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Georgia Public Service Commission

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Docket No. 37039

DOCKET # 37039
DOCUMENT # 217477

City of Cordele Gas System
PO Box 569
501 N. Seventh Street
Cordele, GA 31010

REF: Follow Up Inspection # DJ23-018

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Ms. Angela Redding

On April 20, 2023, a representative of the Georgia Public Service Commission Pipeline Safety/Facilities Protection Office conducted an on-site inspection of your gas system and found that previously identified probable violation(s) of the Pipeline Safety Regulations have either been cleared or are continuing, as identified below.

- ☒ Previously existing probable violation(s) has/have been cleared.
- ☐ Previously existing probable violation(s) still exist.
- ☐ Additional Enforcement
  - ☐ Notice of Proposed Violation
  - ☐ Notice of Proposed Violation with Proposed Civil Penalty
  - ☐ Warning Letter
  - ☐ Letter of Concern
  - ☐ Observed Issue
- ☐ Consent Agreement Pending

The enclosed inspection report numbered DJ23-018 is provided for your information and file.

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. 37039 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: DJ23-018

OPERATOR: City of Cordele Gas System

INVESTIGATOR: Daphne Jones

INSPECTION DATE: April 20, 2023 REPORT MAILED DATE: February 8, 2024

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 follow-up inspection of the Operators previously existing probable violations.

2. CONTINUING VIOLATIONS

3. CLEARED VIOLATIONS

Cleared on 4/20/2023

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

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

CITY OF CORDELE GAS SYSTEM / FOLLOW-UP INSPECTION
INSPECTION NUMBER DJ23-018 / DOCKET NUMBER 37039

On April 20-24, 2023, Staff reported to the City of Cordele to perform a follow-up inspection of the Gas System's previously existing probable violations.

During this inspection, the Operator was represented by:
Tina Bearden - Gas Superintendent
Chris Welborn - SRCS/MGAG (Consultant)

Commission Pipeline Safety Staff was represented by:
Daphne Jones - Lead Inspector
Joe Jones- Pipeline Safety Inspector
Daniel Clemmons- Pipeline Safety Inspector

At the time of this inspection the City of Cordele Gas System was under one (1) previously existing probable violation. Staff reviewed these probable violations with the Operator and determined that:

PROBABLE VIOLATION CLEARED

1. 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."

   1st OPERATOR RESPONSE: In a response letter to Inspection #JS16-026 dated February 9, 2017, the Operator stated: Cordele does not contest the violation alleged or request an informal conference to discuss this NOPV and files the following written plan of action outlining the corrective measures that will be taken to achieve compliance and when compliance is anticipated: "Cordele has documented the MAOP and method of establishment for each portion of its system."

   1st FOLLOW-UP INSPECTION: On December 6, 2017, Staff reported to the City of Cordele Gas Department to conduct an Operator Qualification Protocol 9 inspection (Ref. Inspection Number JL17-051). In that inspection Staff stated that: "At the time of this inspection, the City of Cordele was under 10 (ten) previously existing probable violations. Staff did not review these existing violations during this inspection because of the time required to review them. A separate inspection will be needed."

   2nd OPERATOR RESPONSE: In a response letter to Inspection Number JL17-051, dated January 18, 2019, the Operator stated: "Cordele has documented the MAOP and method of establishment for each portion of its system."

   2nd FOLLOW-UP INSPECTION: On November 13, 2018, Staff reported to the City of Cordele Gas Department to conduct an Operator Qualification Protocol 9 inspection (Ref. Inspection Number AT18-043). In that inspection, Staff stated: "At the time of this inspection the City of Cordele was under 10 previously existing probable violations. Because this inspection was specifically to perform personnel evaluation these probable violations were not reviewed during this inspection."

   3rd OPERATOR RESPONSE: In a response letter to Inspection Number AT18-043, dated April 3, 2019, the Operator stated: "Cordele has documented the MAOP and method of establishment for each portion of its system."

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 has 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 were 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, Staff conducted a review of Operator's response to previously existing violations (Ref. Inspection Number JJ21-007), 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 in 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 were not able to verify the Operator's MAOPs due to discrepancies in the forms. Staff determined that this violation could not be cleared at this time.

6th FOLLOW-UP INSPECTION: On April 20-24, 2023, Staff conducted a Follow-up Inspection of the Operators previously existing violation (Ref. Inspection Number DJ22-054), the Operator advised Staff that they had completed their updated MAOP determinations. The Operator also provided clarification on the Fenn Road downstream of Gas Intermediate Plant which now shows a MAOP of 25 psi.

Staff determined that this violation could 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:	)	
	)	
Cleared Violation Report	)	**DOCKET NO. 37039**
City of Cordele Gas System	)	
Inspection DJ23-018 on April 20, 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 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 14th day of February 2024:

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