COMMISSIONERS
TRICIA PRIDEMORE , Chairman
TIM G. ECHOLS , Vice-Chairman
FITZ JOHNSON
LAUREN "BUBBA" McDONALD
JASON SHAW

FILED
JAN 12 2023
EXECUTIVE SECRETARY
G.P.S.C.

REECE McALISTER
EXECUTIVE DIRECTOR

MICHELLE THEBERT
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# 37074
DOCUMENT# 192710

Docket No. 37074

City of Ocilla Gas Department
PO Box 626
113 North Erwin St
Ocilla, GA 31774

REF: Comprehensive Inspection # JJ22-016

☒ Certified Mail ☐ Regular Mail ☐ Email

Attention: Mr. Horace Hudgins

On March 15, 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 JJ22-016 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. 37074 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

COMMISSIONERS

TRICIA PRIDEMORE , Chairman
TIM G. ECHOLS , Vice-Chairman
FITZ JOHNSON
LAUREN "BUBBA" McDONALD
JASON SHAW

REECE McALISTER
EXECUTIVE DIRECTOR

MICHELLE THEBERT
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

REPORT OF NATURAL GAS SAFETY

INSPECTION NO: JJ22-016

OPERATOR: City of Ocilla Gas Department

INVESTIGATOR: Joe Jones

INSPECTION DATE: March 15, 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 conduct a comprehensive inspection of the Operators plans, programs, procedures, pipeline, and pipeline facilities for compliance with the minimum federal safety standards in 49CFR Parts 191 and 192.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.13(c)	Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and...	AT19-022	5/29/2019
199.241	Training for supervisors.	JS19-034	7/23/2019
199.117	Recordkeeping	JS19-034	7/23/2019
40.333	What records must employers keep?	JS19-034	7/23/2019
199.105(c)(6)	The operator shall randomly select a sufficient number of covered employees for testing during...	JS19-034	7/23/2019
199.115(a)	The operator remains responsible for ensuring that the requirements of this part are complied with	JS19-034	7/23/2019
199.113(c)	Supervisory Personnel Training (Drug)	JS19-034	7/23/2019
40.11	What are the general responsibilities of employers under this regulation?	JS19-034	7/23/2019
40.15(b)	As an employer, you are responsible for ensuring that the service agents you use meet the...	JS19-034	7/23/2019
515-9-3-.08	Written Formal Notice of Violation	JJ20-015	3/16/2020
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	JJ20-016	3/10/2020
192.603(c)	General - The Associate Administrator or the State Agency that has submitted a current...	JJ22-015	3/14/2022

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
192.613(a)	Continuing Surveillance - Each operator shall have a procedure for continuing surveillance of...	JJ22-016	3/15/2022
192.703(c)	Hazardous leaks must be repaired promptly.	JJ22-016	3/15/2022
192.199(h)	Except for a valve that will isolate the system under protection from its source of pressure...	JJ22-016	3/15/2022
192.481(c)	If atmospheric corrosion is found during an inspection, the operator must provide protection...	JJ22-016	3/15/2022
192.455 (e)	Aluminum may not be installed in a buried or submerged pipeline if that aluminum is exposed to an...	JJ22-016	3/15/2022
192.605(b)(2)	Controlling corrosion in accordance with the operations and maintenance requirements of Subpart...	JJ22-016	3/15/2022
192.723(b)	The type and scope of the leakage control program must be determined by the nature of the...	JJ22-016	3/15/2022
192.147(a)	Each flange or flange accessory (other than cast iron) must meet the minimum requirements of...	JJ22-016	3/15/2022

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATACHED NSPECTION REPORT

From April 15, thru May 5, 2022 Staff reported to the City of Ocilla Gas Department to perform a comprehensive inspection on the Operator's plans, procedures, programs, records and pipeline facilities for compliance with the minimum federal safety standards and conduct Protocol 9 OQ inspections for compliance with the minimum federal safety standards.

During this inspection the Operator was represented by:
Cornelius Hall – Gas Supervisor
Jeremy Drawdy – Gas Tech
Lucile Middlebrooks – City Clerk
Horace Hudgins – Mayor
Bobby Boyd – City Services Inc. (Consultant / Contractor)

Commission Staff was represented by:
Joseph Jones – Lead Inspector
Daphne Jones – Pipeline Safety Inspector
David Lewis – Pipeline Safety Inspector
Daniel Clemmons – Pipeline Safety Inspector

At the time of this inspection, the City of Ocilla was under eleven (11) previously existing probable violation. Operator is currently negotiating a Consent Agreement with the Facilities Protection Unit Director. These violations will be addressed under Follow-Up Inspection Number JJ22-017.

During this inspection Staff reviewed the City of Ocilla written operations and maintenance procedures, records, and gas facilities for compliance with 49 CFR Parts 191 and 192, and the GPSC rules for safe operation of a natural gas distribution system. Staff reviewed the City of Ocilla's Emergency Manual, the Operations and Maintenance Manual and the records for conducting regular operations on their gas system including the collection of field data required for the Operator's DIMP program. Staff also conducted field inspection of randomly selected pipeline field facilities located within the City of Ocilla and Irwin County including leak repairs, pressure stations and pressure recording devices, right of way conditions, atmospheric corrosion control, odorant testing, and accessibility of critical valves.

NOTICE OF PROBABLE VIOLATION

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

1. 49CFR §192.605 Procedural manual for operations, maintenance, and emergencies
   (b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.
      (2) Controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of this part.

   COMMENTS: Under §192.479 each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, and the coating material they use must be suitable for the prevention of atmospheric corrosion.

   On page 79 of the City of Ocilla operations and Maintenance manual it states:
   "Each above ground portion of the natural gas system that is exposed to the atmosphere must be cleaned and coated or jacketed with a material that is suitable for the prevention

of atmosphere corrosion. All new bare metallic installations will be coated or jacketed as soon as possible after installation for the prevention of atmospheric corrosion.

Application or repair of coating defects should follow the procedure for application and repair of brushed or rolled coatings and is B31Q task number 0991 with related procedures numbered 0141, 0171 and 0191.

The procedure followed for application and/or repair of wrapped external coating is B31Q task number 1011 with related procedure number 0151."

In the General section of the Operator OQ Procedure #1011 - External Coating Application & Repair – Wrapped, it states: "Apply the wrap using a slight tension in a spiral configuration with sufficient overlapping of the wrap to ensure proper coverage taking care to minimize wrinkling of the wrap."

During this inspection (#JJ22-016), Staff located at the LaSalle Detention Center a 4" pipe that feeds the meter set had been wrapped so that water could infiltrate the wraps and migrate under the wrap to the riser.

PROBABLE VIOLATION: The City of Ocilla failed to follow their procedures to properly apply protective wrap to exposed piping.

2. 49CFR §192.723 Distribution systems: Leakage surveys.
   (b) The type and scope of the leakage control program must be determined by the nature of the operations and the local conditions, but it must meet the following minimum requirements:
      (1) A leakage survey with leak detector equipment must be conducted in business districts, including tests of the atmosphere in gas, electric, telephone, sewer, and water system manholes, at cracks in pavement and sidewalks, and at other locations providing an opportunity for finding gas leaks, at intervals not exceeding 15 months, but at least once each calendar year.
      (2) A leakage survey with leak detector equipment must be conducted outside business districts as frequently as necessary, but at least once every 5 calendar years at intervals not exceeding 63 months. However, for cathodically unprotected distribution lines subject to § 192.465(e) on which electrical surveys for corrosion are impractical, a leakage survey must be conducted at least once every 3 calendar years at intervals not exceeding 39 months.

COMMENTS: In the City of Ocilla O&M Procedures Manual, on Page 115 it states:

"The Ocilla Gas Superintendent, or his designee, will perform all natural gas leakage surveys. Electronic leak detection equipment must be used to perform all natural gas leakage surveys, including tests of the atmosphere in gas, electric, telephone, sewer and water system manholes. Tests of the atmosphere in the business districts must be conducted at intervals not exceeding fifteen (15) months, but at least once each calendar year. All leak surveys will be the walking foot patrol type. All natural gas leakage surveys will be made by experienced personnel who have been specifically trained in the procedures to be employed during such operations.

Vegetation surveys are not acceptable. The procedure followed for a walking gas leak survey is B31Q task number 1261 with related procedures 1231 and 1241. Consideration must be given to increased frequency for leakage surveys based on the particular circumstances and conditions existing, but leakage surveys must be conducted outside

business districts at intervals not exceeding five (5) years. All leaks detected in the Ocilla natural gas system will be graded using the criteria in Appendix D."

During this inspection (#JJ22-016), Staff identified multiple locations inside business district that have not been surveyed within the one-year timeframes. For example, 1- Irwin Manufacturing (business district) – not surveyed November 2019, surveyed in October 2020 and not surveyed on the November 2021. Still not surveyed as of this inspection March 2022.

Staff also identified multiple locations outside business district that have not been surveyed within the five-year timeframes. Examples of locations: - 1007 N. Union St., 1003 N. Union St, and 700 Frank Rd. (non-business districts) were not surveyed 2017, 2018, 2019 2020, nor 2021 surveys. Still not surveyed as of this inspection March 2022.

PROBABLE VIOLATION: The City of Ocilla failed to conduct leakage surveys inside business districts, and outside business districts as required by 49CFR, §192.723(b) and their O&M Procedures.

3. 49CFR§192.613 Continuing surveillance.
(a) Each operator shall have a procedure for continuing surveillance of its facilities to determine and take appropriate action concerning changes in class location, failures, leakage history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions.

COMMENTS: In the City of Ocilla Operations & Maintenance Manual procedure for Continuing Surveillance, which starts on page 92, it states:

"As a means of maintaining the integrity of the gas system, continuing surveillance through the analysis of completed inspection and maintenance records, daily operating reports and other records shall be on going.

Continuing surveillance will be conducted so as to identify any system facilities experiencing abnormal or unusual operating and maintenance conditions. The Gas Superintendent or his designee will complete the "Continuing Surveillance Report Form" and keep this record for a minimum of five (5) years.

All segments of pipeline found to be in an unsatisfactory condition will be repaired or replaced as soon as practical. If the condition presents a hazard, the repair or replacement will be accomplished immediately. The Gas Superintendent will prepare plans and programs for upgrading and reconditioning and for phasing out facilities that cannot be reconditioned. If additional support is needed, the Gas Superintendent will contract with an experienced outside firm to make a study to determine what changes are required."

During this inspection (#JJ22-016), Staff identified an exposed pipe laying on the drive thru at the Ocilla Pharmacy parking lot. Staff identified this location because it was noted on the Operators leak survey report for this address in 2017. NOTE: Staff had the City of Ocilla remove this pipe from the main and the parking lot before we left.

PROBABLE VIOLATION: The City of Ocilla failed to ensure that all segments of pipeline found to be in an unsatisfactory condition were repaired or replaced as soon as practical, as required by their Operations and Maintenance Procedures.

4. 49CFR, §192.481 Atmospheric Corrosion Control: Monitoring.
(c) If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by §192.479.

COMMENTS: In the City of Ocilla Operations and Maintenance Procedures manual on page 80, it states:

> "All meter sets, regulator stations or exposed metallic portions of the Ocilla gas system must be cleaned and painted as required to prevent atmospheric corrosion [rust]. The procedure followed for application and/or repair of brushed or rolled coating is B31Q task number 0991 with related procedures numbered 0141, 0171 and 0191. The procedure followed for application and/or repair of wrapped external coating is B31Q task number 1011 with related procedure number 0151.
>
> The City must inspect and evaluate each pipeline or portion of the pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows: - Other than a Service Line: At least once every 3 calendar years, but with intervals not exceeding 39 months. If atmospheric corrosion is found on a service line during the most recent inspection, then the next inspection of that pipeline or portion of pipeline must be within 3 calendar years, but with intervals not exceeding 39 months."

During this inspection(#JJ22-016) Staff noted that the Operators documentation for their CY2018 leak survey indicated that there were multiple locations which had been identified as having moderate atmospheric corrosion; however, the Operator had no documentation which indicated that any of these deficiencies had been remediated as required by §192.481(c) and their O & M procedures.

Staff also observed, at the Highway 129 N. regulator station, numerous places on the pipe with possible pitting, and it appeared that the pipe had not been painted nor properly taken care of for a while. The inlet pipe wrapping was found approximately 2-inches below the ground line. Also, Staff found numerous locations throughout the system where meter sets are in need of maintenance, cleaning and painting.

Staff also observed that the City of Ocilla'a O&M Manual makes references to the City of Andersonville.

PROBABLE VIOLATION: The City of Ocilla failed to remediate atmospheric corrosion which was identified on their system as required by §192.481(c) and their Operations and Maintenance Procedures Manual.

5. 49CFR §192.147 - Flanges and flange accessories.
(a) - Each flange or flange accessory (other than cast iron) must meet the minimum requirements of ASME/ANSI B 16.5 and MSS SP-44 (incorporated by reference, *see* §192.7), or the equivalent.

COMMENTS: During this inspection (#JJ22-016) Staff identified, at the Highway 129 N. regulator station that several flange bolts were left with no threads extending through the nut.

PROBABLE VIOLATION: The City of Ocilla Natural Gas System failed to ensure that each of their flanges or flange accessories meet the minimum requirements of ASME/ANSI B 16.5 and MSS SP-44 as required by §192.147(a).

6. 49CFR, §192.703 – General
(c) Hazardous leaks must be repaired promptly

COMMENTS: On Page 114 of the City of Ocilla's Operations and Procedures Manual it states:
"The City will not operate any segment of its pipeline, unless it is maintained in accordance with this section. Any segment of pipeline that becomes unsafe must be replaced, repaired, or removed from service. The procedure followed by the Gas Superintendent, to measure and characterize mechanical damage to installed pipe and components is B31Q task number 0211 with related procedures 0151, 0201, 0601, 0611, 0621, 0631, 0801-0811 and 1071. Hazardous leaks must be repaired promptly according to their classification."

Appendix E of the Operator's O&M is the leak grading criteria. A Grade 1 leak is a "leak that represents an existing or probable hazard to persons or property and requires immediate repair or continuous action until the conditions are no longer hazardous.

During this inspection Staff examined the City of Ocilla Leak surveys and found that on November 16, 2019 the Operator found a Grade 1 leak at 813 East Tenth Street; however, this leak was not repaired until June 15, 2021.

Staff also found that the Operators documentation failed to properly identify the location of leaks that they failed to address prior to the next leak survey; for example:

- In August 2017- identified a class 3 leak at Cherry St. N –Old McDonalds Appliances aka Chicken delight-N. Irwin.
  - In August 2018, the leak survey identified a class 2 leak at Cherry St. N –Old McDonalds Appliances aka Chicken delight-N. Irwin and a class 2 leak at 3rd St East- Old Precision Homes.
  - In November 2019, the leak survey identified a class 2 leak at Cherry St. N –Old McDonalds Appliances aka Chicken delight-N. Irwin, a class 2 leak at 3rd St East- Old Precision Homes.
- In August 2017- identified a class 2 leak at Old pressure chart on LAX hwy.
  - In August 2021- identified a class 3 leak at Old pressure chart on LAX hwy.

At the time of this inspection (JJ22-016) March 2022- No remedial measures have been taken to correct these leaks.

PROBABLE VIOLATION: The City of Ocilla failed to ensure that a hazardous leak was repaired promptly as required by §192.703(c) and their O&M Procedures.

7. 49CFR §192.199 - Requirements for design of pressure relief and limiting devices.
(h) Except for a valve that will isolate the system under protection from its source of pressure, be designed to prevent unauthorized operation of any stop valve that will make the pressure relief valve or pressure limiting device inoperative.

COMMENTS: During this inspection Staff found the relief valve not locked at the regulator station located at Highway 129 North, Ocilla, Ga.

PROBABLE VIOLATION: The Operator failed to provide for the prevention of unauthorized operation of any stop valve that will make the pressure relief valve or pressure limiting device inoperative at its regulator and relief station.

NOTICE OF AMENDMENT

1) 49CFR, §192.455 External corrosion control: Buried or submerged pipelines installed after July 31, 1971.
   (e) Aluminum may not be installed in a buried or submerged pipeline if that aluminum is exposed to an environment with a natural pH in excess of 8, unless tests or experience indicate its suitability in the particular environment involved.

   STAFFS COMMENTS: The Operators O&M Procedures for buried or submerged pipelines installed after July 31, 1971 do not address the requirements of §192.455(e). Staff notes that Operators procedures indicates that they do not have buried or submerged amphoteric metal, however, Staff found no indication that the Operator prevents the installation of aluminum in their system.

   REQUIRED AMENDMENT: The City of Ocilla Natural Gas System must amend their procedures to address the requirements of §192.455(e).

ITEM OF CONCERN:

1. 49CFR, §192.747 Valve maintenance: Distribution systems.
   (b) Each operator must take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternative valve.

   STAFFS CONCERN: During this inspection Staff performed a field inspection of the Operators emergency valves. Staff noted that the valve boxes located at Maple and 3rd St. (Valve # 38) have shifted and the Operator could not get a wrench on the nut of any of the valves. The valve (four valves) at "Ally and 2nd St." between Irwin and Cherry (#23) had been covered with asphalt. These valves were last inspected on March 1, 2021 and the inspection report did not indicate any issues.

2. CODE REQUIREMENT: 49CFR §192.181 - Distribution line valves.
   (b) Each regulator station controlling the flow or pressure of gas in a distribution system must have a valve installed on the inlet piping at a distance from the regulator station sufficient to permit the operation of the valve during an emergency that might preclude access to the station.

   COMMENTS: The City of Ocilla only has one regulator station, which is their city gate station. Staff inspected this station, which is located at the Highway 129 N. and was unable to locate a valve installed on the inlet piping at a distance from the regulator station sufficient to permit the operation of the valve during an emergency.

   STAFFS CONCERN: The City of Ocilla does not have a valve on the inlet piping to the regulator station at Hwy 129 N located at a distance from the regulator station sufficient to permit the operation of the valve during an emergency that might preclude access to the station. Staff is concerned that during an emergency the City of Ocilla would not be able to shut down this station.

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 Ocilla is subject to civil penalties under O.C.G.A. § 46-2-91(b) which states that: Any operator which violates any rule or regulation of the commission prescribed pursuant to subsection (i) of Code Section 46-2-20, or which fails, neglects, or refuses to comply with any order after notice thereof, shall be liable to a penalty not to exceed the maximum penalties provided for in 49 C.F.R. Section 190.223.

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

Item #	Code / Rule	Description	Proposed Penalty
NOPV #2	§192.723(b)	Leak Survey	$2.500.00
NOPV #3	§192.613(b)	Continuing Surveillance	$2,500.00
NOPV #4	§192.481(c)	Atmospheric Corrosion	$2,500.00
NOPV #6	§192.703(c)	Hazardous Leaks	$2,500.00
NOPV #7	§192.199(h)	Relief Valves	$2,500.00
TOTAL PROPOSED PENALTY			$12,500.00

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.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.13(c)	Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and...	AT19-022	5/29/2019
199.241	Training for supervisors.	JS19-034	7/23/2019
199.117	Recordkeeping	JS19-034	7/23/2019
40.333	What records must employers keep?	JS19-034	7/23/2019
199.105(c)(6)	The operator shall randomly select a sufficient number of covered employees for testing during...	JS19-034	7/23/2019
199.115(a)	The operator remains responsible for ensuring that the requirements of this part are complied with	JS19-034	7/23/2019
199.113(c)	Supervisory Personnel Training (Drug)	JS19-034	7/23/2019
40.11	What are the general responsibilities of employers under this regulation?	JS19-034	7/23/2019
40.15(b)	As an employer, you are responsible for ensuring that the service agents you use meet the...	JS19-034	7/23/2019
515-9-3-.08	Written Formal Notice of Violation	JJ20-015	3/16/2020
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	JJ20-016	3/10/2020
192.603(c)	General - The Associate Administrator or the State Agency that has submitted a current...	JJ22-015	3/14/2022

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
192.613(a)	Continuing Surveillance - Each operator shall have a procedure for continuing surveillance of...	JJ22-016	3/15/2022
192.703(c)	Hazardous leaks must be repaired promptly.	JJ22-016	3/15/2022
192.199(h)	Except for a valve that will isolate the system under protection from its source of pressure...	JJ22-016	3/15/2022
192.481(c)	If atmospheric corrosion is found during an inspection, the operator must provide protection...	JJ22-016	3/15/2022
192.455 (e)	Aluminum may not be installed in a buried or submerged pipeline if that aluminum is exposed to an...	JJ22-016	3/15/2022
192.605(b)(2)	Controlling corrosion in accordance with the operations and maintenance requirements of Subpart...	JJ22-016	3/15/2022
192.723(b)	The type and scope of the leakage control program must be determined by the nature of the...	JJ22-016	3/15/2022
192.147(a)	Each flange or flange accessory (other than cast iron) must meet the minimum requirements of...	JJ22-016	3/15/2022

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATACHED NSPECTION REPORT

OPERATOR RESPONSE FORM

Operator Name: CITY OF OCILLA GAS DEPARTMENT

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37074

Responses required within **30 days of electronic mail.** Provide the following information for this report:

Response to Inspection Number:_____

Type of Enforcement Action(s) cited in report:			Informal Conference Requested	
☐ Notice of Probable Violation (NOPV)	☐ New	☐Continuing	☐ Yes	☐ No
☐ Notice of Amendment (NOA)	☐ New	☐Continuing	☐ Yes	☐ No
☐ Warning Letter	☐ New	☐Continuing	☐ Yes	☐ No
☐ Letter of Concern	☐ New	☐Continuing	☐ Yes	☐ No
☐ Observed Issue	☐ New	☐Continuing	☐ Yes	☐ No
☐ Proposed Civil Penalty	$ _____ PCP $ Amount (Total for report)			

Indicate below (A-E) based on the type of Enforcement Actions in this report: (Check all that apply)
Complete a separate copy of Page 2, Operator Response to Enforcement Action, for each cited item.

A. Response for **Notice of Probable Violation** (with and without proposed civil penalty):
   1. ☐ Written statement indicating that corrective measures have achieved Compliance or
   2. ☐ Written plan of action outlining the corrective measures that will be taken to achieve compliance and when compliance is anticipated.

B. Response for **NOA**:
   1. ☐ Contested: Attach written explanation, information, or other material in answer to the allegations in the Notice of Amendment stating your reasons for objecting to the NOA, in whole or in part; or
   2. ☐ Not Contested: Explanation, information, or other material believed to warrant modification of the NOA in whole or in part; or
   3. ☐ Written request for clarification. (Attached)

C. Response for **Continuing** and/or **Existing** violations:
   Current status, updates, expected completion dates, proposed modifications, etc., of the continuing and/or existing violations, even if this information was previously provided. Referencing a previously filed response letter, as status, updates, etc. alone is not sufficient for this response. Failure to provide this information may result in formal interrogatories from the Director through data requests.

D. Response for ☐ **Letter of Concern** / ☐ **Warning Letter**
   I acknowledge receipt of the Letter of Concern/Warning Letter:_____
   SIGNATURE / TITLE

   Additional Comments: (Optional)_____

E. Response for **Observed Issue** and **No Violation**: (Optional Response)
   Staff requests that the Operator acknowledge receipt of the Observed Issue/No Violation in writing, or by submitting an email to the FPU Director

Operator Response to Enforcement Action

Enforcement Action for:_____ ☐ New Violation ☐ Continuing Violation

Enter Code / Commission Rule (Complete a separate attachment for each enforcement action)

Enforcement Action(s) cited in report:	Conference Requested:	
☐ Notice of Probable Violation (NOPV)	☐ Yes ☐ No	$_____
☐ Notice of Amendment (NOA)	☐ Yes ☐ No	Proposed Penalty for this violation
☐ Warning Letter	☐ Yes ☐ No	
☐ Letter of Concern	☐ Yes ☐ No	
☐ Observed Issue	☐ Yes ☐ No	
☐ Proposed Civil Penalty	☐ Yes ☐ No	

OPERATORS RESPONSE: _____

_____

_____

_____

_____

_____

_____

_____

Response Provided by: _____ Date:_____

Name / Title

Internal use only:

Lead Inspector: _____ Date Response Reviewed:_____

Actions Acceptable: ☐ Yes ☐No Re-inspection Needed:☐ Yes ☐ No Clear Violation:☐ Yes ☐ No

_____

Supervisor Review by:_____ Date Reviewed:_____

Additional Enforcement Recommended: ☐ Yes ☐ No

_____

Director Review

Approved: ☐ Yes ☐No Schedule Special Follow-up Inspection: ☐ Yes ☐ No

Cleared Violation: ☐ Yes ☐ No

Comments:_____

_____

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

Ms. Sallie Tanner, 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.

Informal Conference:
Any Operator who chooses to request an informal conference shall request such a conference through emailing the Director (michellet@psc.state.ga.us), calling the Director (404-463-2765), or selecting the "Request Conference" choice.

Civil Penalty Payments:
Certified check for the full amount of the recommended civil penalty or consent agreement amount made payable to the Georgia Public Service Commission. The Operator's name, applicable Docket No., and Inspection Report No. must be included on the certified check. Mail payment to:

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

Hearing Requests:
The Operator has the right to request a hearing before the full Commission 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. The request must also indicate whether or not the Operator will be represented by counsel at the hearing.

Open Records and Trade Secret Filings:
The Operator is 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:	)	
	)	
Violation(s) Report with Civil Penalty;	)	**DOCKET NO. 37074**
Notice of Amendment; and	)	
Letter of Concern	)	
City of Ocilla Gas Department	)	
Inspection JJ22-016 on March 15, 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 Ocilla Gas Department* 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

*The Honorable Horace Hudgins, Mayor
City of Ocilla Gas Department
P.O. Box 626
113 North Erwin St
Ocilla, GA 31774
mayor@cityofocillaga.net

*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

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