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

FILED
FEB 01 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 No. 37018

DOCKET# 37018
DOCUMENT# 193106

City of Adairsville Gas System
116 Public Square
Adairsville, GA 30103

REF: Comprehensive Inspection # KR22-016

☒ Certified Mail ☐ Regular Mail ☐ Email

Attention: Ms. Pamela Madison

On May 23, 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 KR22-016 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. 37018 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: KR22-016

OPERATOR: City of Adairsville Gas System

INVESTIGATOR: Kenny Rowe

INSPECTION DATE: May 23, 2022 REPORT MAILED DATE: January 30, 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
Under Consent Agreement	Operator is under a Consent Agreement.	JB18-005	5/30/2018
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	JB18-012	7/17/2018

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	KR22-016	5/23/2022
192.615(c)	Each operator shall establish and maintain liaison with appropriate fire, police, and other...	KR22-016	5/23/2022
192.479(a)	Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the...	KR22-016	5/23/2022
192.181(a)	Each high-pressure distribution system must have valves spaced so as to reduce the time to...	KR22-016	5/23/2022
192.615(a)(2)	Each operator shall establish written procedures to minimize the hazard resulting from a...	KR22-016	5/23/2022
192.455 (e)	Aluminum may not be installed in a buried or submerged pipeline if that aluminum is exposed to an...	KR22-016	5/23/2022
192.147(a)	Each flange or flange accessory (other than cast iron) must meet the minimum requirements of...	KR22-016	5/23/2022

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

From May 23rd to 26th, 2022, Staff reported to the City of Adairsville to perform a comprehensive inspection. The inspection consisted of an examination of the Operators O&M Manual, emergency plan, records and pipeline facilities for compliance with the minimum federal safety standards.

During the inspection, the Operator was represented by:
Steve Smith– Adairsville Gas Superintendent
Caleb Martin- Adairsville Utility Director
Timothy Paflas- Adairsville Gas Technician
Maurice Chaney– MGAG/SRCS (Consultant)

Commission Staff was represented by:
Kenny Rowe- Lead inspector
Jason Smith – Pipeline Safety Inspector
Brant Sweat– Pipeline Safety Inspector.

At the time of this inspection the City of Adairsville was under one (1) previously existing probable violation and a Consent Agreement. These violations were reviewed during KR22-015 follow up inspection.

NOTICE OF PROBABLE VIOLATION
As a result of this inspection Staff found that the Operator was in probable violation of the minimum federal safety standards; specifically:

1. 49CFR, §192.615 - Emergency plans.
   (c) Each Operator shall establish and maintain liaison with appropriate fire, police, and other public officials:
   (1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency;
   (2) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency;
   (3) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and,
   (4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.

   STAFF COMMENTS: During this inspection Staff found that the Operator failed to include all public officials as required for liaison, no liaison was established or maintained with utility operators in their service area.

   PROBABLE VIOLATION: The City of Adairsville failed to establish and maintain liaison with all required public officials, specifically utility operators in their service area for emergency preparedness.

2. 49CFR §192.605 - Procedural manual for operations, maintenance, and emergencies

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

PROBABLE VIOLATION: Based on the observed deficiencies indicated in this report, Staff determined that the Operator has failed to prepare and follow a manual of written procedures for conducting operations and maintenance activities and for emergency response.

The specific code sections, and noted deficiencies are identified below:

a) 49 CFR, §192.727- Abandonment or Deactivation of Facilities.
(a) Each operator shall conduct abandonment or deactivation of pipelines in accordance with the requirements of this section.

STAFFS COMMENTS: In the Operators Operations and Maintenance Manual in section 13-R 'Abandonment or Deactivation of Facilities' it states, "City of Adairsville will conduct abandonment or deactivation of pipelines in accordance with this paragraph. Each pipeline abandonment in place will be disconnected from all sources and supplies of gas, purged of gas and sealed at the ends''.

During this inspection the Operator was unable to provide records demonstrating that the contractor who abandoned and deactivated a section of main and a regulator station did so in accordance with 192.727 (a).

PROBABLE VIOLATION: The Operator failed to provide records demonstrating that the contractor who abandoned and deactivated a section of main and a regulator station did so in accordance with 192.727 (a) and their O&M Procedures.

b) 49CFR, §192.747 – Valve maintenance: Distribution systems.
(a) Each valve, the use of which may be necessary for the safe operation of a distribution system, must be checked and serviced at intervals not exceeding 15 months, but at least once each calendar year.

STAFF COMMENTS: The Operators Operation and Maintenance Manual in section 13-W 'Valve Maintenance-Distribution Systems' states, "Each valve, the use of which may be necessary for the safe operation of a distribution system, must be checked and serviced at intervals not exceeding 15 months, but at least once each calendar year". However, the city of Adairsville failed to perform a valve inspection in 2019 and failed to inspect all critical valves in 2020 according to records.

PROBABLE VIOLATION: The city of Adairsville failed to follow their procedures for ensuring that each valve, the use of which may be necessary for the safe operation of a distribution system, is checked and serviced at intervals not exceeding 15 months, but at least once each calendar year.

c) 49CFR, §192.743 – Pressure limiting and regulating stations: Capacity of relief devices.
(a) Pressure relief devices at pressure limiting stations and pressure regulating stations must have sufficient capacity to protect the facilities to which they are connected. Except as provided in§ 192.739(b), the capacity must be consistent with the pressure limits of§ 192.201(a). This capacity must be determined at intervals not exceeding 15 months, but at least once each calendar year, by testing the devices in place or by review and calculations.

STAFF COMMENTS: PHMSA comp. baseline Records inspection form question states: #2. Pressure Limiting and Regulating Stations Capacity of Relief Devices - Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required?

While reviewing annual regulator station inspection records for the Town Border station Staff observed the regulator (Rockwell O15) with capacity of 457mcfh and the relief device (Consolidated 1995JC) with a capacity of 422mcfh. {Note: the capacity of the relief should be larger than the regulator}

PROBABLE VIOLATION: The Operators Gas Town border regulator station's relief device lack sufficient capacity to protect the downstream pipeline as required by §192.743(a).

3. 49CFR §192.479 Atmospheric corrosion control: General.
(a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere,

STAFF COMMENTS: During this inspection Staff found numerous locations throughout the system in need of maintenance, cleaning and coating of above ground facilities. At the Town Border station (elementary school) Staff observed coating on the piping in unsatisfactory condition. Also, Staff inspected Adairsville's Take Station and determined that it is in need of cleaning & coating due to the piping and coating being in an unsatisfactory condition.

Staff also observed the Prosperity Way and the Princeton reg. station(s) in need of paint or protective coating on the lower portion of the piping. Whoever painted these stations neglected to coat the lower portion of the station with paint.

PROBABLE VIOLATION: Adairsville Gas failed to clean and coat each portion of their pipeline that is exposed to the atmosphere as required by §192.479.

4. §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.

   STAFF COMMENTS: During this inspection Staff observed the Take Station with bolts on flanges that did not completely extend/pass through the nuts on flanges.

   PROBABALE VIOLATION: Adairsville Gas failed to ensure that each of their flanges or flange accessories meet the minimum requirements of ASME/ANSI B 16.5 and MSS SP44 as required by §192.147(a)

NOTICE OF AMENDMENT
As a result of this inspection Staff found that the Operator was in probable violation of the minimum federal safety standards; specifically,

1. 49 CFR, §192.615– Emergency Plans
   (a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:
   (2) Establishing and maintaining adequate means of communication with the appropriate public safety answering point (i.e., 9-1-1 emergency call center), where direct access to a 9-1-1 emergency call center is available from the location of the pipeline, and fire, police, and other public officials. Operators may establish liaison with the appropriate local emergency coordinating agencies, such as 9- 1-1 emergency call centers or county emergency managers, in lieu of communicating individually with each fire, police, or other public entity. An operator must determine the responsibilities, resources, jurisdictional area(s), and emergency contact telephone number(s) for both local and out-of-area calls of each Federal, State, and local government organization that may respond to a pipeline emergency, and inform such officials about the operator's ability to respond to a pipeline emergency and the means of communication during emergencies.

   STAFF COMMENTS: During this inspection Staff found no process had been established and planned with the Operators fire, police and public officials in order to maintain communication in the event of a natural disaster as required under 192.615(a)(2). When Staff asked Operator personnel they stated they had no way of maintaining communication if they lost their cell or land line service. The Operator did state that they could use two-way radios from the fire department if they needed to in an emergency, however this would be after an emergency has already occurred and the Operator has met with emergency officials at the emergency command center. Staff advised Operator personnel to pursue that option and plan with their fire, police and public officials to ensure it would work with them and to implement the process in their emergency plan in section V. of their plan for natural disasters.

   REQUIRED AMENDMENT: The Operator must amend their procedures to ensure they can maintain communication with fire, police and public officials in the event they were to lose their cell or land line services.

2. 49CFR, §192.615 - Emergency plans.
   (c) Each Operator shall establish and maintain liaison with appropriate fire, police, and other public officials:
   (1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency;
   (2) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency;
   (3) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and,
   (4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.

   STAFF COMMENTS: During this inspection Staff found that the Operator failed to include all public officials as required for liaison. Staff reviewed the listing of utility operators from GA-811 and found that there are approximately 65 other utility companies that are operating in the same three county area. The Operator has not determined which of these utilities are in their area and should be included in their liaison activities.

   REQUIRED AMENDMENT: The City of Adairsville must amend their procedures to ensure that they are establishing and maintaining liaison with all required public officials, specifically utility operators in their service area for emergency preparedness.

3. §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 City of Adairsville 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 Section 9-F of their O&M procedures indicates that they do not have buried or submerged amphoteric metal, however, Staff found no indication that the City of Adairsville prevents the installation of aluminum in their system.

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

4) 49 CFR, §192.181 - Distribution line valves:
   (a) Each high-pressure distribution system must have valves spaced so as to reduce the time to shut down a section of main in an emergency. The valve spacing is determined by the operating pressure, the size of the mains, and the local physical conditions.

STAFFS COMMENTS: During this inspection the Operator was unable to provide a process for the placement of distribution line valves in accordance with Part 192.181. Because the Operator could not define where these valves are required Staff could not determine if the Operator could perform an emergency shutdown and/or pressure reduction in any section of their pipeline system if it were necessary to minimize hazards to life or property as required by §192.615(a)(6).

Because the Operator could not demonstrate an actual process of how they determine where to install specific valves, Staff cannot determine if the Operator has complied with the requirements of §192.181(a), or if they can meet the requirements of §192.615(a)(6).

REQUIRED AMENDMENT: The City of Adairsville must amend their procedures to address the placement of distribution line valves for their system.

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 Adairsville 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 penalty/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(b)	§192.747(a)	Emergency Valves	$5,000.00
TOTAL PROPOSED PENALTY			$5,000.00

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.

OPERATOR RESPONSE FORM

Operator Name: CITY OF ADAIRSVILLE GAS SYSTEM

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37018

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 Proposed Civil	)	**DOCKET NO. 37018**
Penalty and Notice of Amendment	)	
City of Adairsville Gas System	)	
Inspection KR22-016 on May 23, 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 Adairsville 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

*Pamela Madison, City Manager
City of Adairsville Gas System
116 Public Square
Adairsville, GA 30103
pmadison@adairsvillega.net

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

Respectfully Submitted this 7th day of February 2023:

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