	csi-thomasville.com

INSPECTOR REPRESENTATIVE(S)	PHMSA/STATE	REGION/STATE	EMAIL ADDRESS	LEAD
L. Buffington	State	GA	lynnb@psc.state.ga.us	<input checked="" type="checkbox"/>
David Lewis	State	GA	dlewis@psc.state.ga.us	<input type="checkbox"/>

Mileage Covered by Public Awareness Program (by Company and State)

Based on the most recently submitted annual report, list each company and subsidiary separately, broken down by state (using 2-letter designation). Also list any new lines in operation that are not included on the most recent annual report. If a company has intrastate and/or interstate mileage in several states, use one row per state. If there both gas and liquid lines, use the appropriate table for intrastate and/or interstate.

Jurisdictional to Part 192 (Gas) Mileage (Intrastate)

COMPANY NAME	OPERATOR ID	PRODUCT TYPE	STATE	GATHERING	TRANSMISSION	DISTRIBUTION*	REMARKS (new?)
				INTRASTATE	INTRASTATE	INTRASTATE	
DECATUR COUNTY INDUSTRIAL AIRPARK	3188	Natural Gas	GA	0	0	8	

1. Supply company name and Operator ID, if not the master operator from the first page (i.e., for subsidiary companies).
2. Use OPS-assigned Operator ID. Where not applicable, leave blank or enter N/A
3. Use only 2-letter state codes in column #3, e.g., TX for Texas.
4. Enter number of applicable miles in all other columns. (Only positive values. No need to enter 0 or n/a.)
5. *Please do not include Service Line footage. This should only be MAINS.

Please provide a comment or explanation for inspection results for each question.

1. Administration and Development of Public Awareness Program

1.01 Written Public Education Program

Does the operator have a written continuing public education program or public awareness program (PAP) in accordance with the general program recommendations in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference), by the required date, except for master meter or petroleum gas system operators?

- Verify the operator has a written public awareness program (PAP).
- Review any Clearinghouse deficiencies and verify the operator addressed previous Clearinghouse deficiencies, if any.

addressed in the operator's PAP.

- Identify the location where the operator's PAP is administered and which company personnel is designated to administer and manage the written program.
- Verify the date the public awareness program was initially developed and published.

CODE REFERENCE: § 192.616 (h); § 195.440 (h)

- S - Satisfactory (explain)
 U - Unsatisfactory (explain)
 N/A - Not Applicable (explain)
 N/C - Not Checked (explain)

COMMENTS:

Yes.
 However, clearinghouse deficiencies have not been addressed.
 The plan is administered at the Industrial Park Manager's Office.
 Mr. Swain administers the program initially developed in June 2006.

1.02 Management Support

Does the operator's program include a statement of management support (i.e., is there evidence of a commitment of participation, resources, and allocation of funding)?

- Verify the PAP includes a written statement of management support.
- Determine how management participates in the PAP.
- Verify that an individual is named and identified to administer the program with roles and responsibilities.
- Verify resources provided to implement public awareness are in the PAP. Determine how many employees involved with the PAP and what their roles are.
- Determine if the operator uses external support resources for any implementation or evaluation efforts.

CODE REFERENCE: § 192.616 (a); § 195.440 (a), API RP 1162 Section 2.5 and 7.1

- S - Satisfactory (explain)
 U - Unsatisfactory (explain)
 N/A - Not Applicable (explain)
 N/C - Not Checked (explain)

COMMENTS:

No.
 No letter of management support.
 No other issues with this protocol.

1.03 Unique Attributes and Characteristics

Does the operator's program clearly define the specific pipeline assets or systems covered in the program and assess the unique attributes and characteristics of the pipeline and facilities?

- Verify the PAP includes all of the operator's system types/assets covered by PAP (gas, liquid, HVL, storage fields, gathering lines etc).
- Identify where in the PAP the unique attributes and characteristics of the pipeline and facilities are included (i.e. gas, liquids, compressor stations, valves, breakout tanks, odorizers).

CODE REFERENCE: § 192.616 (b); § 195.440 (b), API RP 1162 Section 2.7 and Section 4

- S - Satisfactory (explain)
 U - Unsatisfactory (explain)
 N/A - Not Applicable (explain)
 N/C - Not Checked (explain)

COMMENTS:

Yes.
 No issues discovered with this protocol.

1.04 Stakeholder Audience Identification

Does the operator's program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?

- Identify how the operator determines stakeholder notification areas and distance on either side of the pipeline.
- Determine the process and/or data source used to identify each stakeholder audience.
- Select a location along the operator's system and verify the operator has a documented list of stakeholders consistent with the requirements and references noted above.

- Affected public
- Emergency officials
- Public officials
- Excavators

CODE REFERENCE: § 192.616 (d), (e), (f); § 195.440 (d), (e), (f), API RP 1162 Section 2.2 and Section 3

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
--

COMMENTS:

Yes.
 The operator has a list that contains the addresses of the affected non customers along the feeder pipeline and a list of every customer that must be contacted in the entire industrial park.

1.05 Message Frequency and Message Delivery

Does the operator's program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas in which the operator transports gas, hazardous liquid, or carbon dioxide?

- Identify where in the operator's PAP the combination of messages, delivery methods, and delivery frequencies are included for the following stakeholders: (1) affected public (2) emergency officials (3) local public officials, and (4) excavators.

- Affected public
- Emergency officials
- Public officials
- Excavators

CODE REFERENCE: § 192.616 (f); § 195.440 (f), API RP 1162 Sections 3-5

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
--

COMMENTS:

Yes.
 No issues identified with this protocol.

1.06 Written Evaluation Plan

Does the operator's program include a written evaluation process that specifies how the operator will periodically evaluate program implementation and effectiveness? If not, did the operator provide justification in its program or procedural manual?

- Verify the operator has a written evaluation plan that specifies how the operator will conduct and evaluate self-assessments (annual audits) and effectiveness evaluations.
- Verify the operator's evaluation process specifies the correct frequency for annual audits (1 year) and effectiveness evaluations (no more than 4 years apart).
- Identify how the operator determined a statistical sample size and margin-of-error for stakeholder audiences surveys and feedback.

CODE REFERENCE: § 192.616 (c),(i); § 195.440 (c),(i)

<input type="radio"/> S - Satisfactory (explain) <input checked="" type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

No.

The operator plan does not contain a process for conducting an annual audit.

2. Program Implementation

2.01 English and other Languages

Did the operator develop and deliver materials and messages in English and in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?

- Determine if the operator delivers material in languages other than English and if so, what languages.
- Identify the process the operator used to determine the need for additional languages for each stakeholder audience.
- Identify the source of information the operator used to determine the need for additional languages and the date the information was collected.

CODE REFERENCE: § 192.616 (g); § 195.440 (g), API RP 1162 Section 2.3.1

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

Yes.

The operator voluntarily provides the contents of their message hand outs in English and Spanish.

No issues identified

2.02 Message Type and Content

Did the messages the operator delivered specifically include provisions to educate the public, emergency officials, local public officials, and excavators on the:

- Use of a one-call notification system prior to excavation and other damage prevention activities;
 - Possible hazards associated with unintended releases from a gas, hazardous liquid, or carbon dioxide pipeline facility;
 - Physical indications of a possible release;
 - Steps to be taken for public safety in the event of a gas, hazardous liquid, or carbon dioxide pipeline release; and
 - Procedures to report such an event (to the operator)?
-
- Verify all required information was delivered to each of the primary stakeholder audiences.
 - Verify the phone number listed on message content is functional and clearly identifies the operator to the caller.

- Affected public
- Emergency officials
- Public officials
- Excavators

CODE REFERENCE: § 192.616 (d), (f); § 195.440 (d), (f)

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:
 Yes.
 No issues identified with this protocol.

2.03 Messages on Pipeline Facility Locations

Did the operator develop and deliver messages to advise affected municipalities, school districts, businesses, and residents of pipeline facility location?

- Verify that the operator developed and delivered messages advising municipalities, school districts, businesses, residents of pipeline facility locations.

CODE REFERENCE: § 192.616 (e)(f); § 195.440 (e)(f)

<input type="radio"/> S - Satisfactory (explain) <input checked="" type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:
 No.
 The operator has not developed a process for advising affected municipalities, school districts, businesses, and residents, of pipeline facilities that are adjacent to their property (e.g. pressure regulating stations).

2.04 Baseline Message Delivery Frequency

Did the operator's delivery for materials and messages meet or exceed the baseline frequencies specified in API RP 1162, Table 2-1 through Table 2.3? If not, did the operator provide justification in its program or procedural manual?

- Identify message delivery (using the operator's last five years of records) for the following stakeholder audiences:

- Affected public
- Emergency officials
- Public officials
- Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c)

- S - Satisfactory (explain)
- U - Unsatisfactory (explain)
- N/A - Not applicable (explain)
- N/C - Not Checked (explain)

COMMENTS:

No.
The operator did not have five years of complete records.

2.05 Considerations for Supplemental Program Enhancements

Did the operator consider, along all of its pipeline systems, relevant factors to determine the need for supplemental program enhancements as described in API RP 1162 for each stakeholder audience?

- Affected public
- Emergency officials
- Public officials
- Excavators

Determine if the operator has considered and/or included other relevant factors for supplemental enhancements.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 6.2

- S - Satisfactory (explain)
- U - Unsatisfactory (explain)
- N/A - Not applicable (explain)
- N/C - Not Checked (explain)

COMMENTS:

Yes.
No issues identified with this program protocol.

2.06 Maintaining Liaison with Emergency Response Officials

Did the operator establish and maintain liaison with appropriate fire, police, and other public officials to: learn the responsibility and resources of each government organization that may respond, acquaint the officials with the operator's ability in responding to a pipeline emergency, identify the types of pipeline emergencies of which the operator notifies the officials, and plan how the operator and other officials can engage in mutual assistance to minimize hazards to life or property?

- Examine the documentation to determine how the operator maintains a relationship with appropriate emergency officials.
- Verify the operator has made its emergency response plan available, as appropriate and necessary, to emergency response officials.
- Identify the operator's expectations for emergency responders and identify whether the expectations are the same for all locations or does it vary depending on locations.
- Identify how the operator determined the affected emergency response organizations have adequate and proper resources to respond.
- Identify how the operator ensures that information was communicated to emergency responders that did not attend training/information sessions by the operator.

CODE REFERENCE: § 192.616 (c), § 195.440 (c), API RP 1162 Section 4.4

- S - Satisfactory (explain)
 U - Unsatisfactory (explain)
 N/A - Not applicable (explain)
 N/C - Not Checked (explain)

COMMENTS:

Yes.

The operator holds regularly scheduled face to face meetings with first responders to the Decatur County Industrial park and utilizes their Gas Emergency Plan and Countywide Safety Plan to conduct the meetings.

3. Program Evaluation & Continuous Improvement (Annual Implementation Audits)**3.01 Measuring Program Implementation**

Has the operator performed an audit or review of its program implementation annually since it was developed? If not, did the operator provide justification in its program or procedural manual?

- Verify the operator performed an annual audit or review of the PAP for each implementation year.

CODE REFERENCE: § 192.616 (c), (i); § 195.440 (c), (i), API RP 1162 Section 8.3

- S - Satisfactory (explain)
 U - Unsatisfactory (explain)
 N/A - Not applicable (explain)
 N/C - Not Checked (explain)

COMMENTS:

No.

3.02 Acceptable Methods for Program Implementation Audits

Did the operator use one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) to complete the annual audit or review of its program implementation? If not, did the operator provide valid justification for not using one of these methods?

- Determine how the operator conducts annual audits/reviews of its PAP.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.3

- S - Satisfactory (explain)
 U - Unsatisfactory (explain)
 N/A - Not applicable (explain)
 N/C - Not Checked (explain)

COMMENTS:

No.

The operator has not conducted any annual audits.

3.03 Program Changes and Improvements

Did the operator make changes to improve the program and/or the implementation process based on the results and findings of the annual audit? If not, did the operator provide justification in its program or procedural manual?

- Determine if the operator assessed the results of its annual PAP audit/review then developed and implemented changes in its program, as a result.

• If not, determine if the operator documented the results of its assessment and provided justification as to why no changes were needed.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.3

- S - Satisfactory (explain)
 U - Unsatisfactory (explain)
 N/A - Not applicable (explain)
 N/C - Not Checked (explain)

COMMENTS:

No.

No annual audits.

4. Program Evaluation & Continuous Improvement (Effectiveness Evaluations)**4.01 Evaluating Program Effectiveness**

Did the operator perform an effectiveness evaluation of its program (or no more than 4 years following the effective date of program implementation) to assess its program effectiveness in all areas along all systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

- Verify the operator conducted an effectiveness evaluation of its program (or no more than 4 years following the effective date of program implementation).

• Document when the effectiveness evaluation was completed.

• Determine what method was used to perform the effectiveness evaluation (in-house, by 3rd party contractor, participation in and use the results of an industry group or trade association).

• Identify how the operator determined the sample sizes for audiences in performing its effectiveness evaluation.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP1162 Section 8.4

S - Satisfactory (explain)
 U - Unsatisfactory (explain)
 N/A - Not Applicable (explain)
 N/C - Not Checked (explain)

COMMENTS:

Yes.
 The operator conducted an effectiveness evaluation of their plan on June 18, 2010.
 The operator conducted their stakeholder survey and obtained 100% response.

4.02 Measure Program Outreach

In evaluating effectiveness, did the operator track actual program outreach for each stakeholder audience within all areas along all assets and systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

- Examine the process the operator used to track the number of individuals or entities reached within each intended stakeholder audience group.
- Determine the outreach method the operator used to perform the effectiveness evaluation (e.g., questionnaires, telephone surveys, etc).
- Determine how the operator determined the statistical sample size and margin-of-error for each of the four intended stakeholder audiences.

- [] Affected public
- [] Emergency officials
- [] Public officials
- [] Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.1

S - Satisfactory (explain)
 U - Unsatisfactory (explain)
 N/A - Not Applicable (explain)
 N/C - Not Checked (explain)

COMMENTS:

Yes.
 The operator reached 100% of their stakeholder audience by going door to door to each customer and to each of the 10 residents along their feeder pipeline.

4.03 Measure Percentage Stakeholders Reached

Did the operator determine the percentage of the individual or entities actually reached within the target audience within all areas along all systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

- Document how the operator determined the statistical sample size and margin-of-error for each of the four intended stakeholder audiences.
- Document how the operator estimated the percentage of individuals or entities actually reached within each intended stakeholder audience group.

- Affected public
- Emergency officials
- Public officials
- Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.1

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
--

COMMENTS:

Yes.
The operator reached 100% of their stakeholder audiences.

4.04 Measure Understandability of Message Content

In evaluating effectiveness, did the operator assess the percentage of the intended stakeholder audiences that understood and retained the key information in the messages received, within all areas along all assets and systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

(Reference: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.2)

- Examine the operator's evaluation results and data to assess the percentage of the intended stakeholder audience that understood and retained the key information in each PAP message.
- Verify the operator assessed the percentage of the intended stakeholder audience that (1) understood and (2) retained the key information in each PAP message.
- Determine if the operator pre-tests materials.

- Affected public
- Emergency officials
- Public officials
- Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.2

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
--

COMMENTS:

Yes.
The operator utilized pretested materials.

4.05 Measure Desired Stakeholder Behavior

In evaluating its public awareness program effectiveness, did the operator attempt to determine whether appropriate preventive behaviors have been understood and are taking place when needed, and whether appropriate response and mitigative behaviors would occur and/or have occurred? If not, did the operator provide justification in its program or procedural manual?

- Examine the operator’s evaluation results and data to determine if the stakeholders have demonstrated the intended learned behaviors.
- Verify the operator determined whether appropriate prevention behaviors have been understood by the stakeholder audiences and if those behaviors are taking place or will take place when needed.

- Affected public
- Emergency officials
- Public officials
- Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.3

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:
 Yes.
 The operator was face to face when delivering materials.
 No issues identified.

4.06 Measure Bottom-Line Results

In evaluating its public awareness program effectiveness, did the operator attempt to measure bottom-line results of its program by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures? Did the operator consider other bottom-line measures, such as the affected public's perception of the safety of the operator's pipelines? If not, did the operator provide justification in its program or procedural manual?

- Examine the operator’s process for measuring bottom-line results of its program.
- Verify the operator measured bottom-line results by tracking third-party incidents and consequences.
- Determine if the operator considered and attempted to measure other bottom-line measures, such as the affected public’s perception of the safety of the operator’s pipelines. If not, determine if the operator has provided justification in its program or procedural manual for not doing so.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.4

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
--

COMMENTS:
 Yes.
 By delivering materials face to face and speaking with each stakeholder audience the operator was able to determine desired behaviors and bottom line results.

4.07 Program Changes

Did the operator identify and document needed changes and/or modifications to its public awareness program(s) based on the results and findings of its program effectiveness evaluation? If not, did the operator provide justification in its program or procedural manual?

- Examine the operator's program effectiveness evaluation findings.
- Identify if the operator has a plan or procedure that outlines what changes were made.
- Verify the operator identified and/or implemented improvements based on assessments and findings.

CODE REFERENCE: § 192.616 (c), § 195.440 (c), API RP 1162 Section 2.7 Step 12 and 8.5

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)
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COMMENTS:

Yes.

The operator determined that no changes or modifications are necessary during their first annual/ four year audit.

5. Inspection

SUMMARY:

This operator has not conducted their Public Awareness Program as required by their written plan.

FINDINGS:

The operator failed to perform annual audits of their plan and modify the plan as needed.

PHMSA Pipeline Drug & Alcohol Questions

Instructions

1. Use in conjunction with Unit inspections
2. Interview the primary operator contact for the Unit inspection you are conducting and enter their responses. Do not request the operator substance abuse expert to provide responses to these questions.
3. Send completed form to stanley.kastanas@dot.gov

Name of Operator	Decatur County Industrial Airpark	Op ID #	03188
Inspector	Lynn Buffington, David Lewis	Unit #	1
Date of Inspection	6/11/2013		
Inspection Location City & State	414 Fourth Ramp, Bainbridge, GA. 39817		
Operator Employee Interviewed	Eric Swain	Phone #	229-248-3004
Position/Title	Industrial Park Manager		
Operator Designated Employer Representative (DER), (a.k.a. Substance Abuse Program Manager)		Beverly King/County Clerk	
DER Phone #	229-248-3030		

§199	Pipeline Safety Regulations Drug and Alcohol Testing	Yes	No	Does Not Know
.3, .101 .201, .245	1. Does the company have a plan for drug and alcohol testing of employees and contractors performing, or ready to perform, covered functions of operations, maintenance, and emergency response?	X		
Comments				
.3 .105(c) .225(b)	2. Does the company perform random drug testing and reasonable suspicion drug and alcohol testing of employees performing covered functions? For random drug testing, enter the number of times per year employees are selected and the number of employees in each selection in Comments below.	X		
Comments				
.3 .105(b)	3. Does the company conduct post-accident/incident drug and alcohol testing for employees who have caused or contributed to the consequences of an accident/incident? Enter the position/title of the employee who would make the decision to conduct post-accident/incident testing in Comments below.	X		
Comments				
.113(c) .117(a)(4) .227(b)(2) .241	4. Does the company provide training for supervisors on the detection of potential drug abuse (minimum 60 minutes) and alcohol misuse (minimum 60 minutes)?	X		
Comments				
.3 .113(b) .117(a)(4) .239(b)(11)	5. Does the company give covered employees an explanation of the drug & alcohol policies and distribute information about the Employee Assistance Program, including a hotline number? Provide details in Comments below.	X		
Comments	#2- Operator has 3 total employees and they random pick 4 times per year. #3- Beverly King/County Clerk #4-Included in employee handbook			

PROCESS FOR RESPONDING TO ENFORCEMENT LETTERS ISSUED BY THE GEORGIA PUBLIC SERVICE COMMISSION

Commission Rules 515-9-3-.09 and .10 provide the options available to respond to an Enforcement Letter is issued by the Facilities Protection Unit Director/Pipeline Safety Director (“Director”) of the Georgia Public Service Commission (“Commission”). The following information provides Operators with the process for responding to said Enforcement Letters.

The Operator shall submit the response at the following address:

Ms. Michelle Thebert, Director
Georgia Public Service Commission
Facilities Protection Unit
244 Washington Street, SW
Atlanta, Georgia 30334

You must provide **five (5)** copies of any response.

Unless otherwise noted, the Operator has thirty (30) days from the date the Enforcement Letter is filed to submit the response, or request an informal conference with the Director. Any Operator who chooses to request an informal conference shall request such a conference through either emailing the Director at michellet@psc.state.ga.us or by calling at (404) 463-2765.

I. Types of Enforcement Letters-

- a. Notice of Probable Violation (NOPV)-The purpose of this enforcement action is to document and to provide notice concerning any probable violations of a rule or regulation. A NOPV requires a response from the Operator detailing how the issue will be addressed or corrected. A NOPV may or may not contain a proposed civil penalty.
- b. Notice of Amendment (NOA)-The purpose of this enforcement action is to document and to provide notice concerning a required plan amendment for an Operator. A NOA requires a response from the Operator detailing how the issue will be addressed or corrected.
- c. Warning Letter-The purpose of this letter is to document and to provide notice concerning any probable violations of a rule or regulation. A Warning Letter only requires a response from the Operator acknowledging receipt of the letter.
- d. Letter of Concern- The purpose of this letter is to document concerns Staff has with an Operator’s plans, programs, or facilities, which could result in a probable violation unless action is taken to address the issue.

II. Process for Responding to Enforcement Letters

- a. Notice of Probable Violation with a Proposed Civil Penalty
You may request an informal conference with the Director and/or her Staff to discuss the NOPV and proposed civil penalty. The violation/proposed civil penalty may be resolved at this stage; however, if agreement cannot be reached, enforcement procedures shall continue. If you chose not to seek an informal conference, the following due process options are available:

- 1) If you are not contesting the violation alleged or the proposed civil penalty, submit a written response notifying the Director of your desire to settle this matter by paying the recommended proposed civil penalty. Upon such notification, you will be provided with a Consent Agreement that shall be fully executed by the Operator and submitted along with a certified check for the full amount of the recommended civil penalty and made payable to the Georgia Public Service Commission. You must ensure that the Operator's name and the applicable Inspection Report No. are included in the "memo" line of the certified check, and the certified check shall be mailed to:

Ms. Michelle Thebert, Director
Georgia Public Service Commission
Facilities Protection Unit
244 Washington Street, SW
Atlanta, Georgia 30334

- 2) If you are not contesting the violation alleged, but are contesting the proposed civil penalty, and wish to submit written explanations, information, or other materials you believe warrant mitigation of the civil penalty, you may submit such materials. The Director and/or her Staff will review the materials and provide the Operator with a draft Consent Agreement that will represent the Staff's initial settlement offer. You must either sign the draft Consent Agreement or submit a counter-offer back to the Staff within thirty (30) days.

Pursuant to Commission Rule 515-9-3-.011, the factors that the Commission shall consider include:

- (a) The appropriateness of the proposed civil penalty in relation to the size of the business of the person charged;
- (b) The gravity of the violation;
- (c) The good faith of the person charged in attempting to achieve compliance;
- (d) The Operator's history of prior violations; and
- (e) Other matters as justice may require.

If an agreement cannot be reached, the alleged violation and proposed civil penalty shall be referred to the Commission for formal resolution in either of the following manners:

- (a) The Commission may seek an injunction or mandamus in superior court in cases where immediate action is necessary; or
- (b) The Commission may issue a show cause order and/or schedule a hearing requiring the Operator to demonstrate why the Operator should not be subject to the penalties set forth by the O.C.G.A. Section 46-2-91.

- 3) If you are contesting both the alleged violation and the proposed civil penalty, you may request a hearing before the Commission for formal resolution as detailed below.

b. Notice of Probable Violation without a Proposed Civil Penalty

You may request an informal conference with the Director and/or her Staff to discuss the NOPV. The violation may be resolved at this stage; however, if agreement cannot be

reached, enforcement procedures shall continue. If you chose not to seek an informal conference, the following due process options are available:

- 1) You may submit a written statement to the Director indicating that corrective measures have achieved compliance; or
- 2) You may submit a written plan of action to the Director outlining the corrective measures that will be taken to achieve compliance and when compliance is anticipated.

If the corrective measures that you present, or propose, are acceptable to the Director and/or her Staff, the violation may be closed at this point. Such acceptance shall be verified by written statement issued by the Director following a re-inspection of the Operator's facilities.

If the proposed solution as outlined is not satisfactory to the Director and/or her Staff, the violation shall be referred to the Commission for formal resolution in either of the following manners:

- (a) The Commission may seek an injunction or mandamus in superior court in cases where immediate action is necessary; or
- (b) The Commission may issue a show cause order and/or schedule a hearing requiring the Operator to demonstrate why the Operator should not be subject to the penalties set forth by the O.C.G.A. Section 46-2-91.

c. Notice of Amendment (NOA)

You may request an informal conference with the Director and/or her Staff to discuss the NOA. If you chose not to seek an informal conference, the following due process options are available:

- (1) If you are not contesting the NOA, you must submit to the Director the measures taken or of your plan(s) to address the observed deficiencies identified in the NOA. If the corrective measures that you present, or propose, are acceptable to the Director and/or her Staff, the violation may be closed at this point. Such acceptance shall be verified by written statement issued by the Director following a re-inspection of the Operator's facilities;
- (2) If you are not contesting the NOA, but you wish to submit written explanations, information, or other materials believed to warrant modification of the NOA in whole or in part, or if you are seeking clarification of the terms of the NOA, you may submit such materials; or
- (3) If you wish to contest the NOA, you must submit written explanations, information, or other materials in answer to the allegations in the NOA stating your reasons for objecting to the NOA, in whole or in part. If the information provided is acceptable to the Director and/or her Staff, the issue may be closed at this point. Such acceptance shall be verified by written statement issued by the Director.

d. Warning Letter

You must respond within thirty (30) days acknowledging receipt of the Warning Letter; however, you are not required to provide a corrective action or file a written plan of action. The Operator is warned that if appropriate action is not taken to correct the probable violation(s), enforcement action may be taken if a subsequent inspection reveals continuing or new violation(s).

e. Letter of Concern

You must respond within thirty (30) days acknowledging receipt of the LOC. The Operator is warned that if appropriate action is not taken to correct the probable violation(s), enforcement action may be taken if a subsequent inspection reveals continuing or new violation(s).

III. Procedures for Requesting a Hearing

You have the right to request a hearing to contest the alleged probable violations, recommended civil penalties, and all other proposed actions of enforcement. A request for a hearing must be submitted in writing and in accordance with Commission Rule 515-2-1-.04. You must include a statement of the issues that you intend to raise at the hearing. The issues may relate to the allegations, new information, proposed compliance order, proposed civil penalty, or any other recommendation for enforcement action. Please refer to Commission Rule 515-93-.11 and O.C.G.A. § 46-2-91 for assessment considerations upon which civil penalties are based. An Operator's failure to specify an issue may result in a waiver of the right to raise that issue at hearing. Your request must also indicate whether or not you will be represented by counsel at the hearing.

You are advised that any material provided to the Commission, and all materials prepared by the Commission, including the Notice of Probable Violations and any Orders issued in this case, may be considered public information and subject to disclosure under the Georgia Open Records Act (O.C.G.A. § 50-18-70 et seq.).

If you believe that any portion of your response material is security sensitive, privileged, confidential, or may cause your company competitive disadvantages and would qualify for protection under the Commission's "Trade Secret Rule" (Commission Rule 515-3-1-.11), you must, along with the complete original document clearly marked "TRADE SECRET" on each page, provide a second copy of the document with the portions you believe qualify for trade secret treatment redacted, and an explanation of why you believe the redacted information qualifies for such trade secret treatment. Should the Commission receive a request for disclosure of any "TRADE SECRET" material, you will be notified, if after review, the materials and your provided justification are deemed not to meet any exemptions provided in the Georgia Open Records Act. You may appeal the Commission's decision to release material at that time. Your appeal will stay the release of those materials until a final decision is made.



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Mr. Phillip Breedlove
 Decatur County Industrial Air Park
 P. O. Box 726
 Bainbridge, GA 39818
 LB13-027

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>Mr. Phillip Breedlove Decatur County Industrial Air Park P. O. Box 726 Bainbridge, GA 39818 LB13-027</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
<p>2. Article Number (Transfer from service label)</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
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