



Georgia Pipeline Emergency Responders Initiative (GPERI)



Prepared by

**Georgia Pipeline Operator & Emergency
Responder Coalition**



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The Georgia Pipeline Operator & Emergency Responder Coalition Steering Committee prepared this document to provide information for improving the response to pipeline emergencies in Georgia. The Georgia Pipeline Emergency Responders Initiative (Initiative) discussed herein will be implemented and primarily used by emergency response officials and pipeline operators.

The Steering Committee members believe the implementation of this Initiative will significantly improve the ability of Georgia emergency responders to manage pipeline emergencies through improved training, cooperation and communication with pipeline operators. Therefore, the undersigned Steering Committee members endorse and support this Initiative.

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This document is not intended to be inclusive of all regulatory requirements or to satisfy the intent of the rules noted. It is the responsibility of the user to comply with all applicable local, state, and federal regulatory requirements. The use of this document is voluntary and should be considered as guidance to assist emergency response officials and pipeline operators in enhancing cooperation, communication, outreach, and knowledge necessary to protect the public and the environment from risks inherent in transporting hazardous materials through pipelines.

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EXECUTIVE SUMMARY

In Georgia, 92 different companies and municipalities operate more than 85,000 miles of natural gas and hazardous liquid pipelines. With that kind of pipeline infrastructure, the potential for pipeline emergencies clearly exists. Significant pipeline incidents, though infrequent events, have potentially high consequences in loss of life, serious injuries, property damage and disruption of fuel supplies. In recognition of the potential risks inherent in pipeline emergencies, the Georgia Pipeline Operator and Emergency Responder Coalition (GPOERC), hereafter referred to as “Coalition” was founded on May 15, 2012. Coalition members include representatives from the pipeline industry, regulatory agencies, local governments, and emergency responder organizations.

The mission of this diverse group of stakeholders is to *“Advance the ability of Georgia emergency responders to manage pipeline emergencies through improved training, cooperation and communication with pipeline operators.”*

Following an initial meeting, the Coalition appointed a Steering Committee to develop a training and two-way communication program. This program, known as the Georgia Pipeline Emergency Responders Initiative (GPERI) is described herein. This initiative is designed as a public-private partnership among emergency responders, pipeline operators and regulators. The result leverages the training expertise and organization of the Georgia Public Safety Training Center, the command and communication structure of the Georgia Association of Fire Chiefs (GAFC), and the expertise of pipeline operators, within a framework that meets the requirements of federal and state laws for emergency responder outreach. Specifically, this initiative 1) provides an alternative approach to communications with emergency responders by implementing a program customized to the needs of responder positions, 2) involves approved training content based on the Pipeline Emergencies course, and 3) requires a written test of responder comprehension. The value of a more formal and demanding program, coupled with annual messaging to responders by other means (email, phone, meetings), strengthens awareness. This approach improves public safety and will assist operators in meeting regulatory requirements by accomplishing the following:

- Providing sustainable pipeline emergency training for first responders
- Improving responder awareness of the need for this type of training
- Establishing a range of pipeline emergency training delivery methods
- Enhancing operator public awareness outreach programs
- Promoting prevention of pipeline emergencies by increasing responder roles in pipeline damage prevention

The Coalition’s charter places the initiative in the hands of an eleven-member Board consisting of four emergency responders, four pipeline operators and three nonvoting members that function as a nonprofit under the umbrella of the GAFC. Initial “seed money” for the initiative was provided through the Georgia Public Service Commission to the GAFC for training development. Going forward, the initiative will be sustained by funding from pipeline operators. A funding formula has been developed to support the program annually for an initial three-year period. Because operator participation is voluntary, this formula has built-in flexibility to provide dependable revenue streams, even if some operators choose not to participate.

The initiative is designed to enhance responders’ understanding of pipeline hazards; strengthen relationships among responders, pipeline operators and regulators in the interest of public safety; and improve the management of pipeline emergencies. This program may serve as a model for other states seeking to accomplish similar objectives.

I. INTRODUCTION

The Georgia Pipeline Operator and Emergency Responder Coalition (hereafter referred to as the Coalition) was founded on May 15, 2012. The Coalition was organized to enhance responses to pipeline emergencies through improved communication and training. Significant pipeline incidents happen infrequently, but when they do occur, they have potentially high consequences in loss of life, serious injuries and property damage.

Coalition members include representatives from the pipeline industry, regulatory agencies, local governments, and emergency responder organizations. The Coalition formed a “Steering Committee” (Committee) to develop a program for responding to high consequence events. The Committee is represented by the following entities:

- Fire departments
- Georgia Association of Fire Chiefs (GAFC)
- Georgia State Fire Fighters Association (GSFFA)
- Georgia Municipal Association (Gas Section)
- Municipal gas systems
- Georgia State Fire Marshall’s Office
- Interstate pipeline operators (gas and liquids)
- Intrastate pipeline operators (gas)
- Georgia Public Service Commission (GAPSC)
- Georgia Public Safety Training Center (GPSTC)
- Pipeline and Hazardous Material Safety Administration (PHMSA)
- Georgia Emergency Management Agency (GEMA)
- Georgia Forestry Commission (GFC)

A list of Committee members is provided in Appendix A, and detailed descriptions of participating Georgia stakeholder groups that have an interest in pipeline safety issues are provided in Appendix B.

The Committee developed and adopted the following Mission Statement:

“Advance the ability of Georgia emergency responders to manage pipeline emergencies through improved training, cooperation and communication with pipeline operators.”

In addition, the Committee developed the following list of goals and objectives to achieve in order to build a program that supports the Coalition’s mission:

- Improve and sustain effective communication between emergency responders in Georgia and the pipeline industry.
- Increase emergency responders’ knowledge of pipelines in Georgia.
- Establish a baseline to evaluate pipeline emergency response preparedness in Georgia.

- Identify weaknesses in existing regulatory and emergency response programs and develop solutions. The team identified the weaknesses by examining the following items:
 - The applicable pipeline safety regulations and how operators are complying with those regulations
 - Roles and responsibilities of all stakeholders
 - Resources available to assist stakeholders and emergency responders during pipeline incidents
 - Current training programs for emergency responders in Georgia
- Develop a sustainable comprehensive pipeline emergency response training program that will enhance the capabilities of emergency responders in Georgia. This program represents a public-private partnership among emergency responders, pipeline operators and regulators. The result leverages the training expertise and organization of the GPSTC, the command and communication structure of the GAFC, and the expertise of pipeline operators, within a framework that meets the requirements of federal and state laws and regulations for emergency responder outreach.

While this effort is tailored to Georgia needs and circumstances, the Georgia Pipeline Emergency Response Initiative (GEPRI) can serve as a model that can be adapted for use in other states. A list of acronyms and definitions used in this report is provided in Appendix C.

II. BACKGROUND

A. Georgia Demographics

The state of Georgia proved to be an ideal location for the development of a pipeline emergency response initiative for the following reasons:

- Georgia has a well-established and successful 811 call system.
- Georgia has an active and effective state-level damage prevention program.
- There is a good mix of interstate hazardous liquid and natural gas pipeline operators, as well as public and private natural gas local distribution companies (LDCs) in Georgia.
- PHMSA has a long-standing, positive working relationship with Georgia emergency responders and the Georgia Public Service Commission (PSC).
- PHMSA's Southern Region, the Georgia PSC, and several of the operators and emergency responders are based in the metropolitan Atlanta area, making it convenient for the steering committee to meet regularly.

Currently 92 different companies and municipalities operate more than 85,000 miles of natural gas and hazardous liquid pipelines in Georgia. These operators include large companies with interstate transmission and intrastate distribution pipelines, as well as local distribution companies that are either investor-owned or government-owned entities and that range in size from fewer than 100 customers up to 1.6 million customers. These entities operate pipelines in most of the 159 Georgia counties, which include 536 incorporated municipalities. There are 624 distinct fire departments in Georgia, representing approximately 28,000 firefighters.¹ Approximately 85 percent of those are small volunteer or paid and volunteer departments.

B. Regulatory Requirements

Under current federal Pipeline Safety Regulations, 49 CFR Parts 192 and 195, pipeline operators are required to comply with the following:²

- Have written procedures for notifying appropriate fire, police, and other public officials of gas and liquid pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency (§192.615 (a)(8) and §195.402(e)(7)).
- Establish and maintain liaison with appropriate fire, police, and other public officials to 1) learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency; 2) acquaint the officials with the operator's ability in responding to a gas pipeline emergency; 3) identify the types of gas pipeline emergencies of which the operator notifies the officials; and 4) plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property (§192.615 (c)).
- Establish and maintain liaison with fire, police, and other appropriate public officials to learn the responsibility and resources of each government organization that may respond to a hazardous liquid or carbon dioxide pipeline emergency and acquaint the officials with the operators ability in responding to a hazardous liquid or carbon dioxide pipeline emergency and means of communication (§195.402 (c)(12)).

In June 2004, the U.S. Department of Transportation's Research and Special Programs Administration (RSPA) and the Office of Pipeline Safety (OPS) proposed a rule that required pipeline operators to develop and implement

¹ The Georgia Pipeline Emergency Responders Initiative (GPERI) is initially focusing on the fire departments (FDs) because FDs are typically the lead agency for fires, rescues, explosions and hazardous materials emergencies. As the program moves forward, it is anticipated that the other emergency responders will be brought up to the awareness level of the FD even though their roles may be different, especially considering that the EMA, LE and dispatchers also are trained at the GPSTC.

² Note that the federal pipeline safety regulations only apply to pipeline operators. Though pipeline operators must interact with emergency responders, there are no regulatory requirements for emergency responders to interact with pipeline operators.

education programs that would comply with American Petroleum Institute (API) Recommended Practice (RP) 1162, 1st edition³. The recommended practice, developed as a consensus industry standard, was intended for use by natural gas pipeline operators, hazardous liquid pipeline operators, operators of gathering lines, and local distribution companies.

The final rules (49 CFR 192.616 and 195.440), implemented in June 2005, require pipeline operators to develop and implement education programs that address key stakeholder audiences, including emergency responders. The rules also describe the types of messages appropriate for each audience, outline message frequency and delivery methods, and provide mechanisms for continuous program improvement. These requirements are in addition to existing emergency plan rules (49 CFR 192.615 and 195.402) that require pipeline operators to establish and liaison with appropriate fire, police, and other public officials.

The federal government is primarily responsible for developing, issuing, and enforcing pipeline safety regulations. However, the pipeline safety statutes allow states to take responsibility for *intrastate* regulatory, inspection, and enforcement under an annual certification by PHMSA. To qualify for certification, a state must adopt the minimum federal regulations, but states can adopt additional or more stringent requirements as long as they are not contrary to federal regulations. A state also must provide for injunctive and monetary sanctions substantially the same as those authorized by the federal pipeline safety statutes. The Facilities Protection Unit of the GAPSC has been certified by PHMSA to inspect and enforce the pipeline safety regulations for intrastate natural gas pipeline operators in Georgia.

In March 2008, the state of Georgia implemented the Countywide Safety Plan Rule (CWSP). This rule was the result of the expansion of natural gas distribution companies in Georgia and the associated overlap in jurisdictional boundaries. For example, there are eight local distribution companies (LDCs) and two interstate pipeline companies operating in one Georgia county. To help alleviate confusion and manage safety issues associated with potential overlap, the CWSP establishes safety-based boundaries within Georgia. The CWSP currently requires plans for 63 counties where there is more than one LDC. The rule also requires additional education for emergency responders beyond API RP 1162 requirements in order to ensure the appropriate pipeline operator is notified in the event of an emergency. While the CWSP is still being implemented in certain counties of the state, to date it has proved effective in reducing confusion caused by jurisdictional overlap.

³Note that OPS was under RSPA until November 30, 2004, when legislation creating PHMSA was signed into law and only the 1st edition of API RP 1162 can be used to meet regulatory requirements.

C. Fire Management Roles

As the executive officer of their respective agencies, Fire Chiefs are assigned the responsibility of ensuring as safe an environment as possible for emergency responders under their command. This includes sharing information about pipeline emergencies. This exchange must be both internal (within their agency) and external (with other agencies, pipeline operators and the public). Chief Officers have an obligation to know if pipeline facilities exist within their respective territories and the adjoining jurisdictions in which they have automatic or mutual aid agreements, understand the associated hazards, and have emergency response procedures to address those risks.

III. EXISTING CHALLENGES

The Committee began by identifying the challenges and weaknesses inherent in existing firefighter training and pipeline safety programs in Georgia. The following list summarizes the most significant issues identified:

A. Lack of Sustainable Training for First Responders

Historically, the lack of sustainable pipeline emergencies training in Georgia has resulted in less than optimal responses when natural gas emergencies have occurred. In particular, fire fighters have been known to squeeze off natural gas distribution pipelines even though they were not authorized to do so. Pipeline operators have provided guidance on the proper response to these types of incidents through a variety of methods (e.g., face to face, pipeline group meetings, emails, etc.), but to date, such approaches have been marginally effective.

The establishment of sustainable training also would benefit the E-911 dispatchers who receive initial notifications about pipeline emergencies and provide initial direction to callers. Without training on pipeline hazards and risks, dispatchers may not be able to provide accurate safety guidance. A significant pipeline incident that happened several years ago causing fatalities and injuries, illustrates this point. A dispatcher may have missed an opportunity to instruct a caller to evacuate because the dispatcher did not understand the potential risks.

The lack of a sustainable comprehensive training program for pipeline emergencies to address the exchange of this type of information is arguably the most important aspect of this proposal.

B. Lack of Priority Placed on Pipeline Emergency Response Training

While pipeline operators and emergency responders recognize that the consequences of large-scale pipeline emergencies can be significant, fire

departments historically have not viewed these low frequency events as a high priority for training. Hazardous materials training includes pipeline emergencies, but in a limited way. A higher priority for pipeline emergency training needs to be established for jurisdictions where pipelines are located.

C. Less than Optimal Pipeline Emergency Response Training Delivery Methods

The pipeline industry's approach has been to offer free, area-wide pipeline group meetings, where pipeline safety information is taught by an industry vendor. Unfortunately, this approach has been less than effective for the following reasons:

- The level of information that can be presented at a meeting sponsored by different operators with different products does not meet the knowledge needs of most responders.
- The time available to ask questions or interact with pipeline company representatives is limited by the pipeline group meeting structure. This does not encourage development of relationships or sharing of information.
- Attendance by career firefighters and other emergency responders at pipeline group meetings is highly dependent on their availability when the meeting is scheduled; there are few incentives to compel attendance, making current operator-sponsored "training" hit or miss.
- Volunteer fire departments (VFDs) do not always have time or resources to attend pipeline industry-sponsored training since many volunteers maintain full-time jobs. This creates a potential national vulnerability among this population of responders.

D. Challenges with Operator Emergency Responder Outreach and Liaison Programs

Generally speaking, pipeline operators direct their outreach and liaison programs to the leadership level of emergency response agencies and expect that the information will be passed along to those who need to know. This does not always occur and as a result, certain emergency personnel may not have the appropriate level of awareness.

The massive natural gas pipeline rupture in San Bruno, California, in 2010, during which eight people were killed and 38 homes destroyed, clearly illustrates this point. Following that incident, the San Bruno Fire Chief stated that he was unaware of the high-pressure gas transmission pipeline in his community. Post-incident investigation showed the pipeline operator had distributed the necessary notifications, but given the Fire Chief's testimony, the awareness effort in this case was obviously ineffective.

The Committee heard similar comments from various Fire Chiefs during the course of program development, indicating that similar gaps exist in Georgia.

E. Resource Challenges in Responding to Excavation Incidents

Damage to pipelines from excavation activities is a leading cause of significant pipeline incidents in the United States. In the 20-year period between 1993 and 2012, 22.5% of all significant pipeline incidents were the result of excavation damage, accounting for 39.4% of all fatalities and 34.5% of all injuries.

Excavation damage is also a leading cause of pipeline incidents in Georgia. More importantly, thousands of non-reportable pipeline excavation incidents occur annually in the state. These incidents create a significant risk to public safety and an ongoing drain on operator and responder resources.

The Pipeline Inspection, Enforcement, and Safety (PIPES) Act of 2006 requires excavators to call 911 if they damage a pipeline, causing a product release. This requires the dispatch of emergency responders. Preventable excavation damages tie up emergency responders such that response to other emergencies could be impacted. By increasing responder awareness of pipeline excavation damage they can be actively involved in preventing pipeline incidents.

IV. GEORGIA PIPELINE EMERGENCY RESPONDERS INITIATIVE (GPRI)

The program described in this paper is intended to address the existing challenges identified in Section III. To meet these challenges, a sustainable comprehensive training model has been developed that will enhance two-way communications between pipeline operators and emergency responders. GPRI addresses the following elements:

A. Provide Sustainable Training for First Responders

The developed comprehensive training curriculum appropriately focuses and expands upon responder knowledge of hazardous materials, fire suppression, Emergency Medical Services (EMS)/Mass Casualty Incident (MCI), disaster management and use of National Incident Management System (NIMS)/Incident Command System (ICS) during a pipeline emergency. Adjuncts to this training will include training for 911 dispatchers and other emergency responder groups. This initiative will be sustainable long-term, administered and supported by a Coalition board including members from GAFC, GPSTC, the pipeline industry and other key stakeholders. Appendix D provides a flow chart depicting the GPRI training process.

B. Place Emphasis on Pipeline Emergency Response Training

The training curriculum is designed to be administered under the umbrella of the Georgia Association of Fire Chiefs (GAFC) in association with the Georgia Public Safety Training Center (GPSTC). This structure plays a significant role in encouraging Fire Chiefs and other emergency responders across the state to participate in the program.

C. Establish Alternative Pipeline Emergency Response Training Delivery Methods

Transferring responsibility for pipeline emergency training from pipeline operators to fire-based training services through GAFC and GPSTC enhances program credibility and maximizes participation by emergency responders. This transfer recognizes the specific knowledge needs of each responder, eliminating a one-size-fits-all approach to training.

D. Enhance Operator Emergency Responder Outreach and Liaison Programs

The partnership created by this program encourages two-way communications among emergency responders and pipeline operators. Operators will continue to provide emergency responders with information on pipeline emergencies, but because of the partnership created by this program, emergency responder leadership will be more receptive and aware of its importance. By leveraging the influence of Fire Chiefs, responders will be more likely to share relevant information about their capabilities, availabilities and emergency response resources. Operators also benefit from existing firefighter training, testing and documentation programs already in place.

E. Promoting Responder Awareness of Their Role in Reducing Excavation Damage Incidents

As part of this training program, emergency responders will be educated on Georgia's one-call system (GA 811) and the state's damage prevention program, including identifying potential indications of 811 non-compliance. The training also will encourage emergency responders to engage other local government agencies with responsibilities for excavation activities (e.g. city permitting and planning agencies, etc.) to help prevent excavation damage to underground utilities, including pipelines. Increasing the number of people reporting potential unauthorized excavation will serve as a deterrent to potential offenders and reduce damage incidents, resulting in fewer responses and less stand-by time for emergency responders.

V. THE PROGRAM

A. Program Design

In evaluating options for improving training, cooperation and communication, it became apparent to the Steering Committee that the industry's "outside-in" education approach was not very effective. Although the pipeline industry has had some success with vendor-hosted training programs that meet regulatory requirements, the value and quality of this approach has diminished over time. One of the primary considerations was the need to develop a training system that would garner firefighter respect and ensure that pipeline safety training was recognized as a critical training topic. This could be accomplished by using the same organizations that train responders on the other aspects of their job.

In Georgia, GPSTC coordinates emergency responder training at the state level. Using this organization to help conduct pipeline safety training has obvious benefits:

- The GPSTC is the qualifying agency for curriculum used by firefighters, emergency management, police and 911 dispatchers for certifications and continuing education in the state of Georgia. As such, the agency and its trainers have immediate credibility among the emergency responder audience.
- The GPSTC has an established structure for training and testing individuals who take courses offered through its system. This provides pipeline operators the opportunity to more completely identify the emergency responder audience, to leverage an already developed scheduling and documentation system, and through testing, provides an improved means by which to measure the effectiveness of message penetration, as required by API RP 1162.
- Access to the GPSTC and GAFC communication systems gives pipeline operators a set of established tools for communicating pipeline safety information (e.g. 811-day messages were sent to all Fire Chiefs in Georgia in 2013), as well as a means to more effectively share pipeline safety best practices and lessons learned.
- Although a pipeline safety course is not currently "required" in the Georgia firefighter curriculum, by partnering with the GPSTC and the GAFC, the Georgia pipeline operators gain powerful partners for promoting course attendance. The ability of these groups to market and distribute this course to their own personnel through established organizational and command structures far outweighs any influence a pipeline operator might have working from the "outside-in."

In determining the course content, the Coalition worked closely with the GPSTC and GAFC to develop an emergency response training curriculum.

The Pipeline Emergencies, Second Edition course, a 16-hour course authored by the National Association of State Fire Marshals (NASFM) and sponsored by PHMSA, was used as the basis for developing this curriculum.

The content is presented through GPSTC's hazardous materials training program, which is an established part of the emergency responder curriculum. In developing course material, the Coalition relied heavily on the guidance provided by the GPSTC and their experience in delivering content applicable to the various positions within the firefighter audience. Accordingly, at least five modules are planned for responders based on positional knowledge needs, rank, and responsibility:

1. **Command Module** - A four-hour training program for Chief Officers

This training is intended for chief officers to provide strategic awareness. The module will focus on the use of NIMS and ICS, unified command with pipeline operators, use of an EOC, the need for an Incident Action Plan and pre-planning emergencies through joint training sessions. The need for fire department participation in prevention measures also will be emphasized.

In jurisdictions where pipelines exist, the training provides Chief Officers with basic pipeline information, including the number of pipelines, physical locations, and the types of hazardous materials transported. Because Chiefs are responsible for ensuring the safety of the public, their staff and the environment, they must ensure that this information is incorporated in their local governmental emergency response plans.

2. **Company Officer and Firefighter Module** - An eight-hour training program for Company Officers and Firefighters

This training is intended to educate officers and their crews at the company level (i.e. single resource). This module is focused on scene safety, addressing initial incident command, quality of size-up, prompt notification of pipeline operator, assistance requests and numerous tactical objectives. Emphasis is placed on prompt ordering of additional resources (i.e. over respond) in preparation for transfer of incident command to Chief Officers.

3. **Train-the-Trainer Module** - A 16-hour, train-the-trainer program for instructors and training officers.

This course is offered twice a year at the GPSTC campus in Forsyth, GA, for the cadre of field instructors who will deliver the module-style training across the state.

4. **Pipeline Emergencies Course, Second Edition** - The full 16-hour training program (for fire service personnel desiring a more in-depth understanding of the subject matter).

This course is offered four times a year at the GPSTC campus in Forsyth, GA.

5. **911 Dispatch Module** - A four-hour training program for 911 operators. This module, yet to be developed, will educate dispatch personnel about hazardous material pipelines in their jurisdiction, specific product risks and hazards, the right questions to ask when a potential pipeline emergency is reported, and the appropriate information to communicate to emergency crews and pipeline operators.

By using a modular approach to training, responders at all levels will have the knowledge and skills appropriate to their emergency response role(s).

Additionally, the use of GPSTC to provide pipeline emergencies training has a secondary benefit toward the integration of pipeline emergencies content into broader emergency responder curricula. Fire service training is unique in that it is standard based in many areas. Those standards are published by the National Fire Protection Association (NFPA) and are revised on a four to five year cycle. Benchmarks established by existing training programs (e.g., lessons learned and best practices) are often incorporated in future standards, and revised when needed.

GPSTC already has initiated discussions to incorporate pipeline related training objectives into existing standards. These standards will have several levels of training, from initial training to the hazardous materials training taken by all firefighters as part of their career (or volunteer) progression.

Much like the history of hazardous materials training that began in earnest in 1986 and the incident command/NIMS training that was driven nationally in 2004; pipeline emergencies training will likely expand into other public safety disciplines such as EMS and law enforcement.

B. Delivery Methods

GPERI will use multiple delivery methods in accordance with established GPSTC training practices:

- Classroom presentations by fire academy trainers at the GPSTC facility in Forsyth, GA.

- Presentations at local training centers provided by department training officers for those agencies with in-house training capabilities.
- Presentations by GAFC qualified trainers at regional training sessions for those that do not have in-house training capabilities.
- Web-based or computer disc training (It is not recommended that this be the sole method of delivery for agencies with pipeline emergency potential).

This program is initially focused on fire departments, because these agencies are typically the lead responders for fires, rescues, explosions and hazardous materials emergencies. Going forward, GPERI will be expanded to include training modules for other critical responders (i.e., law enforcement, emergency management, etc.), commensurate with their role in pipeline emergencies. The same collaborative process, involving the GPERI Board working with GPSTC, will be used to develop additional training modules.

C. Program Governance and Administration

The Committee recognized the need to establish a formal governance structure for this program. Appendix E provides a charter created to meet this need. The charter places the initiative in the hands of an eleven-member committee of four emergency responders, four pipeline operators and three non-voting members. The committee functions under the umbrella of the GAFC which is a non-profit organization. A Program Manager, who reports directly to the GAFC, is responsible for administering the initiative. The assignment of a Program Manager attests to the commitment of Georgia's Fire Chiefs to ensure the program becomes a sustainable aspect of firefighter training. The specific responsibilities of the Program Manager are detailed below:

- Facilitate training for the estimated 624 fire departments in Georgia using a risk-based approach. The risk-based approach prioritizes training delivery based on the type and number of fire departments, pipeline presence and risk factors within each jurisdiction.
- Work with fire departments to schedule training sessions that will reach the maximum number of firefighters. To accomplish this, different organizational structures, such as multi-shift departments and paid volunteer and combination departments, will be evaluated prior to scheduling a training event.
- Coordinate training program implementation:
 - Provide incentives for emergency responders to receive training for pipeline emergencies (e.g. certifications, continuing education units, lower or no-cost training, etc.)

- Facilitate tabletop exercises involving emergency responders and pipeline operators to build working relationships.
- Enhance the fire academy's hazardous materials awareness training for pipeline emergency response and assist GPSTC in developing appropriate intervals for recertification.
- Sustain a methodology to deliver the training to emergency responders throughout the state on an on-going basis.
- Improve emergency responder effectiveness in preparing for pipeline emergencies through the use of exercises and drills.
- Facilitate required interactions among pipeline operators, GAFC, and the GPSTC to maintain the quality, consistency and continuous improvement of training.
- Coordinate with GPSTC to gather and disseminate information on training program attendance to operators and other affected stakeholders groups.
- Assist Fire Chiefs and their command staff in developing direct "face-to-face" relationships with the area pipeline operator(s) within their jurisdiction.
- Encourage fire agencies to take a more active role in working with pipeline companies to promote and implement pipeline damage prevention programs in their communities. The Georgia 811 program and Colonial Pipeline's Right-of-Way Watch program are examples of these programs.

A draft statement of work between the GAFC and Georgia pipeline operators is provided as Appendix F.

D. Training Delivery and Schedule

GPERI establishes an initial three-year cycle for delivery of pipeline emergency training to firefighters in Georgia. A number of issues were considered in establishing this time interval:

1. Effective Use of Training Resources

Because the pipeline emergencies training program is not currently a part of the Georgia fire fighter training curriculum, existing training resources are limited. Accordingly, it was necessary to prioritize initial training delivery based on relative risk.

The National Pipeline Mapping System (NPMS) was used to identify the number and types of pipelines in each fire department jurisdiction. Those jurisdictions with the largest numbers of pipeline assets within their

boundaries were given the highest priority for pipeline emergencies training delivery to ensure the greatest safety benefit. The goal is to deliver initial pipeline emergency training through GPSTC and GAFC to all fire jurisdictions within a three-year period of time.

2. API RP 1162 Emergency Responder Communication Requirements

Federal pipeline safety regulations (e.g. 49 CFR Parts 192 and 195) prescribe the “minimum” safety requirements for pipeline facilities and the transportation of natural gas and hazardous liquids. Pipeline operators are responsible for complying with these regulations in the development of individual operator outreach and communications programs.

Under 49 CFR 192.615 and 195.402, operators are required to develop emergency plans and establish written procedures to minimize the hazard resulting from a pipeline emergency. The rules require each operator to establish and maintain liaison with appropriate fire, police, and other public officials. To enhance this relationship, operators must also comply with the public awareness rules, 49 CFR 192.616 and 195.440, which require operators to follow the general program recommendations of API RP 1162 for establishing communications and providing information to emergency officials.

Communications for hazardous liquids and natural gas pipeline operators (reference API RP 1162) require an annual baseline frequency for communications with emergency officials. However, the law provides flexibility in the delivery method, allowing for 1) personal contact OR 2) targeted distribution of print materials OR 3) group meetings OR 4) telephone calls with targeted distribution of print materials. Pipeline operators have a number of options available to them to meet the annual communication requirement. In addition, API RP 1162 is a performance-based regulation that allows pipeline operators to deviate from any prescriptive requirements as long as they provide justification as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

Traditionally, in order to meet the requirements, pipeline operators have opted to use a combination of annual industry-sponsored joint pipeline group meetings followed by mailings to those who did not attend. The Steering Committee was mindful of the annual approach taken for the pipeline group meetings. However, because the law is not prescriptive in terms of how the annual communications are accomplished; the Committee concluded that a three-year training schedule does not conflict with the standard, as long as operators use a secondary means to maintain annual communications.

The Steering Committee recognizes that there is a difference between “education and/or training” and “liaison.” Education and/or training is learning or enhancing knowledge, skills or behaviors. Liaison is defined as communication or cooperation that helps to facilitate a good working relationship between people or organizations.

The program developed for this initiative is intended to serve primarily as training, but it establishes a foundation for improved liaison among pipeline operators and emergency officials. It does not, however, replace the need for individual pipeline operators to communicate company-specific information about their products, assets, risks and hazards annually to emergency officials within their footprint.

A three-year interval for training delivery can be justified by course content, which is more detailed than the information covered in traditional pipeline group meetings that average only two hours in length. By contrast, the training developed for Georgia responders is designed as 4, 8, or 16-hour modules. The depth of information, coupled with a GPSTC requirement to test student understanding, provides a much higher level of assurance that pipeline safety information will be received and understood.

To further demonstrate the validity of this proposition, the Steering Committee has conducted pre-training surveys of firefighters and Fire Chiefs to determine a baseline of knowledge about pipelines and pipeline safety. The survey results will be compared to post-training test results to provide confirmation that the training program is effective in improving the ability of Georgia’s emergency responders to manage pipeline emergencies, while proving no less protective to the public safety than historically accepted approaches.

E. Program Funding

The training program described in this document is currently operating with funds obtained from a pipeline safety settlement approved by the Georgia Public Service Commission. These funds were provided to the GAFC to improve firefighter response to pipeline emergencies. More specifically, they have been used to fund the development of the GPERI curriculum by the GPSTC, to hire a Program Administrator, and to preview the 16-hour course with firefighters at the training center.

The plan is to secure a consistent annual funding source for the training program primarily from participating Georgia pipeline operators. This funding may be supplemented periodically by grant and/or settlement funds, although the program will be financially sustainable only if there is a stable source of funds through operator contributions. The funding model for the GEPRI is provided in Appendix G.

To ensure the effective and efficient execution of this program on an ongoing basis from both an operational and funding perspective, the plan envisions a multi-stakeholder Board under the umbrella of the GAFC.

VI. PREVENTING PIPELINE EMERGENCIES

It should come as no surprise that in working with fire protection agencies, an effort that began as a means to enhance pipeline emergency response quickly expanded into an equal effort to prevent pipeline emergencies. Beyond reviewing and editing the Pipeline Emergencies, Second Edition course, the Steering Committee spent a fair amount of time discussing how Georgia firefighters can help support pipeline damage prevention.

As noted previously in this document, federal law requires excavators to contact 911 every time pipeline excavation damage results in a release. The requirement to respond to preventable excavation damages can strain local fire department resources such that responses to other emergencies could be delayed.

The Georgia Utility Facilities Protection Act, OCGA, Title 25, Chapter 9, describes requirements for mechanized excavation within the state. Jurisdiction and enforcement of Chapter 9 is specifically delegated to the GPSC. However, any person, including emergency responders, can report possible 811 non-compliance to the GPSC.

GPRI is designed to teach firefighters how to recognize potential evidence of unauthorized excavation, empower them to stop and question excavation crews, and report non-compliance to the GPSC. By leveraging the fire prevention culture and the leadership roles firefighters have within the community, the program has expanded from its original mission of emergency response, to an even more inclusive mission that encourages damage prevention. This benefits all parties:

- Pipeline operators gain an expanded damage prevention presence in the community;
- Fire departments make the best use of their limited personnel and funding;
- Regulators have direct evidence of the effectiveness of pipeline awareness programs; and
- Public safety is enhanced.

VII. NEXT STEPS

As of September 1, 2013, the GPSTC had piloted the 16-hour training program several times with firefighters. These initial offerings tested firefighter level of understanding and enabled training materials to be adjusted based on participant input. The Steering Committee currently anticipates some minor changes to certain aspects of the course curriculum in accordance with these initial training trials.

Going forward, the “big picture” goal is to expand this training to include other involved public safety agencies such as law enforcement and emergency management.

Additional program phases could provide pipeline emergency response training for city, county and state law enforcement personnel, emergency managers, community planners, code enforcement officers, building inspectors, local emergency planning committees (LEPCs), etc. From a prevention perspective, this gets more “eyes in the field” to help prevent pipeline emergencies by watching for excavation activity.

The use of technology may also expand training delivery (webinars, computer based training, etc.) and the exchange of information (best practices, lessons learned, pipeline facility data, etc.) among operators and emergency responders.

VIII. CONCLUSION

When the Georgia Pipeline Operator and Emergency Responder Coalition was formed in May 2012, none of the individuals who volunteered to serve on the Steering Committee could have predicted the progress this group would make. In a little over a year, individuals representing eight unique agencies or companies, all with individual concerns and interests, worked together to develop this emergency responder training program for Georgia. The ease with which this effort is being accomplished is a testimony to the dedication and sincerity of the individuals serving on this committee to put aside individual agendas in the interest of creating a program that improves public safety.

One of the pipeline industry’s greatest historical challenges has been to “get the attention” of responders about the importance of pipeline emergency response in an environment of competing issues. Although pipeline operators have spent significant time and resources to develop pipeline safety programs, their efforts have not been particularly successful in ensuring responders get the information they need to safely assess, respond to and manage pipeline emergencies.

The program described in this document resolves this challenge by involving emergency responders in developing solutions to the problem. By working together, pipeline operators in Georgia gained a powerful partner in advancing pipeline emergency responder training. The use of state-approved training facilities

and personnel under an organization and command structure that is familiar to emergency responders creates a path for success that has not existed previously.

The opportunity for Georgia emergency responders to work closely with pipeline operators also has helped to demystify pipeline operations and improved responder understanding of the value of pipeline emergencies training for their personnel. The program design requires pipeline operators to fund this training through the GAFC, ensuring the program remains an active part of emergency responder training going forward.

Although the success of an “inside-out” pipeline training model has yet to be conclusively proven, the relationship among firefighters, pipeline operators and regulators within the state has been enhanced significantly by this effort, and the initial results look quite promising. This kind of partnership can only lead to enhanced preparedness and improved management of pipeline emergencies throughout the state.

**APPENDIX A
STEERING COMMITTEE MEMBERS**

Georgia Emergency Response Agencies

Name	Company Name	Representing
Chief David Wall	Georgia Public Safety Training Center	GA State Fire Academy
Chief Jackie Gibbs	Marietta Fire Department	GA City Fire Departments/GAFC
Chief Jack McElfish	Sandy Springs Fire Department	GA City Fire Departments
Chief Doug Brown	Georgia Association of Fire Chiefs	KM4FS Consulting/GAFC
Chief Daryl Smith	Sandy Springs Fire Department	GA City Career Fire Departments
Chief Craig Tully	Colquitt-Miller County Fire Department	GA Volunteer Fire Departments
Chief Robert Singletary	Warner Robins Fire Department	GA Fire Departments/GAFC
State Safety Officer Mark Munns	Georgia Forestry Commission	GA Forestry Service
District Safety Officer Jeff Kenerly	Georgia Forestry Commission	GA Forestry Service
LEPC Coordinator Christina Garrard	Georgia Emergency Management Agency/Homeland Security	GA Emergency Management

Georgia Pipeline Companies

Name	Company Name	Representing
Gentry Wade	City of Buford	Natural Gas Local Distribution Companies (Municipal-owned)
Rick Lonn	AGL Resources	Natural Gas Distribution Company (Municipal-owned)
Jacob Ziliak	AGL Resources	Natural Gas Distribution Company (Municipal-owned)
Dona Harrington-Burns	Colonial Pipeline Company	Refined Liquids Transmission Pipelines
Richard Calmes	Dixie Pipeline/Enterprise	Highly Volatile Liquids Pipelines
Gregg Hammond	Williams Pipeline/Transco	Natural Gas Transmission Pipelines
Dave Williams	Williams Pipeline/Transco	Natural Gas Transmission Pipelines
Larry Hjalmarson (retired)	Williams Pipeline/Transco	Natural Gas Transmission Pipelines

State and Federal Regulators

Name	Company Name	Representing
Michael Khayata	PHMSA	U.S. DOT Pipeline/Hazardous Material Enforcement
Arthur Buff	PHMSA	U.S. DOT Pipeline/Hazardous Material Enforcement
Jason Allen	GA Office of State Fire Marshal	GA Office of Insurance and Safety Fire Commissioner
Chief Dwayne Garriss	GA Office of State Fire Marshal	GA Office of Insurance and Safety Fire Commissioner
Jeff Baggett	GA Public Service Commission	GA Pipeline Safety Enforcement
Chris Swann	GA Public Service Commission	GA Pipeline safety Enforcement

APPENDIX B STAKEHOLDER GROUPS

PHMSA, Office of Pipeline Safety (OPS) – OPS is a federal regulatory agency responsible for pipeline safety. Its mission is to ensure the safe, reliable and environmentally sound operation of the nation’s pipeline transportation system.

GPSC, Facilities Protection Unit (FPU) – The FPU is comprised of the Office of Pipeline Safety and the Georgia Utility Facility Protection Act (GUFPA) office. The Office of Pipeline Safety is responsible for providing inspection and enforcement for compliance with the regulations governing the minimum federal safety standards, state laws, and commission rules pertaining to the safe installation and operation of intrastate natural gas pipelines and hazardous gas operations. The GUFPA office is responsible for enforcing state laws and commission rules pertaining to the protection of buried utility facility infrastructure and call before you dig requirements.

GPSTC, the Georgia Public Safety Training Center – Located in Forsyth, GA, the GPSTC is a comprehensive training complex used by all state and local public safety-related units of government within Georgia. The main focus of the GPSTC is providing the best public safety training possible.

Emergency Responders - In Georgia, emergency responders include emergency management agencies (EMA), emergency medical service (EMS), fire departments (FD), and law enforcement (LE). Emergency responders are responsible for safeguarding the public and protecting property before, during and after an emergency.

Pipeline Operators –This includes privately or publically held hazardous liquid and natural gas pipeline operators with assets located within or crossing through the state of Georgia.

Georgia Municipal Association (Gas Section) – These are 82 municipally owned natural gas systems in Georgia, representing approximately 22% of the state’s natural gas lines.

Local Public Officials – This includes local, city, county and state officials and/or their staffs having land use and street/road jurisdiction along pipeline routes. Public officials are responsible for being aware of natural gas and hazardous liquid pipelines in their communities, the agencies that regulate these pipelines, the state one-call regulations, and the available resources to respond effectively to a pipeline emergency.

Affected Public – This group includes people who live, work or travel near areas where pipelines are located, customers of gas distribution facilities, and places where people congregate, such as schools, playgrounds, places of worship, etc. The affected public should be aware of the hazards associated with natural gas and hazardous liquid pipelines, know how to identify potential releases, and know whom to call in case of a potential release. (If it is an emergency, the call is to 911; if it is an encroachment issue, the call would be to 811).

Excavators – Commercial businesses and government agencies involved in any form of excavation activities comprise the excavator stakeholder group. Excavators must notify one-call centers prior to beginning excavation activities, obey the pipeline operator's markings, notify the pipeline operator if a pipeline is damaged, and call 911 immediately if gas or hazardous liquids are released.

Georgia Emergency Management Agency/Office of Homeland Security -

GEMA/OHS is the lead state coordination agency for response to and recovery from natural disasters, emergency situations, special events and threats or acts of terrorism whenever an event is of such a magnitude that local authorities are unable to address the issue adequately or during events of national significance that require state level involvement. In addition to providing coordination, GEMA operates a statewide emergency communications center, provides a certified training program, administers federal programs, and supports community disaster preparedness, mitigation, and recovery.

APPENDIX C ACRONYMS & DEFINITIONS

ACRONYMS

AGL	Atlanta Gas Light
API	American Petroleum Institute
CDT	Computer Disc Training
CFR	Code of Federal Regulations
CWSP	County Wide Safety Plan
DOT	Department of Transportation
EMA	Emergency Management Agency
EMS	Emergency Medical Service
FD	Fire Department
FF	Fire Fighter
FPU	Facility Protection Unit
GAFC	Georgia Association of Fire Chiefs
GEMA	Georgia Emergency Management Agency
GFC	Georgia Forestry Commission
GPERI	Georgia Pipeline Emergency Responders Initiative
GAPSC	Georgia Public Service Commission
GPSTC	Georgia Public Safety Training Center
GSFFA	Georgia State Fire Fighters Association
GUFPA	Georgia Utility Facility Protection Act
LDC	Local Distribution Companies
LE	Law Enforcement
NASFM	National Association of State Fire Marshalls
NPMS	National Pipeline Mapping System
OCGA	Official Code of Georgia Annotated
OHS	Office of Homeland Security
OMB	Office of Management and Budget
OPS	Office of Pipeline Safety
PAPA	Pipeline Association for Public Awareness
PHMSA	Pipeline and Hazardous Materials Safety Administration
PIPES	Pipeline Inspection, Protection, Enforcement and Safety
RP	Recommended Practice
RSPA	Research and Special Programs Administration
USC	United States Code
VFD	Volunteer Fire Department
WBT	Web-Based Training

DEFINITIONS

Emergency Responder – a person who has completed courses and received certification(s) in providing emergency services to ensure public health and safety.

First Responder – the first person on accident scene: the first person, e.g. an emergency medical technician or a police officer, who arrives at the scene of a disaster, accident, or life-threatening medical situation. The first responder's duties include providing medical assistance and calling other emergency caregivers to the scene.

Fire Department – a public or private organization that provides predominantly emergency firefighting and rescue services for a certain jurisdiction, which is typically a municipality, county, or fire protection district; A fire department usually contains one or more fire stations within its boundaries, and may be staffed by career firefighters, volunteer firefighters, or a combination.

Career Fire Department – a fire department where all firefighters are full-time paid employees.

Volunteer Fire Department – a fire department consisting of part-time firefighters who may or may not be paid for on-call time or firefighting duty time, but who are held to the same professional training standards and take the same examinations to advance in rank as career firefighters

Combination Fire Department – a fire department that combines full-time career firefighters with volunteers and paid-on-call members

Gas – natural gas, flammable gas, or gas which is toxic or corrosive (includes propane, propylene, butane and butylene)

Hazardous Liquid – liquid petroleum, petroleum products, or anhydrous ammonia

Petroleum – crude oil, condensate, natural gasoline, natural gas liquids, and liquefied petroleum gas

Highly Volatile liquid (HVL) – hazardous liquid which will form a vapor cloud when released to the atmosphere and which has a vapor pressure exceeding 276 kPa (40 psia) at 37.8°C (100°F)

Operator – an entity, either public or private, that engages in the transportation of gas or liquid fuels

Pipeline – all parts of those physical facilities through which gas or hazardous liquids moves in transportation, including pipe, valves, and other appurtenance attached to pipe, compressor units, metering stations, regulator stations, delivery stations, holders, fabricated assemblies and breakout tanks

Pipeline Facility – new and existing pipelines, rights-of-way, and any equipment, facility, or building used in the transportation of gas or hazardous liquids or in the treatment of gas during the course of transportation

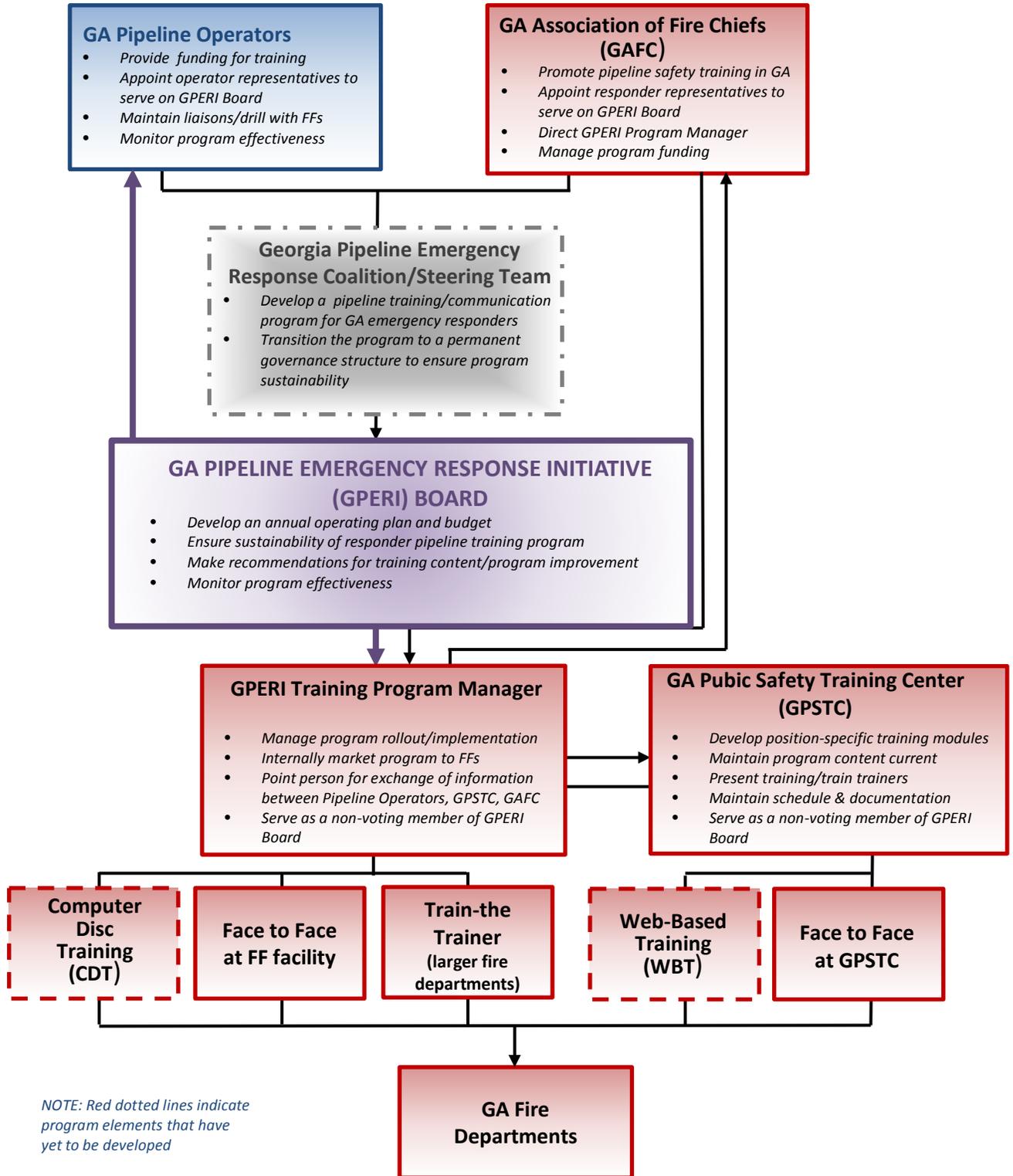
Service Line – a distribution line that transports gas from a common source of supply to an individual customer, to two adjacent or adjoining residential or small commercial customers, or to multiple residential or small commercial customers served through a meter header or manifold

Distribution Line – a pipeline that transports gas to more than two customers, operates at less than 20% of the specified minimum yield strength of the pipe, and is located downstream of a common source of supply (e.g. city gate, storage facility, etc.).

Transmission Line – a pipeline that transports gas and/or hazardous liquids from a storage facility to a distribution center, storage facility, or large volume customer, that is not downstream from a distribution center

APPENDIX D

GPERI PROCESS FLOW CHART FOR TRAINING



APPENDIX E

GEORGIA PIPELINE EMERGENCY RESPONSE INITIATIVE BOARD CHARTER

Preamble:

The mission of the Georgia Pipeline Emergency Response Initiative (“the Initiative”) is to enhance public safety in the state of Georgia by improving responses to pipeline emergencies through well-developed communication plans and training programs.

Background:

The Georgia Pipeline Operator and Emergency Responder Coalition (“the Coalition”) was founded on May 15, 2012. Coalition members included representatives from the pipeline industry, regulatory agencies, local governments, and emergency responder organizations. Owing to the dedication of its founding members to improve public safety in Georgia, the Coalition has made great strides in enhancing public safety. The Coalition now seeks to expand its efforts by forming the Initiative.

Organization:

The Initiative is now creating a Board that is responsible for creating and submitting an annual operating plan to the Georgia Association of Fire Chiefs. The Georgia Association of Fire Chiefs has the authority to review the Initiative’s annual operating budget and either approve or veto the submitted budget and revenue proposal. The GAFC board however, may not amend any submitted proposal or substitute their own.

The Initiative’s Board consists of 11 positions, 8 of which are voting positions and 3 of which are non-voting positions.

Voting Positions

- 4 emergency responder positions
- 4 pipeline industry positions
 - 1 interstate liquids pipeline (Selected by the interstate liquid pipelines from the state of GA)
 - 1 interstate natural gas pipeline (Selected by the interstate natural gas pipelines from the state of GA)
 - 1 investor-owned local distribution company (Selected between AGLC and Liberty); and
 - 1 municipal local distribution company (Selected by the Georgia Municipal Authority)

Non-Voting Positions

- Director of the Georgia Fire Academy (or his/her designee)
- President of GA811 (or his/her designee); and
- Georgia Association of Fire Chief's designated Program Manager.

The Board shall select its own chair (allowed to vote) and establish its own operating rules which shall include, at a minimum, a meeting frequency and attendance policy. A quorum of 6 voting board members is required to hold an official meeting and a minimum of 5 yes votes are required for any positive actions to be approved.

Participants:

The Initiative is open to the voluntary participation of pipeline operators in Georgia but will require execution of an agreement. The Steering Committee can and should invite appropriate regulatory, governmental agencies, or subject matter experts, as necessary to assist in the implementation and execution of the program.

Additionally, the Board shall have the right to modify its membership in the future based upon the needs of the existing program and/or any future modification of the program that encompasses or removes additional groups for training and education. This would require unanimous approval by all the voting members of the committee.

APPENDIX F PILOT PROGRAM STATEMENT OF WORK

This Statement of Work (SOW) is an agreement between participating Georgia pipeline operators and the Georgia Association of Fire Chiefs. This SOW will be effective only when approved by the GPOERC Board Committee once the Board Committee is seated. This SOW may be amended only as provided for in the Agreement.

Definitions Unless otherwise defined herein, all capitalized terms will have the meanings ascribed to them in the Business Plan.

GAFC -	Georgia Association of Fire Chiefs
GEMA -	Georgia Emergency Management Agency
GPRI -	Georgia Pipeline Emergency Responders Initiative
GPOERC –	Georgia Pipeline Operators and Emergency Responders Coalition
GPSTC –	Georgia Public Safety Training Center (Fire Academy Division)
NASFM –	National Association of State Fire Marshals
SOW –	Statement of Work

Description of Services

Overview of Project

- A. Adopt the NASFM’s “Pipeline Emergency” training curriculum in consortia with GPSTC, modify as necessary, to create shorter-length modules for target audiences that do not require the entire 16-hour course of instruction
- B. Establish and train a cadre of field instructors who will be able to provide training
- C. Expand the cadre of seven qualified field instructors to include fire departments that have their own “in-house” training capabilities
- D. Execute on the training established in bullet A above

Details of Services to be Provided

The Georgia Association of Fire Chiefs (GAFC) will perform and provide the following:

- A. Retain a Program Manager to administer the GPRI program
TARGET: Completed
- B. Take the existing sixteen (16) hour NASFM “Pipeline Emergency” course and create abbreviated modules of eight (8) and four (4) hour lengths that will provide focused and position-specific training in lieu of taking the full course.
TARGET: Courses will be created and ready to use by May 1, 2014.

- C. Expand the existing cadre of seven field instructors.
TARGET: This will take place on or before December 31, 2014.
- D. Provide a minimum of one (1) course in each of the eight (8) GAFC/GEMA Districts to help generate interest and demand for the training program.
TARGET: This will be completed by the end of 2014.
- E. Conduct at least two (2) Pipeline Emergency modules per month with a goal of twenty (20) or more students per module concentrating on priority counties and areas first.
TARGET: This will be completed between May and December 2014.
- F. Work with the eight (8) GAFC Vice Presidents in their districts using the GPERI Business Plan and other support as needed to stimulate interest of fire departments to participate and request Pipeline Emergency training.
TARGET: This will be conducted during 2014 and ongoing.
- G. Develop a comprehensive marketing plan document to assist in expanding the program beyond those pilot goals defined above.
TARGET: This will be completed by December 31, 2014.
- H. Work with the GPOERC Board Committee to establish tracking and performance metrics and the creation of acceptable data capture processes.
TARGET: This will be completed within three (3) months of the establishment of the Board Committee

APPENDIX G

PILOT PROGRAM FUNDING MODEL

The goals of the Pilot Program funding model are as follows:

1. To provide a reliable and consistent funding stream from the pipeline operators in the state of Georgia sufficient to meet the program's annual baseline operations budget.
2. To generate this funding stream from operators by a redirection of existing public education dollars currently spent on less effective methods of meeting the API RP 1162 requirements associated with emergency responders.
3. To allocate costs equitably amongst the pipeline operators in the state in the following manner.
 - a) A 50/50 allocation of costs between interstate pipeline operators and LDCs assuming full participation by the major operators in each group.
 - b) For allocation among interstate operators, a multi-tiered structure tied to the number of counties in the state of Georgia that their pipelines operate in.
 - c) For allocation among LDCs, a multi-tiered structure tied to the number of service lines for the operator.
4. Funding beyond the operator revenue listed above that can and should be pursued from other sources. Funds from these sources should not be used to offset annual baseline operations revenues provided by the operators. Rather the one time revenue streams should be used for one time or short duration projects.

GPRI Partners

