



10 Peachtree PL NE  
9th Floor  
Atlanta, GA 30309

[chattanoogagas.com](http://chattanoogagas.com)

Dear Emergency Responder:

As you are aware, Chattanooga Gas is responsible for safely operating and maintaining its natural gas infrastructure in the communities we serve. We recognize the importance of having a strong relationship with emergency responders and look forward to proactively collaborating with you as we continue to deliver safe and reliable natural gas.

Each year, we send important safety communications, offer training and meet with emergency response officials to share information and discuss natural gas incident response and safety. In addition, federal pipeline safety regulations outline specific messages that all pipeline infrastructure companies must communicate to emergency responders.

Included with this letter is a brochure that provides important messages about keeping the community and natural gas facilities safe, as well as a map of our service territory in your area. Please read and share this information with your staff and keep it available as a reference tool.

If you haven't already met our local operations personnel in your area, we encourage you to reach out to them. They would be happy to get to know you and your team to answer any questions you may have.

**To contact us in an emergency, call 855.874.9690. Please restrict use of this number as it is only to be used by emergency response personnel.**

For **non-emergencies**, if you would like additional information visit [chattanoogagas.com](http://chattanoogagas.com) or if you have questions and would like to speak to someone from our safety group, please call the appropriate person listed below..

➤ Fire and emergency response issues or training:

– **Tommy Sipsy**, Chief Investigator

**404.606.6900**

➤ Law enforcement or security issues:

– **Charlie Mangan**, Director of Corporate Security

**404.386.3786**

Sincerely,

A handwritten signature in black ink, appearing to read "R L L", written in a cursive style.

Richard Lon  
Managing Director, Regulatory Compliance

*\* Please see the reverse side of this letter for important information about our Pipeline Integrity Management Plan*

# Pipeline Integrity Management Plan

Pipeline integrity management is a process for assessing and mitigating pipeline risks in an effort to reduce both the likelihood and consequences of incidents.

The Pipeline Safety Improvement Act of 2002 is a federally mandated legislation that addresses risk analysis and integrity management programs for pipeline operators. It also directs the U.S. Department of Transportation (DOT) to adopt regulations relating to integrity management. DOT finalized these regulations on December 17, 2004. Natural gas transmission pipeline operators were then required to begin conducting assessment by June 17, 2004, have a management program in place by December 17, 2004, and to complete baseline assessments of pipe in high consequence areas by 2012. We have implemented an integrity management program for pipelines in the company's high consequence areas according to the DOT regulations. It is a systematic and comprehensive process designed to provide information to effectively allocate resources to appropriate prevention, detection and mitigation activities. The program builds on the existing foundation of pipeline safety regulations covering design, construction, testing, operation and maintenance that has been in place for many years.

These are the basic steps in the integrity management process.

- **High Consequence Area (HCA) Identification** – Locations along the Pipeline System that meet the criteria for High Consequence Areas are identified. Generally, these are high population density areas or difficult to evacuate facilities, such as hospitals, prisons or schools, and locations where people congregate, such as churches, office buildings or playgrounds.
- **Threat identification and risk assessment** – Information about the pipeline segments are evaluated to identify the threats of concerns to the pipe and to assess risk.
- **Risk Analysis** – a systematic process in which potential hazards from facility operation are identified, and the likelihood and consequences of potential adverse events are estimated. Each pipeline segment is given a numerical score based on the estimated risk.
- **Regulatory Requirements** – The 107th Congress approved bill H.R. 3607 known as the "Pipeline Safety Improvement Act of 2002" on December 17, 2002. Upon becoming a law, it became Public Law 107-355 which can be found at <https://www.gpo.gov/>. The Pipeline Safety Improvement Act of 2002 introduces several new requirements for Pipeline Operators including those specifically addressing Pipeline Integrity Management. Section 14 of the Act titled "Risk Analysis and Integrity Management Programs for Gas Pipelines" mandates several new pipeline integrity related requirements.
- **Baseline assessment plan** – A schedule for performing pipe integrity assessments over the 10-year baseline period is developed. Risk assessment results are used to prioritize the projects. The highest risk 50 percent was required to be assessed by December 17, 2007 and the other 50 percent by December 17, 2012. The method of integrity assessment is also selected for each segment and becomes part of the plan along with the schedule. More than one method may be required depending on the threats identified.
- **Integrity assessment** – The pipe segments are assessed according to the schedule and methods identified in the Baseline Assessment Plan. There are three primary assessment methods:
  - 1) Inline inspection – an inspection tool, often called a "smart pig," is run through the pipeline to evaluate the pipe's condition.
  - 2) Pressure test – the pipe is pressured to at least one and one-half its normal operating limit to test the strength of the pipe. Water is usually used to pressure the pipe during the test.
  - 3) Direct Assessment – a structured, multistep evaluation is conducted to identify potential problem areas.