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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
psc.ga.gov

DOCKET# 37055
DOCUMENT# 191814

Docket No. 37055

City of Grantville Gas System
123 LaGrange Street P. O. Box 160
Grantville, GA 30220

REF: Methane Emission Plan Inspection # JB22-018

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Al Grieshaber

On August 4, 2022, a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an inspection of your gas system. The enclosed inspection report numbered JB22-018 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. 37055 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 Thebert

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

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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: JB22-018

OPERATOR: City of Grantville Gas System

INVESTIGATOR: Jeff Baggett

INSPECTION DATE: August 4, 2022 REPORT MAILED DATE: October 13, 2022

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

1. PURPOSE OF INSPECTION

To perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	JL18-002	1/30/2018
192.617	Investigation of failures.	AT22-006	2/3/2022
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	AT22-006	2/3/2022
192.615(b)(3)	Review employee activities to determine whether the procedures were effectively followed in each...	AT22-006	2/3/2022
192.605(b)(3)	Maintenance and normal operations. The manual required by paragraph (a) of this section must...	AT22-006	2/3/2022
192.615(a)(6)	Emergency shutdown and pressure reduction in any section of the operator's pipeline system neces...	AT22-006	2/3/2022
192.615(a)(4)	The availability of personnel, equipment, tools, and materials, as needed at the scene of an...	AT22-006	2/3/2022
192.807(b)	Records supporting an individual's current qualification shall be maintained while the individual...	AT22-006	2/3/2022

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

On August 4, 2022, Staff reported to the City of Grantville Gas Department to perform an inspection of the Operator's methane emission reduction plan for their distribution facilities for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020.

During this inspection, the Operator was represented by:
Joan Henry – Public Works & Utilities Coordinator
Gene Taylor – MGAG/SRCS (Consultant)

Commission Staff was represented in person by Jeff Baggett, Supervisor, FPU / Lead Inspector.

At the time of this inspection the City of Grantville had seven previously existing probable violations. Staff did not review these items during this inspection.

NO VIOLATIONS FOUND

The Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020 was signed on December 27, 2020. This statute contains a self-executing mandate requiring operators to update their inspection and maintenance plans to address eliminating hazardous leaks and minimizing releases of natural gas (including intentional venting during normal operations) from their pipeline facilities. Operators must also revise their plans to address the replacement or remediation of pipeline facilities that are known to leak based on their material, design, or past operating and maintenance history.

Section 114 of the Protecting our Infrastructure of Pipelines and Enhancing Safety Act of 2020, Public Law No. 116-260 (Act) requires operators, by December 27, 2021, to update the inspection and maintenance plan required under section 60108(a) to address the elements described in the amendments to that section outlined below:

- Section 60108(a)(2)(D) - the extent to which the plan will contribute to — (i) public safety; (ii) eliminating hazardous leaks and minimizing releases of natural gas from pipeline facilities; and (iii) the protection of the environment; and

- Section 60108(a)(2)(E) - the extent to which the plan addresses the replacement or remediation of pipelines that are known to leak based on the material (including cast iron, unprotected steel, wrought iron, and historic plastics with known issues), design, or past operating and maintenance history of the pipeline.

As a result of this inspection Staff noted no probable violations of the minimum federal safety standards.

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:	)	
	)	
No Violation Report	)	**DOCKET NO. 37055**
City of Grantville Gas System	)	
Inspection JB22-018 on August 4, 2022	)	
	)	

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 Grantville Gas System* was served a hard copy of the above-stated document by U.S. Mail, certified/return receipt requested.

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

*Al Grieshaber, City Manager
City of Grantville Gas System
123 LaGrange Street
P.O. Box 160
Grantville, GA 30220
agrieshaber@grantvillega.org

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

Respectfully Submitted this 17th day of October 2022:

Cathy Nesbitt

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