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DOCKET# 37072
DOCUMENT# 216310

Docket No. 37072

City of Moultrie Gas Department
P. O. Box 3368
Moultrie, GA 31776
DELIVERED VIA E-MAIL

RE: Inspection Report DL23-009

Dear Mr. Pete Dillard -

Based on review of City of Moultrie Gas Department's response, discussions with Pipeline Safety Staff and/or Operator, and/or any additional information provided for Inspection Report DL22-004, I have cleared the following Enforcement Actions:

Violation	Description	Inspection#
192.465(d)	Each operator shall take prompt remedial action to correct any deficiencies indicated by the...	DL22-004
192.455 (e)	Aluminum may not be installed in a buried or submerged pipeline if that aluminum is exposed to an...	DL22-004

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 Moultrie Gas Department 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: DL23-009

OPERATOR: City of Moultrie Gas Department

INVESTIGATOR: David Lewis

INSPECTION DATE: February 15, 2023 REPORT MAILED DATE: November 6, 2023

Any questions concerning this report may be directed to the above address or by telephoning (404) 463-6526.

1. PURPOSE OF INSPECTION

Conduct a review of the Operator's response letter to previous probable violations.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.181	Distribution line valves.	DL22-004	9/13/2022
192.625(f)	To assure the proper concentration of odorant in accordance with this section, each operator must...	DL22-004	9/13/2022

3. CLEARED VIOLATIONS

Cleared on 2/15/2023

Violation	Description	Inspection#	Date
192.465(d)	Each operator shall take prompt remedial action to correct any deficiencies indicated by the...	DL22-004	9/13/2022
192.455 (e)	Aluminum may not be installed in a buried or submerged pipeline if that aluminum is exposed to an...	DL22-004	9/13/2022

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

FOR FILE ONLY AFTER CLEARING ENFORCEMENT ACTIONS LETTER

SEE ATTACHED INSPECTION REPORT

CITY OF MOULTRIE GAS DEPARTMENT / REVIEW OPERATOR'S RESPONSE
INSPECTION NUMBER DL23-009 / DOCKET NUMBER 37072

On February 15, 2023, Staff reviewed the City of Moultrie's response letter which was submitted for Inspection Number DL22-004.

This review was conducted by David Lewis - Pipeline Safety Inspector – Lead.

During this review, Staff determined the following:

PROBABLE VIOLATION CLEARED

1) In regard to the Probable Violation of 49CFR §192.465 which was cited in Inspection Number DL22-004, Staff stated: During this inspection (DL22-004) Staff found in the Operators Procedures Manual it states: "(a) Each cathodic protection system required by this Section will provide a level of cathodic protection that complies with one or more of the applicable criteria contained in Appendix D of Part 192. If none of these criteria is applicable, the cathodic protection system will provide a level of cathodic protection at least equal to that provided by compliance with one or more of these criteria. Selection of applicable Appendix D criteria will be based on the following:

   A negative (cathodic) potential of at least 850 mV with the cathodic protection applied is required. This potential is measured with respect to a saturated copper/copper sulfate reference electrode contacting the electrolyte. Voltage drops (IR) other than those across the structure-to-electrolyte boundary must be considered for valid interpretation of this potential measurement.

   Staff reviewed annual corrosion records and found pipe-to-soil readings at 828 1st St. and 604 1st St. on 2019 and 2020 periodic surveys that did not meet the established criteria found in the Operators Procedures Manual and according to 49CFR §192.465.

   PROBABLE VIOLATION: The City of Moultrie Gas Department failed to take prompt remedial action to correct discrepancies found during monitoring of their cathodic protection system.

   REVIEW OF OPERATOR RESPONSE: On February 14, 2023 the Operator emailed a response stating: The City of Moultrie has resolved both issues cited in this Notice of Probable Violation. The steel service line at 828 1st Street NW was inserted with polyethylene pipe and this location has been removed from the cathodic protection system monitoring report. At 604 1st Street NW, the leads to a cathodic protection test station were reattached and subsequent readings have been in compliance since 2020.

   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.

2) In regard to the Probable Violation of 49CFR, §192.455 which was cited in Inspection Number DL22-004, Staff stated: The City of Moultrie's 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 Moultrie prevents the installation of aluminum in their system.

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

REVIEW OF OPERATOR RESPONSE: On February 14, 2023 the Operator emailed a response stating: The City of Moultrie has revised its Operations and Maintenance Manual to state that aluminum pipeline facilities will not be installed underground in its natural gas system.

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

1) In regard to the Probable Violation of 49CFR §192.625(f) which was cited in Inspection Number DL22-004, Staff stated: During this inspection (DL22-004) Staff found that: The Heath Odorator which was being used by the Operator was last calibrated on July 13, 2017 and was due for calibration on October 13, 2018. Subsequent to this finding, Staff reviewed the Operators odorant records and determined the Operator had been taking monthly readings in all of their odorant test stations since the calibration due date expired. The Operators OPM manual states on page 594 under the calibration each instrument used for periodic odorization sampling shall be calibrated in accordance with the manufacturer's recommended operating instructions. According to the Heath factory manual, annual calibration is recommended by a trained Heath factory or factory trained personnel.

   PROBABLE VIOLATION: The City of Moultrie failed to ensure that their natural gas system was properly odorized in accordance with the requirements of 49CFR §192.625(f).

   Staff proposed a penalty of $5,000.00

   REVIEW OF OPERATOR RESPONSE: On February 14, 2023 the Operator emailed a response stating: The City of Moultrie sent the subject device to the manufacturer for calibration. It was returned on October 18, 2022. Also, for comparison, the City of Moultrie sampled odorant using a calibrated device obtained another Operator and found that the odorant levels were comparable on the two machines.

   Staff has reviewed the Operators response and the documents provided by the Operator and believes that this violation should be cleared in person so we can discuss the fact that comparing their machine to another machine is irrelevant to this violation.

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

2) In regard to the Probable Violation of 49 CFR, §192.181 which was cited in Inspection Number DL22-004, Staff stated: 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 §191.181(a), or if they can meet the requirements of §192.615(a)(6).

During this inspection Staff found no procedures for placement of valves for emergency response and regulator stations. Operator was unable to provide a process in their emergency plan how, when or where an emergency shutdown would take place in any section of their system. Also, the Operator's emergency valves listed in their emergency plan do not identify which valve or valves shuts off a particular pipeline section in the event of an emergency.

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

OPERATOR RESPONSE: The City of Moultrie has implemented a Construction Manual that includes provisions for determining the placement of valves in newly constructed facilities. Also, the City of Moultrie is developing a map showing the locations of valves and the facilities controlled by these valves with completion expected by May 1, 2023.

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. 37072**
City of Moultrie Gas Department	)	
Inspection DL23-009 on February 15, 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 Moultrie 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

* Pete Dillard, City Manager
City of Moultrie Gas Department
P. O. Box 3368
Moultrie, GA 31776
pete.dillard@moultriega.com

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

Respectfully Submitted this 9th day of November 2023:

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