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Docket No. 41282

DOCKET# 41282
DOCUMENT# 221404

Anheuser-Busch
100 Busch Drive
PO Box 200248
Cartersville, GA 30120
DELIVERED VIA E-MAIL

RE: Inspection Report DC24-038

Dear Ms. Michelle Cooper Kelly -

Based on review of Anheuser-Busch's response, discussions with Pipeline Safety Staff and/or Operator, and/or any additional information provided for Inspection Report AT20-032, I have cleared the following Enforcement Actions:

Violation	Description	Inspection#
192.465(a)	Each pipeline that is under cathodic protection must be tested at least once each calendar year...	AT20-032
192.481(a)	Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere...	AT20-032
192.491(a)	Each operator shall maintain records or maps to show the location of cathodically protected...	AT20-032
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	AT20-032
192.731(a)	Except for rupture discs, each pressure relieving device in a compressor station must be...	AT20-032
192.709(c)	A record of each patrol, survey, inspection, and test required by subparts L and M of this...	AT20-032
191.29(b)	The information required in paragraph (a) of this section must be submitted each year, on or...	AT20-032

Any new or continuing Enforcement Action(s) not listed above will be addressed during the Operator's future inspection. No action is required by Anheuser-Busch at this time.

Please let me know if there are any questions or concerns regarding this correspondence at (404) 985-4271 or mthebert@psc.ga.gov. 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: DC24-038

OPERATOR: Anheuser-Busch

INVESTIGATOR: Daniel Clemmons

INSPECTION DATE: September 24, 2024 REPORT MAILED DATE: February 5, 2025

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

1. PURPOSE OF INSPECTION

To conduct a follow-up inspection of the Operators previously existing probable violations.

2. CONTINUING VIOLATIONS

3. CLEARED VIOLATIONS

Cleared on 9/24/2024

Violation	Description	Inspection#	Date
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	AT20-032	8/31/2020
192.465(a)	Each pipeline that is under cathodic protection must be tested at least once each calendar year...	AT20-032	8/31/2020
192.491(a)	Each operator shall maintain records or maps to show the location of cathodically protected...	AT20-032	8/31/2020
192.481(a)	Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere...	AT20-032	8/31/2020
191.29(b)	The information required in paragraph (a) of this section must be submitted each year, on or...	AT20-032	8/31/2020
192.709(c)	A record of each patrol, survey, inspection, and test required by subparts L and M of this...	AT20-032	8/31/2020
192.731(a)	Except for rupture discs, each pressure relieving device in a compressor station must be...	AT20-032	8/31/2020

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

ANHEUSER BUSCH GAS TRANSMISSION SYSTEM / FOLLOW-UP INSPECTION
INSPECTION NUMBER DC24-038 / DOCKET NUMBER 41282

On September 24, 2024, Pipeline Safety Staff conducted an inspection virtually via Team's meeting with Anheuser Busch Gas Transmission System and performed a follow-up inspection on the Operator's previously existing probable violations that were cited under AT20-032. An exit meeting was conducted on September 24, 2024.

During this investigation, the Operator was represented by:
Maya Collins – EHS Manager
Rachel George – Zone ES Director
Gene Taylor - MGAG/SRCS (Consultant)

Commission Staff was represented by Daniel Clemmons, Lead Inspector

At the time of this inspection Anheuser Busch Gas Transmission System was under seven (7) previously existing probable violations.

PROBABLE VIOLATIONS CLEARED

1. In regard to the Probable Violation of 49CFR, §192.465(a) which was cited in Inspection Number AT20-032; in that inspection Staff stated: "Anheuser Busch failed to perform annual testing of their cathodic protection system each calendar year not to exceed 15 months.

   FIRST OPERATOR RESPONSE: In their response letter to Inspection Number AT20-032, dated December 17, 2020, the Operator stated: "As stated in this Report, cathodic protection testing was conducted in 2019. That testing was performed as part of ABI's assessment of its overall biogas pipeline. Prior to the completion of this Inspection in October 2020, ABI did not consider the portion of its biogas pipeline outside Georgia Department of Transportation ("GDOT") right-of-way to be subject to PHMSA and GPSC jurisdiction, and ABI did not follow PHMSA regulations for cathodic protection testing of what it considered to be non-jurisdictional facilities. All of ABI's biogas pipeline facilities within GDOT right-of-way are plastic; therefore, no cathodic protection testing was necessary on the facilities that were previously considered to be jurisdictional. Now that the entire biogas pipeline has been determined to be jurisdictional, ABI will ensure that future cathodic protection testing is performed in accordance with the applicable pipeline safety regulations."

   FIRST FOLLOWUP INSPECTION: During this inspection (DC23-038), Staff reviewed the Operators response, and the documents provided by the Operator and found that it adequately addresses this violation.

   Staff determined that this violation could be cleared at this time.

2. In regard to the Probable Violation of 49CFR, §192.481(a) which was cited in Inspection Number AT20-032; in that inspection Staff stated: "Operator failed to monitor their aboveground pipeline for evidence of atmospheric corrosion once every 3 years not to exceed 39 months."

   FIRST OPERATOR RESPONSE: In their response letter to Inspection Number AT20-032, dated December 17, 2020, the Operator stated: "Prior to the completion of this Inspection in October 2020, ABI did not consider the portion of its biogas pipeline outside Georgia Department of Transportation ("GDOT") right-of-way to be subject to PHMSA and GPSC jurisdiction, and ABI did not follow PHMSA regulations for atmospheric corrosion monitoring of what it considered to be non-jurisdictional facilities. All of ABI's biogas pipeline facilities within GDOT right-of-way are plastic and are below ground; therefore, no atmospheric corrosion monitoring was necessary on the facilities

that were previously considered to be jurisdictional. Now that the entire biogas pipeline has been determined to be jurisdictional, ABI will ensure that future atmospheric corrosion monitoring is performed in accordance with the applicable pipeline safety regulations."

FIRST FOLLOWUP INSPECTION: During this inspection (DC23-038), Staff reviewed the Operators response, and the documents provided by the Operator and found that it adequately addresses this violation.

Staff determined that this violation could be cleared at this time.

3. In regard to the Probable Violation of 49CFR, §192.731(a) which was cited in Inspection Number AT20-032; in that inspection Staff stated: "Operator failed to maintain records for last 5 years as required for each patrol, survey, inspection and test required by subparts L & M."

   FIRST OPERATOR RESPONSE: In their response letter to Inspection Number AT20-032, dated December 17, 2020, the Operator stated: "By January 31, 2021, ABI will begin replacing the pressure relief valves on its biogas pipeline annually. Each year the valve taken from service will be replaced with the previous year's valve that has been inspected, adjusted, and repaired as necessary by a vendor, and then returned to ABI for use in the next year's change out."

   FIRST FOLLOWUP INSPECTION: During this inspection (DC23-038), Staff reviewed the Operators response, and the documents provided by the Operator and found that it adequately addresses this violation.

   Staff determined that this violation could be cleared at this time.

4. In regard to the Probable Violation of 49CFR, §192.709(c) which was cited in Inspection Number AT20-032; in that inspection Staff stated: "Operator failed to retain a record of each patrol, survey, inspection and test required by subparts L and M of Part 192."

   FIRST OPERATOR RESPONSE In their response letter to Inspection Number AT20-032, dated December 17, 2020, the Operator stated: "Prior to 2018, ABI was not aware that any of its biogas pipeline facilities were subject to PHMSA or GPSC jurisdiction and prior to the completion of this Inspection in October 2020, ABI did not consider the portion of its biogas pipeline outside Georgia Department of Transportation ("GDOT") right-of-way to be subject to PHMSA and GPSC jurisdiction. Therefore, ABI has not followed PHMSA recordkeeping requirements for all of the last five years. Now that jurisdictional determinations are being made, ABI will ensure that records are maintained according to applicable regulations."

   FIRST FOLLOWUP INSPECTION: During this inspection (DC23-038), Staff reviewed the Operators response, and the documents provided by the Operator and found that it adequately addresses this violation.

   Staff determined that this violation could be cleared at this time.

5. In regard to the Warning Letter, which was issued for 49CFR, §191.29(b) which was cited in Inspection Number AT20-032; in that inspection Staff stated: "Operator failed to submit annually by March 15, required information to the National Pipeline Mapping."

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number AT20-032, dated December 17, 2020, the Operator stated: "ABI began attempting to submit data to the National Pipeline Mapping System ("NPMS") in early 2020. Early submittals were not accepted due to formatting issues. In September 2020, ABI data was accepted by NPMS. ABI will ensure that future NPMS notifications and updates are submitted timely."

FIRST FOLLOWUP INSPECTION: During this inspection (DC23-038), Staff reviewed the Operators response, and the documents provided by the Operator and found that it adequately addresses this violation.

Staff determined that this violation could be cleared at this time.

6. In regard to the Warning Letter, which was issued for of 49CFR §192.491(a) which was cited in Inspection Number AT20-032; in that inspection Staff stated that: "Operator failed to maintain records or maps to show the location of their cathodically protected facilities and galvanic anodes."

   FIRST OPERATOR RESPONSE: In their response letter to Inspection Number AT20-032, dated December 17, 2020, the Operator stated: "ABI will prepare records and maps showing the location of its cathodically protected facilities and galvanic anodes by December 31, 2020 and will maintain these records and maps as required."

   FIRST FOLLOWUP INSPECTION: During this inspection (DC23-038), Staff reviewed the Operators response, and the documents provided by the Operator and found that it adequately addresses this violation.

   Staff determined that this violation could be cleared at this time.

7. In regard to the Notice of Amendment, which was issued for of 49CFR §192.605(a) which was cited in Inspection Number AT20-032; in that inspection Staff stated that: "During this inspection Staff found that the Operator had not prepared written procedures for the following:

   a. 192.605(b)(6) – Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations. Maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service.

      OBSERVED DEFICIENCY: Operator failed to prepare written procedures for maintaining their compressor station, including provisions for isolating unit or sections of pipe and for purging before returning to service.

      FIRST OPERATOR RESPONSE: In their response letter to Inspection Number AT20-032, dated December 17, 2020, the Operator stated: "In accordance with sections IA2 and IIC3 of the Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC's Pipeline Safety Director, ABI wishes to contest this NOA on the basis that the biogas compressor station may not be subject to PHMSA jurisdiction. As discussed with GPSC Staff prior to this Report's being filed, ABI understands that GPSC Staff is amenable to ABI's submitting a Request for Interpretation to PHMSA. Pursuant to this

understanding, ABI will provide a draft of its Request to Staff by January 31, 2021, for review, comment, and discussion; after which, ABI will submit the Request.

Meanwhile, ABI will continue to operate and maintain its biogas compressors in accordance with manufacturer's recommendations."

FIRST FOLLOWUP INSPECTION: During this inspection (DC23-038), Staff reviewed a response letter from PHMSA to Anheuser Busch LLC dated March 20, 2023. In that interpretation PHMSA stated: "PHMSA received a flow diagram of the biogas compressors from GPSC and agrees with you that the compressors are not regulated because the pipeline pressure downstream of the compressor is controlled from overpressure."

Based on this correspondence Staff is withdrawing this notice of probable violation.

Staff determined that this violation could be cleared at this time.

b. 192.605(b)(7) – Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations. Starting, operating and shutting down gas compressor units.

OBSERVED DEFICIENCY: Operator failed to prepare written procedures for starting, operating and shutting down gas compressor unit.

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number AT20-032, dated December 17, 2020, the Operator stated: "In accordance with sections IA2 and IIC3 of the Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC's Pipeline Safety Director, ABI wishes to contest this NOA on the basis that the biogas compressor station may not be subject to PHMSA jurisdiction. As discussed with GPSC Staff prior to this Report's being filed, ABI understands that GPSC Staff is amenable to ABI's submitting a Request for Interpretation to PHMSA. Pursuant to this understanding, ABI will provide a draft of its Request to Staff by January 31, 2021, for review, comment, and discussion; after which, ABI will submit the Request.

Meanwhile, ABI will continue to start, operate, and shut down its biogas compressors in accordance with manufacturer's recommendations."

FIRST FOLLOWUP INSPECTION: During this inspection (DC23-038), Staff reviewed a response letter from PHMSA to Anheuser Busch LLC dated March 20, 2023. In that interpretation PHMSA stated: "PHMSA received a flow diagram of the biogas compressors from GPSC and agrees with you that the compressors are not regulated because the pipeline pressure downstream of the compressor is controlled from overpressure."

Based on this correspondence Staff is withdrawing this notice of probable violation.

Staff determined that this violation could be cleared at this time.

c. §192.731(a) - Except for rupture discs, each pressure relieving device in a compressor station must be inspected and tested in accordance with §§192.739 and 192.743 and must be operated periodically to determine that it opens at the correct set pressure.

OBSERVED DEFICIENCY: Operator failed to prepare written procedures for inspecting and testing relief device in their compressor station in accordance with §§ 192.739 and 192.743.

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number AT20-032, dated December 17, 2020, the Operator stated: "By January 15, 2021, ABI will revise its procedures to accurately describe its process for annual change out and inspection, adjustment, and repair if necessary, of the pressure relief valve on its biogas pipeline."

FIRST FOLLOWUP INSPECTION: During this inspection (DC23-038), Staff reviewed the Operators response, and the documents provided by the Operator and found that it adequately addresses this violation.

Staff determined that this violation could be cleared at this time.

d. 192.731(c) – Each remote-control shutdown device must be inspected and tested at intervals not exceeding 15 months, but at least once each calendar year, to determine that it functions properly.

OBSERVED DEFICIENCY: Operator failed to prepare written procedures for its remote-control shutdown device to be inspected and tested at intervals not exceeding 15 months, but at least once each calendar year, to determine that it functions properly.

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number AT20-032, dated December 17, 2020, the Operator stated: "In accordance with sections IA2 and IIC3 of the Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC's Pipeline Safety Director, ABI wishes to contest this NOA on the basis that the biogas compressor station may not be subject to PHMSA jurisdiction. As discussed with GPSC Staff prior to this Report's being filed, ABI understands that GPSC Staff is amenable to ABI's submitting a Request for Interpretation to PHMSA. Pursuant to this understanding, ABI will provide a draft of its Request to Staff by January 31, 2021, for review, comment, and discussion; after which, ABI will submit the Request.

Meanwhile, ABI will continue to inspect and test its remote control shutdown device in accordance with manufacturer's recommendations."

FIRST FOLLOWUP INSPECTION: During this inspection (DC23-038), Staff reviewed a response letter from PHMSA to Anheuser Busch LLC dated March 20, 2023. In that interpretation PHMSA stated: "PHMSA received a flow diagram of the biogas compressors from GPSC and agrees with you that the compressors are not regulated because the pipeline pressure downstream of the compressor is controlled from overpressure."

Based on this correspondence Staff is withdrawing this notice of probable violation.

Staff determined that this violation could be cleared at this time.

e. 192.736(b) – Except when shutdown of the system is necessary for maintenance under paragraph (c) of this section, each gas detection and alarm system required by this section must-
   (1) Continuously monitor the compressor building for a concentration of gas in air of not more than 25 percent of the lower explosive limit; and
   (2) If that concentration of gas is detected, warn persons about to enter the building and persons inside the building of the danger.

OBSERVED DEFICIENCY: Operator failed to prepare written procedures for the continuous monitoring of the compressor building for a concentration of gas in air of not more than 25 percent of the lower explosive limit; and if that concentration of gas is detected, warn persons about to enter the building and persons inside the building of the danger.

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number AT20-032, dated December 17, 2020, the Operator stated: "In accordance with sections IA2 and IIC3 of the Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC's Pipeline Safety Director, ABI wishes to contest this NOA on the basis that the biogas compressor station may not be subject to PHMSA jurisdiction. As discussed with GPSC Staff prior to this Report's being filed, ABI understands that GPSC Staff is amenable to ABI's submitting a Request for Interpretation to PHMSA. Pursuant to this understanding, ABI will provide a draft of its Request to Staff by January 31, 2021, for review, comment, and discussion; after which, ABI will submit the Request.

Meanwhile, ABI will continue to monitor its compressor building for the presence of gas in accordance with manufacturer's recommendations."

FIRST FOLLOWUP INSPECTION: During this inspection (DC23-038), Staff reviewed a response letter from PHMSA to Anheuser Busch LLC dated March 20, 2023. In that interpretation PHMSA stated: "PHMSA received a flow diagram of the biogas compressors from GPSC and agrees with you that the compressors are not regulated because the pipeline pressure downstream of the compressor is controlled from overpressure."

Based on this correspondence Staff is withdrawing this notice of probable violation.

Staff determined that this violation could be cleared at this time.

f. 192.736(c) – Each gas detection and alarm system required by this section must be maintained to function properly. The maintenance must include performance tests.

OBSERVED DEFICIENCY: Operator failed to prepare written procedures for maintaining their gas detection and alarm system in the compressor building required by this section. This maintenance procedure must include performance tests.

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number AT20-032, dated December 17, 2020, the Operator stated: "In accordance with sections IA2 and IIC3 of the Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC's Pipeline Safety Director, ABI wishes to contest this NOA on the basis that the biogas compressor station may not be subject to PHMSA jurisdiction. As discussed with GPSC Staff prior to this Report's being filed, ABI understands that GPSC Staff is amenable to ABI's submitting a Request for Interpretation to PHMSA. Pursuant to this understanding, ABI will provide a draft of its Request to Staff by January 31, 2021, for review, comment, and discussion; after which, ABI will submit the Request.

Meanwhile, ABI will continue to maintain its gas detection and alarm system in accordance with manufacturer's recommendations."

FIRST FOLLOWUP INSPECTION: During this inspection (DC23-038), Staff reviewed a response letter from PHMSA to Anheuser Busch LLC dated March 20, 2023. In that interpretation PHMSA stated: "PHMSA received a flow diagram of the biogas compressors from GPSC and agrees with

you that the compressors are not regulated because the pipeline pressure downstream of the compressor is controlled from overpressure."

Based on this correspondence Staff is withdrawing this notice of probable violation.

Staff determined that this violation could be cleared at this time.

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.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

IN THE MATTER OF:	)	
	)	
Anheuser-Busch	)	**DOCKET NO. 41282**
	)	
	)	
	)	

CERTIFICATE OF SERVICE

I, do hereby certify that I have this day served a copy of the within and foregoing document on the following persons via email or United States Mail as follows:

*Sallie Tanner, Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334

*Michelle Cooper Kelly, Sr. Resident Manager
Anheuser-Busch
100 Busch Drive
PO Box 200248
Cartersville, GA 30120
michelle.kelly@anheuser-busch.com

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

Respectfully Submitted this 12th day of February 2025:

Cathy Nesbitt

Cathy Nesbitt, Administrative Assistant
Georgia Public Service Commission
Facilities Protection Unit
244 Washington Street, SW
Atlanta, GA 30334