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DOCKET# 37039
DOCUMENT# 192871

Docket No. 37039

City of Cordele Gas System
PO Box 569
501 N. Seventh Street
Cordele, GA 31010
DELIVERED VIA E-MAIL

RE: Inspection Report DJ22-054

Dear Ms. Angela Redding -

Based on review of City of Cordele Gas System's response, discussions with Pipeline Safety Staff and/or Operator, and/or any additional information provided for Inspection Report JS16-026, I have cleared the following Enforcement Actions:

Violation	Description	Inspection#
192.513(c)	The test pressure must be at least 150 percent of the maximum operating pressure or 50 p.s.i...	JS16-026

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

Please let me know if there are any questions or concerns regarding this correspondence at (404) 985-4271 or mthebert@psc.ga.gov. 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: DJ22-054

OPERATOR: City of Cordele Gas System

INVESTIGATOR: Daphne Jones

INSPECTION DATE: December 6, 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 conduct a review of the Operator's response of the Operators previously existing probable violations.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.619(a)	No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum...	JS16-026	7/25/2016

3. CLEARED VIOLATIONS

Cleared on 12/6/2022

Violation	Description	Inspection#	Date
192.513(c)	The test pressure must be at least 150 percent of the maximum operating pressure or 50 p.s.i...	JS16-026	7/25/2016

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

See written review of operator response

192.513(c) cleared
192.619(a) continuing

CITY OF CORDELE / REVIEW OF OPERATOR RESPONSE
INSPECTION NUMBER DJ22-054 / DOCKET NUMBER 37039

From December 6-7, 2022, Staff reviewed the City of Cordele's response letter which was submitted for Inspection Number JS16-026.

This review was conducted by:
Daphne Jones - Pipeline Safety Inspector – Lead.
Daniel Clemmons - Pipeline Safety Inspector

During this review, Staff determined the following:

PROBABLE VIOLATION CLEARED

1. In regard to the Probable Violation of 49CFR, §192.513(c) which was cited in Inspection Number JS16-026; in that inspection Staff stated, "The City of Cordele Gas System failed to properly pressure test their PE facilities."

   PROBABLE VIOLATION: The City of Cordele Gas System failed to properly pressure test their PE facilities."

   3rd FOLLOW-UP INSPECTION: On May 28, 2019, Staff conducted a Follow-Up Inspection of the Operators previously existing probable violations (Ref. Inspection Number JS19-022), In this inspection, Staff Stated that: "Staff found that the four plastic service lines (3213 Old Hatley Rd, 313 North 7th St, 1901 Quil Run ½" service & 2" service) found during the 2016 comprehensive inspection to have been improperly pressure tested were leak surveyed during 2016, 2017 and 2018, with no issued discovered.

   Staff determined that the actions taken by the Operator fail to address the stated violation. Staff advised the Operator that the four plastic service line which are in question were pressure tested at 25psj and are being operated at 25psi. 49CFR §192.513(c) state that the test requirements for plastic pipe state that the test pressure must be at least 150% of the maximum operating pressure or 50 psi (345 kPa) gauge, whichever is greater. In order to operate these lines at 25psi, they should have been pressure tested at 50psi".

   4th FOLLOW-UP INSPECTION: On April 16, 2020, Staff conducted a Follow-up Inspection of the Operators previously existing violation (Ref. Inspection Number DJ20-014), the City of Cordele sent an email on April 21, 2020, to the Director of Pipeline Safety asking for an extension for compliance due to COVID-19 virus. This violation has not been corrected.

   5th OPERATOR RESPONSE: In their response letter to Inspection number DJ20-014, dated October 15, 2020 the City of Cordele stated: "Cordele will replace the four service lines by March 31, 2021, using materials, construction, and testing sufficient to establish the appropriate MAOP".

   5th FOLLOW-UP INSPECTION: On February 22, 2021, Staff conducted a Follow-up Inspection of the Operators previously existing violation (Ref. Inspection Number JJ21-007), Staff found that the Operator is still working to replace these four service lines.

   6th OPERATOR RESPONSE: In their response letter to Inspection number JJ21-007, dated April 14, 2021, the City of Cordele stated: "Cordele has completed replacement of the service lines in-question. Documentation is available for Staff's review."

REVIEW OF OPERATOR RESPONSE: On December 6, 2022, the Operator emailed Staff documentation showing work orders for all four locations that the Operator re-pressure tested at 50 psi for compliance. The City of Cordele completed these pressure tests between March 15, 2021 and March 25, 2021, at the following locations:

- 313 N 7th Street
- 3213 E Old Hatley Rd
- 1901 S. Quail
- Ogburn Rd to Quail Run

Staff has reviewed the Operators response and the documents provided by the Operator via email and found that it adequately addresses this violation.

Staff determined that this violation could be cleared at this time.

PROBABLE VIOLATION CONTINUING

2. In regard to the Probable Violation of §192.619(a) which was cited in Inspection Number JS16-026; in that inspection Staff stated: "The City of Cordele was not able to produce records to substantiate the MAOP on their main lines."

   PROBABLE VIOLATION: The City of Cordele was not able to produce records to substantiate the MAOP on their main lines.

   3rd FOLLOW-UP INSPECTION: On May 28, 2019, Staff conducted a Follow-Up Inspection of the Operators previously existing probable violations (Ref. Inspection Number JS19-022), In this inspection, Staff Stated that: " Staff reviewed a 'City of Cordele Natural Gas System GASWorkS Model Summary' that was performed by Magnolia River Service, Inc. The model was developed in order for it to be utilized to determine internal system pressures, capacities and detect any potential pressure problems located in the system. The information contained in this report assisted Cordele in updating their Operations & Maintenance manual, Appendix T1 & T2 (System MAOP Description and MAOP Verification).

   Staff determined that the records provided by the Operator demonstrate that they conducted a review of a 5-year period of operating history, but do not demonstrate that the complete operating history of the pipeline segments have been reviewed. Staff notes that some of the records indicate installation dates from the 1950's. Staff determined that these records alone (Appendix T-1 and T-2) do not demonstrate that the Operator has considered the complete operating history of these pipeline segments as required under §192.614(a)(4). The records provided by the Operator also fail to demonstrate that the stated MAOP for these segments is in fact the lowest of the pressures which must be determined under §192.619(a) to establish a maximum allowable operating pressure".

   4th OPERATOR RESPONSE: In their response letter to Inspection Number JS19-022, dated January 30, 2020, the City of Cordele stated: "Cordele is currently reviewing its records and preparing documentation demonstrating that is has considered all requirements and provisions of 192.619, including the history of the relevant pipeline segments per 192.619(a)(4). This process will be completed within ninety days".

4th FOLLOW-UP INSPECTION: On April 16, 2020, Staff conducted Follow-Up Inspection of the Operators previously existing probable violations (Ref. Inspection Number DJ20-014), Staff found that the City of Cordele sent an email on April 21, 2020, to the Director of Pipeline Safety asking for an extension for compliance due to COVID-19 virus. Staff was unable to clear the violation.

5th OPERATOR RESPONSE: In their response letter to Inspection Number DJ20-014, dated October 15, 2020. "Cordele is currently reviewing its records and preparing documentation demonstrating that is has considered all requirements and provisions of 192.619, including the history of the relevant pipeline segments per 192.619(a)(4). This process has been delayed by the ongoing pandemic and will be completed within sixty days. Cordele will notify GPSC Staff upon Completion".

5th FOLLOW-UP INSPECTION: On February 22, 2021, Staff conducted a Follow-up Inspection of the Operators previously existing violation (Ref. Inspection Number JJ21-007), the Operator advised Staff that they had not completed their MAOP determinations. Staff requests that the Operator provide an update for this probable violation in their response to this inspection.

6th OPERATOR RESPONSE: In their response letter to Inspection number JJ21-007, dated April 14, 2021, the City of Cordele stated: "Cordele has completed MAOP determinations. Documentation is available for Staff's review."

REVIEW OF OPERATOR RESPONSE: On December 6, 2022, the Operator emailed Staff documentation showing the Operator's documented MAOPs. Staff review the MAOP pressure documents, Appendix T-1 MAOP Verification forms, and Appendix T-2 System MAOP Description forms sent by the City of Cordele. After Staff reviewed this information, Staff noticed a few discrepancies on the Operator's documented forms on several addresses (regulators) which showed the same information for each station; Staff needs the Operator to clarify this information. Staff also has some questions about the Fenn Road downstream of Gas Intermediate Plant which shows a MAOP of 60 psi on the MAOP pressure document and shows 25 psi on Appendix T-1 and Appendix T-2 forms (Which MAOP is correct?).

Staff has reviewed the Operators response and the documents provided by the Operator via email and found that it did NOT adequately addresses this violation. Staff is not able to verify the Operator's MAOPs due to discrepancies on the forms.

Staff determined that this violation could not be cleared at this time.

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:	)	
	)	
Clear Enforcement Letter	)	**DOCKET NO. 37039**
City of Cordele Gas System	)	
Inspection DJ22-054 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 *City of Cordele Gas Systems* 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

*Angela Redding, City Manager
City of Cordele Gas System
PO Box 569
501 N. Seventh Street
Cordele, GA 31010
angelaredding@cityofcordele.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