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Georgia Public Service Commission

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Docket No. 40051

DOCKET# 40051
DOCUMENT# 192700

Reinhardt University
ATTN: Director of Facilities
7300 Reinhardt Circle
Waleska, GA 30183-2981
DELIVERED VIA E-MAIL

RE: Inspection Report JS22-034

Dear Mr. Jeffery Dale -

Based on review of Reinhardt University's response, discussions with Pipeline Safety Staff and/or Operator, and/or any additional information provided for Inspection Report JS22-029, I have cleared the following Enforcement Actions:

Violation	Description	Inspection#
192.603(c)	General - The Associate Administrator or the State Agency that has submitted a current...	JS22-029

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

Please let me know if there are any questions or concerns regarding this correspondence at (404) 463-6526 or michellet@psc.state.ga.us. 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: JS22-034

OPERATOR: Reinhardt University

INVESTIGATOR: Jason Smith

INSPECTION DATE: December 6, 2022 REPORT MAILED DATE: January 10, 2023

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

1. PURPOSE OF INSPECTION

To review the Operator's submitted response for inspection #JS22-029.

2. CONTINUING VIOLATIONS

3. CLEARED VIOLATIONS

Cleared on 12/6/2022

Violation	Description	Inspection#	Date
192.603(c)	General - The Associate Administrator or the State Agency that has submitted a current...	JS22-029	8/3/2022

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

See written report

192.603(c) cleared

On November 15, 2022, Pipeline Safety began reviewing Reinhardt University's written response which was submitted for inspection #JS22-029.

This review was conducted by:
Jason Smith - Lead Pipeline Safety Inspector
Jeff Baggett - Pipeline Safety Supervisor

During this review, Staff determined the following:

PROBABLE VIOLATION CLEARED

In regard to the probable violation of 49CFR §192.603 which was cited under inspection #JS22-029; in that inspection Staff stated:

1. Inspection Question #7. Leaks & Releases - Investigation of Unanticipated Vented Releases
Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?

OBSERVED DEFICIENCY: Under 'Section 114 Action Items' of Reinhardt's methane emissions mitigation plan, it addresses unintentional releases of gas; but provides no procedures for the investigation of any unanticipated vented releases of natural gas.

Reinhardt University must amend their procedures to provide for investigation of any unanticipated vented releases of natural gas.

OPERATOR RESPONSE: In a response letter dated October 26, 2022 to the notice of probable violation cited under inspection #JS22-029; the Operator stated: Reinhardt University has made the following amendments to its procedures: O&M Manual Chapter 4 was amended to require investigation of all unanticipated vented releases of natural gas.

Their emissions plan Section 2 'Minimizing release of natural gas from pipeline facilities' now references a revision in their O&M chapter 4 that will require investigation of all unanticipated vented releases of natural gas.

O&M chapter IV 'Leak Detection/Investigation' states any unanticipated vented gas release or report of gas odor should be investigated immediately, Using procedures 1241 (Outside Gas Leak Investigation) or 1261 (Walking Gas Leakage Survey) in Appendix C.
Both of these procedures now include language stating a record of the task and any findings should include a year over year comparison and analysis of detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting.

REVIEW OF OPERATOR'S RESPONSE: Staff reviewed the response & documentation provided by Reinhardt University and found that it adequately addresses this deficiency.

Staff determined the deficiency has been cleared.

2. Inspection Question #8 & #18. Leaks & Releases - Leak Data Collection and Analysis
Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?

OBSERVED DEFICIENCY: The master meter operator, Reinhardt University does not file an annual (7100) report which identifies leaks by cause. Staff found no procedures or methodology to collect, retain and analyze detailed information from both reportable & non-reportable detected natural gas leaks (non-reportable being those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting).

Reinhardt University must amend their procedures to include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting.

OPERATOR RESPONSE: In a response letter dated October 26, 2022 to the notice of probable violation cited under inspection #JS22-029; the Operator stated: Reinhardt University has made the following amendments to its procedures: O&M Manual Chapter 4 was amended to require investigation of all unanticipated vented releases of natural gas to provide for review of Lost and Unaccounted for Gas (LAUF) and to specify actions to reduce the associated volume.
O&M Manual Chapter 4, Table 4c was amended to identify, classify, mitigate and repair non-hazardous leaks, Procedures 1241 and 1261 were amended to require reports to analyze information from detected leaks.

Their amended emissions plan Section 2 'Minimizing release of natural gas from pipeline facilities' references a revision in their O&M chapter 4 that will require investigation of all unanticipated vented releases of natural gas, and a revision to Table 4(c) to identify, classify, mitigate and repair non-hazardous leaks.

O&M chapter IV 'Leak Detection/Investigation' states any unanticipated vented gas release or report of gas odor should be investigated immediately, using procedures 1241 (Outside Gas Leak Investigation) or 1261 (Walking Gas Leakage Survey) found in Appendix C.
These procedures now include language stating a record of the task and any findings should include a year over year comparison and analysis of detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting.

Table 4c 'Leak Classification And Action Criteria – Grade 3' now states under 'Action Criteria' Underground non-hazardous leaks, non-hazardous leaking regulators and above ground non-hazardous leaks measuring over ½% gas in air should be repaired or replaced within one calendar year, but no later than 15 months from the date the leak was reported. All other non-hazardous leaks should be re-evaluated during the next scheduled survey, or within 15 months of the date reported, whichever occurs first, until the leak is re-graded or no longer results in a reading.

REVIEW OF OPERATOR'S RESPONSE: Staff reviewed the response & documentation provided by Reinhardt University and found that it adequately addresses this deficiency.

Staff determined the deficiency has been cleared.

3. Inspection Question #10. Leak Mitigation & Repair
Do procedures define a process to identify, classify, mitigate and repair leaks?

OBSERVED DEFICIENCY: The master meter operator, Reinhardt University identifies, classifies and repairs leaks by the Commission Rule 515-9-1-.05 'Leak Standards'. It goes on to state non-hazardous leaks that remain non-hazardous are not required to be eliminated. The Operator's plan does not address the analysis and repair of all gas leaks; including those considered non-hazardous.

Reinhardt University must amend their procedures to define a process to identify, classify, mitigate and repair all leaks, not just hazardous leaks.

OPERATOR RESPONSE: In a response letter dated October 26, 2022 to the notice of probable violation cited under inspection #JS22-029; the Operator stated: Reinhardt University has made the following amendments to its procedures: Reinhardt University has made the following amendments to its procedures: O&M Manual Chapter 4 was amended to require investigation of all unanticipated vented releases of natural gas to provide for review of Lost and Unaccounted for Gas (LAUF) and to specify actions to reduce the associated volume.
O&M Manual Chapter 4, Table 4c was amended to identify, classify, mitigate and repair non-hazardous leaks, Procedures 1241 and 1261 were amended to require reports to analyze information from detected leaks.

Their amended emissions plan Section 2 'Minimizing release of natural gas from pipeline facilities' references a revision in their O&M chapter 4 that will require investigation of all unanticipated vented releases of natural gas. It also mentions Table 4(c) was revised to show the identification, classification, mitigation and repair of non-hazardous leaks.

O&M chapter IV 'Leak Detection/Investigation' states any unanticipated vented gas release or report of gas odor should be investigated immediately, Using procedures 1241 (Outside Gas Leak Investigation) or 1261 (Walking Gas Leakage Survey) in Appendix C.
Both of these procedures now include language stating a record of the task and any findings should include a year over year comparison and analysis of detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting.

Table 4c 'Leak Classification And Action Criteria – Grade 3' now states under 'Action Criteria' Underground non-hazardous leaks, non-hazardous leaking regulators and above ground non-hazardous leaks measuring over ½% gas in air should be repaired or replaced within one calendar year, but no later than 15 months from the date the leak was reported. All other non-hazardous leaks should be re-evaluated during the next scheduled survey, or within 15 months of the date reported, whichever occurs first, until the leak is re-graded or no longer results in a reading.

REVIEW OF OPERATOR'S RESPONSE: Staff reviewed the response & documentation provided by Reinhardt University and found that it adequately addresses this deficiency.

Staff determined the deficiency has been cleared.

4. Inspection Question #11. Leak Mitigation & Repair - Lost & Unaccounted for Gas
Do procedures provide for review of Lost & Unaccounted for Gas (LAUF) and do procedures specify actions to reduce the associated volume?

OBSERVED DEFICIENCY: As a master meter operator, Reinhardt University does not submit an annual (7100) report, and they do not have a procedure for determining their lost and unaccounted for gas.

Reinhardt University must establish a process to monitor and review their lost and unaccounted for gas so they can identify measure to reduce the associated volume.

OPERATOR RESPONSE: In a response letter dated October 26, 2022 to the notice of probable violation cited under inspection #JS22-029; the Operator stated: Reinhardt University has made the following amendments to its procedures: O&M Manual Chapter 4 was amended to require investigation of all unanticipated vented releases of natural gas to provide for review of Lost and Unaccounted for Gas (LAUF) and to specify actions to reduce the associated volume.

Their amended emissions plan section 2 'Minimizing releases of natural gas from pipeline facilities' states Reinhardt University revised their O&M chapter 4 to provide for a review of Lost & Unaccounted for Gas (LAUF) and to specify actions to reduce the associated volume.

O&M chapter IV 'Leak Detection/Investigation' section #6 'Unaccounted for (UAF) Gas' states:
Reinhardt University, or their designated representative, shall investigate any unexpectedly high gas bill. A possible leak is indicated when an off-peak reading of a master meter with a known average seasonal utilization rate, shows unaccountably high usages rate. Periodic off-peak checks (preferably in the summer months from midnight to 3 or 4 a.m.) can be averaged to provide data for comparison in future checks. This method may indicate a leak on the system but will not provide a location for the leak. It is also most effective if consumption figures are known for a time period before the leak(s) occurred. A comparison of bills from the gas supplier showing gas consumption may also indicate leakage on the system. This procedure is also most effective when comparing consumption during summer months over a period of several years. If excess consumption is suspected, the system should be leak surveyed using gas detection equipment.

An unexpected increase in the amount of natural gas purchased from the supply company, Atlanta Gas Light Company, for a given month, as compared to past gas consumption for the same month, may indicate a leak in the system. The operator is cautioned that changes in load factors and weather must be considered when using this method. The operator should be sure to compare similar time periods, as a change in the meter reading cycle will affect this process. Dividing the gas purchased by the number of days in the billing cycle will give an average per day consumption, which would be more accurate to use in comparing bills. Low load periods such as the summer months would provide the best data.

REVIEW OF OPERATOR'S RESPONSE: Staff reviewed the response & documentation provided by Reinhardt University and found that it adequately addresses this deficiency.

Staff determined the deficiency has been cleared.
49CFR §192.603 could be cleared at this time.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

IN THE MATTER OF:	)	
	)	
Cleared Enforcement Letter	)	**DOCKET NO. 40051**
Reinhardt College	)	
Inspection JS22-034 on December 6, 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 *Reinhardt College* 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

*Jeffery Dale, Director of Facilites
Reinhardt College
7300 Reinhardt College Circle
Waleska, GA
jdale@reinhardt.edu

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

Respectfully Submitted this 18th day of January 2023:

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