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MICHELLE THEBERT
FACILITIES PROTECTION UNIT DIRECTOR

Georgia Public Service Commission

(404) 463-6526
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244 Washington Street, SW
Atlanta, GA 30334-5701

FAX: (404) 463-6532
psc.ga.gov

Docket No. 37024

DOCKET# 37024
DOCUMENT# 192870

AGL - Operations and Engineering
Ten Peachtree Place, NE Suite 1000
Location 1365
Atlanta, GA 30309

REF: Accident Inspection # DJ22-005

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Pedro Cherry

On January 20, 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 DJ22-005 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. 37024 in your response.

Please let me know if there are any questions concerning this report at (404) 985-4271 or mthebert@psc.ga.gov. 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: DJ22-005

OPERATOR: AGL - West GA

INVESTIGATOR: Daphne Jones

INSPECTION DATE: January 20, 2022 REPORT MAILED DATE: January 23, 2023

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 investigation of a reported NOI to the GPSC.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.614	Damage prevention program.	JL15-022	3/31/2015
515-9-1-.06	Incident Notification	JL15-022	3/31/2015
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	AT19-001	1/3/2019

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

AGL-WEST GA/ INCIDENT INVESTIGATION
INSPECTION NUMBER DJ22-005 / DOCKET NUMBER 37024

On January 19, 2022 at 1:22 pm, GPSC Staff received notice from Atlanta Gas Light Company (West GA) of an event that had occurred at 6500 Alexander Pkwy, Douglasville, Ga. Staff was informed that an excavator had cut into a 4-inch plastic gas service line with a track hoe at Alexander High School. The Operator did not notify the National Response Center.

On January 20, 2022, at 2:00 pm, GPSC Staff reported to Alexander High School at 6500 Alexander Pkwy, Douglasville, in Douglas County, Georgia to conduct an incident investigation of the excavating incident that occurred on January 19, 2022 at 6500 Alexander Pkwy, Douglasville, Ga.

During this investigation the Operator was represented by:
Wade Hildebrand – AGL Operations Foreman
Bobby Smith – AGL Quality Assurance Specialist
Todd Haynes – AGL Quality Assurance Engineer
Russell Brock – AGL Damage Prevention Specialist
Troy Bjork – Carroll Daniel Construction Superintendent (On-site)

Commission Staff was represented by:
Daphne Jones - Lead Inspector
Joseph Jones – Pipeline Safety Inspector

At the time of this investigation the AGL – West GA Service Center was under three (3) previously existing probable violations. Because this inspection was specifically to perform an incident investigation, these violations were not reviewed.

STAFFS INVESTIGATION

On January 19, 2022, Terra Solutions, a sub-contractor for F.M. Kitchens (Sub-Contractor for Carroll Daniel Construction) cut into a 4-inch plastic gas service line with a track hoe at Alexander High School. Approximately 2,000 students and faculty were evacuated as a precaution to the high schools football field stadium. According to AGLC gas was off and safe at 3:35 pm on Jan 19, 2022. Distribution made repairs. Evacuees were allowed back into the building. There was no media, no injuries, and no road closures.

The incident happened at Alexander High School at 6500 Alexander Pkwy in Douglas County. The Georgia Public Service Commission was notified at 5:07pm on January 19, 2022. The scene where the incident happen was squeezed off and repaired at 3:35 pm on January 19, 2022. The pipeline was installed by AGL June 12, 1986; this was the old orange pipe TR418. Staff reviewed locate tickets for this location and found that:

1. On October 27, 2021 the excavator (Terra Solutions) requested a locate for this address and was issued UPC Ticket Number 211027-002230. The marking instructions for this ticket were to "LOC WITHIN WHITE LINED AREA." The ticket also indicated that the work was being done for F.M. Kitchens Construction Services, LLC. This ticket expired on November 26, 2021.

2. F.M. Kitchens Construction requested locate tickets on November 15, 2021 (211115-002098); December 8, 2021 (211208-001617) and January 24, 2022 (220124-002764).

3. None of the locate tickets for Terra Solutions or F.M. Kitchens were valid at the time of this damage.

Staff also found that AGLC did not operate any valves to reduce the time to shut down this section of main

during the emergency. AGLC was questioned as to why the Operator choose to squeeze the gas off rather than use a valve and they replied; "According to AGL distribution crew they made their assessment on the valve locations and what would be the safest and quickest way to eliminate the flow of gas and make repairs on the pipeline. Due to fact this was already a construction site in an open area at a high school with all mechanical ignition sources being eliminated including static electricity with the use of anti-static spray prior to the pipeline being squeezed off. AGL crews made their decision to squeeze off the pipeline based on this particular situation because they felt it was the safest and most prudent."

According to AGL on the day of the incident after it was made safe, the costs associated with the incident was being tallied and AGL determined that the required milling and repairs to the affected 4 inch pipe, and the emergency response would not exceed the $122,000 threshold for reporting to the National Response Center (NRC). According to AGL the NRC was not contacted.

ITEMS OF CONCERN

Based on Staffs investigation they identified the following items of concern.

1. 49CFR, §192.615 Emergency plans.
   (6) Taking necessary actions, including but not limited to, emergency shutdown, valve shut-off, or pressure reduction, in any section of the operator's pipeline system, to minimize hazards of released gas to life, property, or the environment.
   (7) Making safe any actual or potential hazard to life or property.

   STAFFS CONCERN: This event involved the evacuation of approximately 2,000 people, primarily school children. AGLC was notified of the damage to their facility at 1:22PM, and their service personnel arrived at approximately 1:39PM. AGLC did not stop the flow of gas until 3:35PM.

   Staff found no evidence that AGLC ever considered or attempted to operate a valve to minimize the hazards related to the release of gas which occurred in close proximity (approximately 100 feet) to one of the school building. Staff is concerned that AGLC allowed this line to blow for more than two hours while approximately 2,000 people, primarily students, were left standing in a football field while they excavated the main to perform a squeeze off.

2. 49CFR, §191.5 Immediate notice of certain incidents.
   (a) At the earliest practicable moment following discovery, but no later than one hour after confirmed discovery, each operator must give notice in accordance with paragraph (b) of this section of each incident as defined in § 191.3.

   STAFFS CONCERN
   Under 49CFR, §191.3, Incident means any of the following events:
   (1) An event that involves a release of gas from a pipeline, gas from an underground natural gas storage facility (UNGSF), liquefied natural gas, liquefied petroleum gas, refrigerant gas, or gas from an LNG facility, and that results in one or more of the following consequences:
      (i) A death, or personal injury necessitating in-patient hospitalization;
      (ii) Estimated property damage of $129,300 or more, including loss to the operator and others, or both, but excluding the cost of gas lost. For adjustments for inflation observed in calendar year 2021 onwards, changes to the reporting threshold will be posted on PHMSA's website. These changes will be determined in accordance with the procedures in appendix A to part 191.
      (iii) Unintentional estimated gas loss of three million cubic feet or more.

(2) An event that results in an emergency shutdown of an LNG facility or a UNGSF. Activation of an emergency shutdown system for reasons other than an actual emergency within the facility does not constitute an incident.
(3) An event that is significant in the judgment of the operator, even though it did not meet the criteria of paragraph (1) or (2) of this definition.

This event involved the evacuation of approximately 2,000 people, primarily school children, who were left standing in a football field for more than two hours while gas blew from an excavation damage approximately 100 feet from a school building while the Operator had to perform an excavation to perform a squeeze off. Staff is concerned that AGLC does not consider this to be a significant event.

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:	)	
	)	
Letter of Concern	)	**DOCKET NO. 37024**
Atlanta Gas Light Company-West GA	)	
Inspection DJ22-005 on January 20, 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 *Atlanta Gas Light Company* 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

* Pedro Cherry, President and CEO
Southern Company Gas
Ten Peachtree Place, NE,
Atlanta, GA 30309
ppcherry@southernco.com

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

Respectfully Submitted this 26th day of January 2023:

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