

City of Lumpkin
P.O. Box 278
Lumpkin, Georgia 31815

James P. Babb
Mayor

Barbara Cullefer
Mayor Pro tem

September 22, 2017

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street
Atlanta, GA 30334

RE: Docket No. 37066
Inspection No. CS17-015

Dear Mr. McAlister:

The City of Lumpkin (“Lumpkin”) respectfully files this response to the Report on Inspection No. CS17-015 that was filed on August 10, 2017, in Docket No. 37066, in accordance with the *Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC’s Pipeline Safety Director* that was attached to the Report.

Enclosed herewith are five (5) copies of this response, as well as a CD containing an electronic version of the response.

LETTER OF CONCERN

“As a result of this inspection, Staff identified an item of concern regarding the City of Lumpkin’s Operator Qualification program; specifically:

CODE REQUIREMENT: 49CFR §192.805(g)...

CONCERN: Staff is concerned that if the Operator does not actively monitor its personnel’s qualifications and ensure that they are current, covered tasks could be performed for which their personnel are not qualified.”

RESPONSE

In accordance with section IB of the *Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC’s*

Pipeline Safety Director, Lumpkin acknowledges receipt of this Letter of Concern and provides notice that the following actions have been taken:

Lumpkin allowed Tasks 0321 and 0341 for its personnel to expire because these Tasks are being performed by a contractor. Tasks 0681 and 0711 had expired and had been re-evaluated prior to this Inspection. Lumpkin has taken steps to prevent future lapses in necessary Qualifications by contracting with a third-party Operator Qualification training and evaluating service.

CONTINUING PROBABLE VIOLATION

In accordance with section IID of the *Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC's Pipeline Safety Director* that was included with this Report, Lumpkin provides the current status, updates, expected completion dates, and proposed modifications, if any, of the Continuing and/or existing Violations that were not cleared as a result of the current Inspection.

1. "In regard to the probable violation of 49CFR §199.101, which was cited in Inspection Number LB16-003..."

STATUS

As stated in the Report, Lumpkin has taken action to address this Probable Violation and the Staff is holding the violation open until a Consent Agreement has been completed. Lumpkin has proposed mitigation measures and is awaiting a response.

2. "In regard to the probable violation of 49CFR §199.105(d), which was cited in Inspection Number LB16-003..."

STATUS

As stated in the Report, Lumpkin has taken action to address this Probable Violation and the Staff is holding the violation open until a Consent Agreement has been completed. Lumpkin has proposed mitigation measures and is awaiting a response.

3. "In regard to the probable violation of 49CFR §40.73(c), which was cited in Inspection Number LB16-003..."

STATUS

As stated in the Report, Lumpkin has taken action to address this Probable Violation and the Staff is holding the violation open until a Consent Agreement has been completed. Lumpkin has proposed mitigation measures and is awaiting a response.

4. "In regard to the probable violation of 49CFR §40.67(d)(2), which was cited in Inspection Number LB16-003..."

STATUS

As stated in the Report, Lumpkin has taken action to address this Probable Violation and the Staff is holding the violation open until a Consent Agreement has been completed. Lumpkin has proposed mitigation measures and is awaiting a response.

5. "In regard to the probable violation of 49CFR §40.67(g), which was cited in Inspection Number LB16-003..."

STATUS

As stated in the Report, Lumpkin has taken action to address this Probable Violation and the Staff is holding the violation open until a Consent Agreement has been completed. Lumpkin has proposed mitigation measures and is awaiting a response.

6. "In regard to the probable violation of 49CFR §192.455, which was cited in Inspection Number LB10-047..."

During this inspection, Staff determined that the Operator has taken action to address the probable violation; however, Staff also found that the Operator has not completed actions to clear this probable violation. Staff determined that this violation cannot be cleared at this time."

STATUS

Lumpkin's City Manager will prepare a plan for addressing the remaining bare steel services and will seek City Council approval of the plan at its October meeting. The response to this Continuing Violation will be updated within 30 days following the City Council meeting.

Please let us know if you have any questions or need additional information.

Sincerely,
CITY OF LUMPKIN



Shirley Walker
City Manager

cc: Michelle Thebert, GPSC
Chris Swann, GPSC
Chris Welborn, SRCS

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P.O. Box 278
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Executive Secretary
Georgia Public Service Commission
244 Washington Street
Atlanta, GA 30334

RE: Docket No. 37066
Inspection No. CS17-014

Dear Mr. McAlister:

The City of Lumpkin (“Lumpkin”) respectfully files this response to the Report on Inspection No. CS17-014 that was filed on August 10, 2017, in Docket No. 37066, in accordance with the *Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC’s Pipeline Safety Director* that was attached to the Report.

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PROBABLE VIOLATION CONTINUING

In accordance with section IID of the *Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC’s Pipeline Safety Director* that was included with this Report, Lumpkin provides the current status, updates, expected completion dates, and proposed modifications, if any, of the Continuing and/or existing Violations that were not cleared as a result of the current Inspection.

1. “In regard to the probable violation of 49CFR §199.101, which was cited in Inspection Number LB16-003...”

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As stated in the Report, Lumpkin has taken action to address this Probable Violation and the Staff is holding the violation open until a Consent Agreement has been completed. Lumpkin has proposed mitigation measures and is awaiting a response.

5. "In regard to the probable violation of 49CFR §40.67(g), which was cited in Inspection Number LB16-003..."

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As stated in the Report, Lumpkin has taken action to address this Probable Violation and the Staff is holding the violation open until a Consent Agreement has been completed. Lumpkin has proposed mitigation measures and is awaiting a response.

6. "In regard to the probable violation of 49CFR §192.455, which was cited in Inspection Number LB10-047..."

During this inspection, Staff determined that the Operator has taken action to address the probable violation; however, Staff also found that the Operator has not completed actions to clear this probable violation. Staff determined that this violation cannot be cleared at this time."

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Please let us know if you have any questions or need additional information.

Sincerely,
CITY OF LUMPKIN

A handwritten signature in cursive script that reads "Shirley Walker".

Shirley Walker
City Manager

cc: Michelle Thebert, GPSC
Chris Swann, GPSC
Chris Welborn, SRCS