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FACILITIES PROTECTION UNIT DIRECTOR

Georgia Public Service Commission

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

244 Washington Street, SW
Atlanta, GA 30334-5701

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

Docket No. 37066

DOCKET# 37066
DOCUMENT# 182582

City of Lumpkin Gas Department
P. O. Box 278
Lumpkin, GA 31815

Certified Mail

Regular Mail

Attention: Mr. David Davis

On June 10, 2020, a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an inspection of your gas system. The enclosed inspection report numbered JS20-029 is provided for your information and file.

In conjunction with this inspection report, Staff has recommended the following enforcement(s):

Enforcement Action:

- Notice of Probable Violation
- Notice of Probable Violation with Proposed Civil Penalty
- Notice of Amendment

Enforcement Letter:

- Warning Letter
- Letter of Concern

Enforcement Notification:

- Observed Issue
- No Violation

Please review and respond to this report in accordance with the attached Instructions for Responding to Enforcement Actions, Enforcement Letters, and Notifications Issued by the Georgia Public Service Commission. Please refer to Docket No. 37066 in your response.

Please let me know if there are any questions concerning this report at (404) 463-6526 or michellet@psc.state.ga.us. Thank you for your continuing contribution toward increased pipeline safety.

Sincerely,

Michelle L. Thebert
Director, Office of Pipeline Safety/Facilities Protection

COMMISSIONERS

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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: JS20-029

OPERATOR: City of Lumpkin Gas Department

INVESTIGATOR: Jason Smith

INSPECTION DATE: June 10, 2020

REPORT MAILED DATE: September 23, 2020

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

1. PURPOSE OF INSPECTION

To conduct an inspection of the Operator's anti-drug and alcohol programs as required by 49CFR Part(s) 40 and 199.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.455	External corrosion control: Buried or submerged pipelines installed after July 31	LB10-047	5/4/2010
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	JS18-001	1/23/2018

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
199.101	Anti-Drug Plan	JS20-029	6/10/2020
199.117	Recordkeeping	JS20-029	6/10/2020
199.105(c)(6)	The operator shall randomly select a sufficient number of covered employees for testing during...	JS20-029	6/10/2020
40.15(b)	As an employer, you are responsible for ensuring that the service agents you use meet the...	JS20-029	6/10/2020

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

CITY OF LUMPKIN GAS DEPARTMENT / DRUG & ALCOHOL INSPECTION
INSPECTION NUMBER JS20-029 /DOCKET NUMBER 37066

On June 10, 2020 Pipeline Safety Staff began performing an inspection of the City of Lumpkin Gas Department's anti-Drug & Alcohol program. On August 31, 2020 Pipeline Safety Staff reported to the city of Lumpkin to complete the inspection.

During this inspection, the Operator was represented by:

Anne Holloway - Lumpkin City Clerk

David Davis - Lumpkin City Manager

Chris Welborn - MGAG/SRCS (consultant)

Commission Staff was represented by:

Jason Smith - Lead Inspector

Kenny Rowe - Pipeline Safety Inspector

At the time of this inspection the City of Lumpkin Gas Department was under one (1) previously existing probable violation (from #LB10-047) and negotiating a Consent Agreement with the Facilities Protection/Pipeline Safety Director (under #JS18-001). This probable violation is addressed under Follow-Up Inspection #JS20-028.

NOTICE OF PROBABLE VIOLATION

As a result of this inspection Staff found that the City of Lumpkin Gas Department was in violation of the minimum federal safety standards; specifically:

1. §40.15 May an employer use a service agent to meet DOT drug and alcohol testing requirements?
 - (b) As an employer, you are responsible for ensuring that the service agents you use meet the qualifications set forth in this part (e.g., §40.121 for MROs). You may require service agents to show you documentation that they meet the requirements of this part (e.g., documentation of MRO qualifications required by §40.121(e)).

PHMSA Inspection Protocol Question A-3: Qualification Requirements states: "Verify the operator's D&A program positions and/or service agents meet the applicable qualification requirements of Part 40 and Part 199."

COMMENTS: The Operator was not able to provide documentation to show that the service agent acting as their Substance Abuse Professional (SAP) met all the necessary qualifications of §40.281. In addition, they were not able to provide valid documentation to show their Medical Review Officer (MRO) meets the necessary qualifications of §40.121 & §199.109(b).

PROBABLE VIOLATION: The City of Lumpkin failed to ensure their service agents meet with the qualifications and requirements set forth under 49CFR, Parts 40 and 199.

2. §199.101 Anti-drug plan.
 - (a) Each operator shall maintain and follow a written anti-drug plan that conforms to the requirements of this part and the DOT Procedures. The plan must contain -

CITY OF LUMPKIN GAS DEPARTMENT / DRUG & ALCOHOL INSPECTION
INSPECTION NUMBER JS20-029 /DOCKET NUMBER 37066

PHMSA Inspection Protocol Question B-1: Written Anti-Drug Plan states: “Does the operator maintain and follow a written Anti-Drug Plan that conforms to the requirements of Part 199 and Part 40? [§199.101(a)]”

OBSERVED DEFICIENCY #1: Section 7.1 ‘Contractor Employees’ of the Operator’s Anti-Drug & Alcohol plan notes the contractor compliance verification process is included in Appendix EE of the plan. This appendix contains the procedures Lumpkin should use to determine compliance of contractors’ drug & alcohol program. A ‘Contractor Verification of Compliant Drug and Alcohol Plan’ form/checklist is present in order for the Operator to document their review of contractors’ program. The Operator did not record their review of the contractors’ drug & alcohol program on this form/checklist.

OBSERVED DEFICIENCY #2: Section 4.1 ‘Random Testing’ of the Operator’s anti-Drug & Alcohol plan, states ‘Random drug tests will be performed at least Quarterly.’ The City of Lumpkin Gas Department’s MIS data collection forms for 2017 and 2018 list three (3) were random drug test each year. If the City of Lumpkin covered employees were subject to quarterly random testing a total of 4 random test should have been performed in each year mentioned above.

Staff notes that the City of Lumpkin was previously found to be in violation of, and received a civil penalty for failing to follow the procedures in their Anti-drug plan. (Ref. Inspection Number LB16-003)

PROBABLE VIOLATION: The City of Lumpkin failed to follow the procedures required by their written Anti-Drug & Alcohol plan for verifying contractor drug plans and conducting random testing quarterly.

3. §199.105 Drug tests required.

(c) Random Testing.

- (6) The operator shall randomly select a sufficient number of covered employees for testing during each calendar year to equal an annual rate not less than the minimum annual percentage rate for random drug testing determined by the Administrator.

PHMSA Inspection Protocol Question B-3c: Random Drug Testing states: “Does the operator have a process to ensure it selects a sufficient number of covered employees for random drug testing during each calendar year to equal an annual rate not less than the required minimum annual percentage rate? [§199.105(c)(6)].”

COMMENTS: In 2018 the minimum drug testing rate increased from 25 percent to 50 percent for all applicable employees. The Operator’s MIS data form for calendar year 2018 list seven (7) covered employees and three (3) random test pulls that year. With the testing rate set at 50% the Operator would be required to randomly test at least 3.5 employees to comply with the minimum annual percentage rate for random drug testing. The Operator should have made certain one more random test was done in 2018.

PROBABLE VIOLATION: The City of Lumpkin failed to conduct a sufficient amount of random drug testing as required by the drug testing regulations and their Anti-Drug & Alcohol plan procedures.

CITY OF LUMPKIN GAS DEPARTMENT / DRUG & ALCOHOL INSPECTION
INSPECTION NUMBER JS20-029 /DOCKET NUMBER 37066

4. §199.117 Recordkeeping

(a) Each operator shall keep the following records for the periods specified and permit access to the records as provided by paragraph (b) of this section:

(1) Records that demonstrate the collection process conforms to this part must be kept for at least 3 years.

PHMSA Inspection Protocol Question E-2: Required Drug Test Records states: Retention period - Three years - Records that demonstrate the collection process conforms to Part 199

COMMENTS: Under 49CFR, 40.73(a)(9), collectors are required to send Copy 2 of the CCF to the MRO and Copy 4 to the DER. They must fax or otherwise transmit these copies to the MRO and DER within 24 hours or during the next business day. They must keep Copy 3 for at least 30 days, unless otherwise specified by applicable DOT agency regulations.

Staff found that the City of Lumpkin's DER is not in possession of Copy #4 of the CCF's for the drug test which they have conducted; they have another form which documents that a random drug test took place.

Staff notes that the City of Lumpkin previously received a Warning Letter for failing to maintain records demonstrating compliance with the requirements of 49CFR, §199.117(a). (Ref. Inspection Number LB16-003)

PROBABLE VIOLATION: The City of Lumpkin failed to maintain records that demonstrate the collection process conforms to this part must for at least 3 years as required by Part 199.

PROPOSED CIVIL PENALTY

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

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

Staff has reviewed the probable violations cited in this report and has recommended the following civil penalties. Please note that this recommended amount is less than the amount authorized by Georgia law.

NOPV#	Code Sec	Reference	Proposed Penalty
2	§199.101(a)	Anti-drug plan / following procedures	\$5,000.00
3	§199.105(c)(6)	Random Testing	\$2,500.00
4	§199.117(a)(1)	Recordkeeping	\$2,500.00

CITY OF LUMPKIN GAS DEPARTMENT / DRUG & ALCOHOL INSPECTION
INSPECTION NUMBER JS20-029 /DOCKET NUMBER 37066

TOTAL PROPOSED CIVIL PENALTY

\$10,000.00

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.

Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC's Pipeline Safety Director

Commission Rules 515-9-3-.09 and .10 provide the options available to respond when an Enforcement Letter is issued by the Facilities Protection Unit Director/Pipeline Safety Director (Director) of the Georgia Public Service Commission ("Commission"). The following information provides natural gas operators with general information, the process for responding to said Enforcement Letters, and procedures for requesting a hearing.

For all written responses or any other official correspondence, the Operator shall file the response at the following address:

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

The Operator must file **five (5)** copies of any response and/or official correspondence, as well as a CD with an electronic version of the response in Microsoft Word and/or a PDF, if applicable.

I. General Information Regarding Enforcement Actions, Enforcement Letters, and Notifications Issued by the Commission

A. Enforcement Actions:

1. Notice of Probable Violation (NOPV)-The purpose of this enforcement action is to document and to provide notice concerning any probable violations of a rule or regulation. A NOPV may or may not contain a proposed civil penalty.
2. Notice of Amendment (NOA)-The purpose of this enforcement action is to document and to provide notice concerning a required plan amendment for an Operator.

Enforcement Actions require a written response from the Operator detailing how the issue will be addressed or corrected, and the proposed timeframe(s) for said corrections. See *Process for Responding to Enforcement Actions* below for additional details.

B. Enforcement Letters:

1. Warning Letter-The purpose of this letter is to document and to provide notice concerning any probable violations of a rule or regulation.
2. Letter of Concern- The purpose of this letter is to document concerns with an Operator's plans, programs, or facilities, which could result in a probable violation unless action is taken to address the issue.

Enforcement Letters require a written response within thirty (30) days acknowledging receipt of the letter(s). Enforcement Letters serve as notice to the Operator that if appropriate action is not taken to correct the probable violation(s), enforcement actions may be taken if a subsequent inspection reveals continuing or new violation(s). The Operator is not required to provide corrective action or file a written plan of action; however, it is in the best interest of the Operator to provide notice as to whether any corrective action will be taken. Failure to provide this information may result in formal interrogatories from the Director through data requests.

C. Notifications:

1. Observed Issue: The purpose of this notification is to inform the Operator of identified or observed conditions or operating practices that may or may not be in violation at the time. However, if the issue is not corrected, it may result in a future violation or an unsafe situation.

Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC's Pipeline Safety Director

2. **No Violation:** The purpose of this notification is to inform the Operator that no violations were noted during the inspection. This notification will be sent to the Operator by electronic mail. Please note that it is the Operator's responsibility to ensure that the GPSC has the correct e-mail address for the required recipient of Commission correspondence.

Notifications require an electronic response to the Director @ michellet@psc.state.ga.us within five (5) days acknowledging receipt of the notification.

II. Process for Responding to Enforcement Actions

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

A. Notice of Probable Violation (NOPV)

The Operator may request an informal conference with the Director and/or her Staff to discuss the NOPV. The violation may be resolved at this stage; however, if agreement cannot be reached, enforcement procedures shall continue. If you chose not to seek an informal conference, the following due process options are available:

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

If the corrective measures that the Operator presents or proposes are acceptable to the Director, the violation may be cleared at this point. Such acceptance shall be verified by written statement issued by the Director following a re-inspection of the operator's facilities.

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

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

B. Notice of Probable Violation with a Proposed Civil Penalty

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

1. If you are not contesting the violation alleged or the proposed civil penalty, submit a written response notifying the Director of your desire to settle this matter by paying the recommended proposed civil penalty. Upon such notification, you will be provided with a Consent Agreement that shall be fully executed by the Operator, and submitted along with a

Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC's Pipeline Safety Director

certified check for the full amount of the recommended civil penalty and made payable to the Georgia Public Service Commission. You must ensure that the Operator's name and the applicable Docket No. and Inspection Report No. are included in the "memo" line of the certified check. The certified check shall be mailed to:

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

2. If you are not contesting the violation alleged, but are contesting the proposed civil penalty, and wish to submit written explanations, information, or other materials you believe warrant mitigation of the civil penalty, you may submit such materials. The Director will review the materials and provide the operator with a draft Consent Agreement that will represent the Staff's initial settlement offer. You must either sign the draft Consent Agreement or submit a counter-offer back to the Staff within thirty (30) days. Please refer to Commission Rule 515-9-3-.011, for the factors that the Commission considers regarding the assessment of civil penalties.

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

1. The Commission may seek an injunction or mandamus in superior court in cases where immediate action is necessary; or
 2. The Commission may issue a show cause order and/or schedule a hearing requiring the operator to demonstrate why the operator should not be subject to the penalties set forth by O.C.G.A. §46-2-91.
3. If you are contesting both the alleged violation and the proposed civil penalty, you may request a hearing before the Commission. Please see *Procedures for Requesting a Hearing* below.

C. Notice of Amendment (NOA)

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

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

Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC's Pipeline Safety Director

statement issued by the Director. If the information provided is not acceptable to the Director, then the Operator will be given the option of an Informal Conference with the Director or the case will be referred to the Commission for a formal resolution on the contested issue.

D. Continuing and/or Existing Violations

Continuing and/or existing violations that were not cleared as a result of the current inspection must be addressed in the response letter. The Operator shall provide the current status, updates, expected completion dates, proposed modifications, etc., of the continuing and/or existing violations in each response letter, even if this information was provided in a previously filed response letter. Failure to provide this information may result in formal interrogatories from the Director through data requests. **Please Note:** Referencing a previously filed response letter does not meet the intent of this provision.

III. Procedures for Requesting a Hearing

The Operator has the right to request a hearing to contest the alleged probable violations, recommended civil penalties, and all other proposed actions of enforcement. A request for a hearing must be submitted in writing and in accordance with Commission Rule 515-2-1-.04. The Operator must include a statement of the issues that you intend to raise at the hearing. The issues may relate to the allegations, new information, proposed compliance order, proposed civil penalty, or any other recommendation for enforcement action. Please refer to Commission Rule 515-9-3-.11 and O.C.G.A. § 46-2-91 for assessment considerations upon which civil penalties are based. An operator's failure to specify an issue may result in a waiver of the right to raise that issue at hearing. Your request must also indicate whether or not you will be represented by counsel at the hearing.

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

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

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

IN THE MATTER OF:

Probable Violation with Proposed Civil)
Penalty City of Lumpkin Gas Department) DOCKET NO. 37066
Inspection JS20-029 on June 10, 2020)
)

CERTIFICATE OF SERVICE

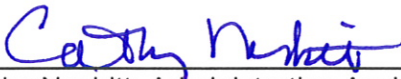
I, the undersigned, do hereby certify that I have caused to be served a copy of the foregoing, and a copy of same was served upon all parties and persons listed below via electronic mail as indicated by an asterisk I further certify that the *City of Lumpkin Gas Department* was served a hard copy of the above-stated document by U.S. Mail, certified/return receipt requested.

*Reece McAlister, Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334

*David Davis, City Manager
City of Lumpkin Gas Department
P.O. Box 278
Lumpkin, GA 31815
ddavis@cityoflumpkin.org

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

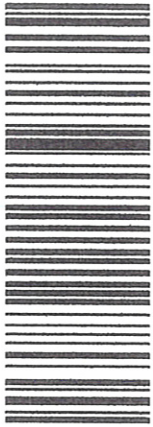
Respectfully Submitted this 24th day of September 2020:



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

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.

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Total Paid	David Davis, City Manager	
Sent To	City of Lumpkin Gas Department	
Street, Ap or PO Box	P.O. Box 278	
City, State	Lumpkin, GA 31815	
	DN37066-JS20-029	

PS Form 3800, August 2000

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

David Davis, City Manager
City of Lumpkin Gas Department
P.O. Box 278
Lumpkin, GA 31815
DN37066-JS20-029

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
X Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number (Transfer from service label) 7011 3500 0001 0594 3906

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540