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FACILITIES PROTECTION UNIT DIRECTOR

Georgia Public Service Commission

(404) 463-6526
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244 Washington Street, SW
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DOCKET# 37101
DOCUMENT# 194421

Docket No. 37101

City of Winder Gas Department
P. O. Box 566
Winder, GA 30680

REF: DIMP (Annual Review) Inspection # DJ23-001

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. David Maynard

On January 18, 2023, a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an inspection of your gas system. The enclosed inspection report numbered DJ23-001 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. 37101 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: DJ23-001

OPERATOR: City of Winder Gas Department

INVESTIGATOR: Daphne Jones

INSPECTION DATE: January 18, 2023 REPORT MAILED DATE: May 9, 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 DIMP Annual Review of the Operators Distribution Integrity Management Program (DIMP) for compliance with the minimum federal standards in 49CFR Part 192, SubPart P.

2. CONTINUING VIOLATIONS

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

CITY OF WINDER / ANNUAL DIMP REVIEW
INSPECTION NUMBER DJ23-001 / DOCKET NUMBER 37101

On January 9, 2023, Staff requested information pertaining to the City of Winder Gas System DIMP Plan. On January 12-18, 2023, the City of Winder sent requested documentation back to Staff. On January 24, 2023, Staff reported to the City of Winder Gas Department to perform an Annual Review of their Distribution Integrity Management Program (DIMP) as required under the PHMSA State Programs Guidelines.

During this review the Operator was represented by:
Tabatha Knight – Utility Operations Director
Samantha McDaniel– Regulatory Compliance Officer
Ted Tillery – Construction & Maintenance Supervisor
Bruce Bagnasco – MGAG/SRCS (Consultant)

Commission Staff was represented by:
Daphne Jones – Lead Inspector
Joe Jones – Pipeline Safety Inspector
Daniel Clemmons – Pipeline Safety Inspector
Kenny Rowe – Pipeline Safety Inspector
Michelle Thebert – Director of Pipeline Safety

At the time of this inspection the City of Winder Gas Department was under no previously existing probable violations.

During this inspection, Staff reviewed the City of Winder's Gas Department Distribution Integrity Management (DIMP) plan and procedures which includes all previous document versions of the plan and the changes that have been implemented since the initial version.

LETTER OF CONCERN

During this inspection, Staff reviewed the information provided by the Operator and found that their DIMP Plan was last reviewed on August 13, 2020, plan version 5.1.1. Staff then discussed the following items with Winder representatives:

1. PHMSA 7100 – Part C Leak Data (2012-2021) – Concerns on CY2012-CY2015.
2. PHMSA 7100 – Part D Excavation Damage Data --- No issues
3. Operators currently identified risk/threats. No issues.
4. Excavation Damages: #1-Third Party Damages, #2 -Entire System, #3 – Mislocating Lines:
   - Staff reviewed several works orders at random in Hiper-Web system.
   - Excavation damages reviewed (2019-2022) – No issues.
   - Equipment Failure (Pulled 3 from 2020) – No issues.
   - Material or Weld Failure (2019-2022) – No issues.
   - Incorrect Operations (2018-2019) – No issues.
5. Winder base line tracking. No issues.
6. Grade Leaks; Winder repairs leaks according to leak standards.
7. Cast Iron; Per Winder, no cast iron in their system.
8. Master Meters; Winder has no master meters
9. Winder Re-evaluation of plan every five years --- No issues.
10. GUFPA PVs reporting verified from 2012-2022. No issues.
11. Cross Bores: Staff reviewed DIMP Plan, Section 4.2.8 Other Threats: The City of Winder Operator overrode ranking with this explanation:
    "The CITY OF WINDER's sewer facilities have been mapped and GPS coordinates are logged thus making the sewer facilities locatable. The Ga. Dig Law requires that all underground facilities be located by the facility owner. The Dig Law further requires that the excavator expose any facility being crossed by directional drilling. The CITY OF WINDER keeps and maintains its GIS database; locate personnel have access to this system via hard copy, online, and via tablets in the

field. Any discrepancies found in the field are communicated back to GIS personnel so that the GIS database is accurate and current." --- No issues.

As a result of this review Staff identified deficiencies with the City of Winder's DIMP program, specifically:

1. Staff is concerned that the Operator could not show all ten years of leak data under the 7100 Part C – Leak Data information. The operator could not provide the records, no work-orders, nor break-out information for leaks from CY2012 – CY2015 or whether it was steel or plastic. The operator could only produce the leak data information from CY2016 – CY2021.

   The Operator stated that prior to Hiper-Web for CY2012-2015, the City of Winder had completed all gas work orders in a system called Cityworks. In 2016, After relocating to their new facility located at 138 Sweetwater Trail, Winder, GA 30680, they found out that none of the data nor work orders could be transferred from Cityworks into Hiper-Web because the Cityworks system had been completely disbanded; Furthermore, in CY2018, the City of Winder experienced a ransomware attack and many of Winder's work orders were lost.

This concludes Staff's Annual Review of Winder's Distribution Integrity Management Program (DIMP). Please contact the Director of Pipeline Safety if you have any questions or concerns at 404-985-4271 or michellet@psc.state.ga.us.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

IN THE MATTER OF:	)	
	)	
Letter of Concern	)	**DOCKET NO. 37101**
City of Winder Gas Department	)	
Inspection DJ23-001 on January 18, 2023	)	
	)	

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 Winder 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 David Maynard, Mayor
City of Winder Gas Department
P.O. Box 566
Winder, GA 30680
david.maynard@cityofwinder.com

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

Respectfully Submitted this 16th day of May 2023:

Cathy Nesbitt

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