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DOCKET# 37074
DOCUMENT# 217479

Docket No. 37074

City of Ocilla Gas Department
PO Box 626
113 North Erwin St
Ocilla, GA 31774

REF: Follow Up Inspection # JJ23-023

☒ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Melvin D. Harper II

On June 22, 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 JJ23-023 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. 37074 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: JJ23-023

OPERATOR: City of Ocilla Gas Department

INVESTIGATOR: Joe Jones

INSPECTION DATE: June 22, 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

Violation	Description	Inspection#	Date
192.13(c)	Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and...	AT19-022	5/29/2019
199.241	Training for supervisors.	JS19-034	7/23/2019
199.117	Recordkeeping	JS19-034	7/23/2019
40.333	What records must employers keep?	JS19-034	7/23/2019
199.105(c)(6)	The operator shall randomly select a sufficient number of covered employees for testing during...	JS19-034	7/23/2019
199.115(a)	The operator remains responsible for ensuring that the requirements of this part are complied with	JS19-034	7/23/2019
199.113(c)	Supervisory Personnel Training (Drug)	JS19-034	7/23/2019
40.11	What are the general responsibilities of employers under this regulation?	JS19-034	7/23/2019
40.15(b)	As an employer, you are responsible for ensuring that the service agents you use meet the...	JS19-034	7/23/2019
515-9-3-.08	Written Formal Notice of Violation	JJ20-015	3/16/2020
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	JJ20-016	3/10/2020
192.603(c)	General - The Associate Administrator or the State Agency that has submitted a current...	JJ22-015	3/14/2022
192.613(a)	Continuing Surveillance - Each operator shall have a procedure for continuing surveillance of...	JJ22-016	3/15/2022
192.703(c)	Hazardous leaks must be repaired promptly.	JJ22-016	3/15/2022
192.199(h)	Except for a valve that will isolate the system under protection from its source of pressure...	JJ22-016	3/15/2022
192.481(c)	If atmospheric corrosion is found during an inspection, the operator must provide protection...	JJ22-016	3/15/2022
192.455 (e)	Aluminum may not be installed in a buried or submerged pipeline if that aluminum is exposed to an...	JJ22-016	3/15/2022
192.605(b)(2)	Controlling corrosion in accordance with the operations and maintenance requirements of Subpart...	JJ22-016	3/15/2022
192.723(b)	The type and scope of the leakage control program must be determined by the nature of the...	JJ22-016	3/15/2022
192.147(a)	Each flange or flange accessory (other than cast iron) must meet the minimum requirements of...	JJ22-016	3/15/2022

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

CITY OF OCILLA / FOLLOW-UP INSPECTION
INSPECTION NUMBER JJ23-023 / DOCKET NUMBER 37074

From June 26-29, 2023, Staff conducted a follow-up inspection of the City of Ocilla Gas System's previously existing probable violations.

During this inspection, the Operator was represented by:
Joe Saxon - City Manager
Cornelius Hall – Public Works Superintendent
Jacob Edwards – Gas Superintendent
Lucile Middlebrooks – City Clerk
Peter Schultz – Harp & Associates (Consultant)

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

At the time of this inspection the City of Ocilla was under 21 previously existing probable violations. These violations include proposed civil penalties for these items:

Inspection Number	Code Citation	Proposed Penalty
JJ22-016	§192.613(a)	$2,500.00
AT19-022	192.13.(c)	$2,500.00
JS19-034	199.105(c)(6)	$2,500.00
JJ20-016	192.605(a)	$2,500.00
JJ22-016	192.703(c)	$2,500.00
JJ22-016	192.199(h)	$2,500.00
JJ22-016	192.481(c)	$2,500.00
JJ22-016	192.723(b)	$2,500.00
TOTAL OUTSTANDING PENALTIES		$22,500.00

Staff reviewed these probable violations with the Operator and determined that:

PROBABLE VIOLATION CONTINUING

1. In regard to the Probable Violation of 49CFR §192.13(c) which was cited in Inspection Number AT19-022; in that inspection Staff stated "The City of Ocilla failed to follow its procedures required by its public awareness program and to establish its written plan with all requirements under this part. The specific deficiencies are identified as Items # 1.05, 2.04, 2.06, and 4.06 from the PHMSA Form 21 PAP Inspection Checklist. Staff notes that Items 2.04, 2.06, and 4.06 were also found to be deficient in the City of Ocilla's previous PAP inspection. (Ref: Inspection Number JM13-040)

   PROGRAM DEFICIENCIES

   (a) Question 1.05 – Message Frequency and Message Delivery
   Does the operator's program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas in which the operator transports gas, hazardous liquid, or carbon dioxide?

   COMMENTS: Operators plan stated customers message frequency would be once a year, non-customers message frequency was not defined.

(b) Question 2.04 – Baseline Message Delivery Frequency
Did the operator's delivery for materials and messages meet or exceed the baseline frequencies specified in API RP 1162, Table 2-1 through Table 2.3? If not, did the operator provide justification in its program or procedural manual?

COMMENTS: Operator failed to deliver messages twice a year to their customers as required under API RP 1162.

(c) Question 2.06 Maintaining Liaison with Emergency Response Officials
Did the operator establish and maintain liaison with appropriate fire, police, and other public officials to: learn the responsibility and resources of each government organization that may respond, acquaint the officials with the operator's ability in responding to a pipeline emergency, identify the types of pipeline emergencies of which the operator notifies the officials, and plan how the operator and other officials can engage in mutual assistance to minimize hazards to life or property?

COMMENTS: Operator failed to maintain liaison with all of their identified Emergency Officials.

(d) Question 4.06 Measure Bottom-Line Results
In evaluating its public awareness program effectiveness, did the operator attempt to measure bottom-line results of its program by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures? Did the operator consider other bottom-line measures, such as the affected public's perception of the safety of the operator's pipelines?

COMMENTS: Operator failed to include in their evaluation process the Affected Public audience perception of the safety of the Operators' pipeline system.

OPERATOR RESPONSE: The City of Ocilla failed to provide a response to Inspection Number AT19-022.

FIRST FOLLOW-UP INSPECTION: On March 16, 2020, Staff conducted a follow-up inspection of the Operators previously existing probable violations. In that inspection Staff stated: "During this inspection (JJ20-015) the Operator stated that the City of Ocilla has not received Inspection Number AT19-022 so they have not responded. Because the Operator had not responded, and the Operators personnel had not seen the written report, Staff did not follow-up on this violation. Subsequent to this inspection Staff verified that a copy of this report was emailed to the Operator on 12/9/2019, and a hard copy was sent out on 12/10/2019."

OPERATOR RESPONSE: The City of Ocilla failed to provide a response to Inspection Number JJ20-015.

SECOND FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Insp, # JJ22-017. In this inspection Staff stated: "During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers AT19-022, JS19-034 or JJ20-015, or taken any actions to address the probable violations or associated civil penalties in those reports."

OPERATORS SECOND RESPONSE: On August 2, 2022, the City of Ocilla responded to Inspection Number JJ22-017, however they failed to address any specific violations in their response.

THIRD FOLLOW-UP INSPECTION: During this inspection (JJ23-023) Staff determined that the City of Ocilla could not demonstrate that they have taken any action to address this violation.

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

2. In regard to the probable violation of §199.241 which was sited in Inspection Number JS19-034; in that inspection Staff Stated: "The City of Ocilla failed to maintain records which demonstrate that their supervisors have been trained as required by §199.241."

   OPERATORS RESPONSE: Staff found no response letter from the City of Ocilla for Inspection Number JS19-034.

   FIRST FOLLOW-UP INSPECTION: On March 16, 2020, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Insp # JJ20-015) In that inspection Staff stated: "During this inspection (JJ20-015) Staff found that the Operator has not responded to the above Probable Violation stated in JS19-034. Subsequent to this inspection Staff verified that a copy of this report was emailed to the Operator, and a hard copy was sent out on 1/27/2020."

   OPERATOR RESPONSE: Staff found no response letter from the City of Ocilla for Inspection Number inspection JJ20-015.

   SECOND FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Insp # JJ22-017) In this inspection Staff stated: "During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers JS19-034 or JJ20-015 or taken any actions to address the probable violations or associated civil penalties in those reports."

   OPERATORS FIRST RESPONSE: On August 2, 2022, the Commission received a response to Inspection Numbers JJ22-017 and JJ22-015 which was dated July 19, 2022. In their response letter the City of Ocilla failed to address any specific outstanding violations; however, they requested the Commission "stay any monetary penalties for a period of 18 months to allow the transition and corrections to have time to take effect".

   THIRD FOLLOW-UP INSPECTION: During follow-up inspection (JJ23-023) that took place on June 28, 2023; Staff determined that the City of Ocilla has records which demonstrate that their supervisors received at least 60 minutes of training on the physical, behavioral, speech, and performance indicators of probable alcohol misuse as required.

   While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation, therefore Staff determined that this violation could not be cleared at this time.

3. In regard to the probable violation of §199.117(a)(1) which was cited in Inspection Number JS19-034; in that inspection Staff stated: "The City of Ocilla failed to maintain records which demonstrate that their collection process was performed as required under Part 40 and Part 199."

   OPERATOR RESPONSE: Staff found no response letter from the City of Ocilla for Inspection Number JS19-034.

   FIRST FOLLOW-UP INSPECTION: On March 16, 2020, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Insp # JJ20-015) In that inspection Staff stated: "During this inspection (JJ20-015) Staff found that the Operator has not responded to the above Probable Violation stated in JS19-034. Subsequent to this inspection Staff verified that a copy of this report was emailed to the Operator, and a hard copy was sent out on 1/27/2020."

   OPERATOR RESPONSE: Staff found no response letter from the City of Ocilla for Inspection Number inspection JJ20-015.

   SECOND FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Insp # JJ22-017) In that inspection Staff stated: "During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers JS19-034 or JJ20-015 or taken any actions to address the probable violations or associated civil penalties in those reports."

   OPERATORS FIRST RESPONSE: On August 2, 2022, the Commission received a response to Inspection Numbers JJ22-017 and JJ22-015 which was dated July 19, 2022. In their response letter the City of Ocilla failed to address any specific outstanding violations; however, they requested the Commission "stay any monetary penalties for a period of 18 months to allow the transition and corrections to have time to take effect".

   THIRD FOLLOW-UP INSPECTION: During this inspection (JJ23-023) Staff determined that the City of Ocilla maintain records which demonstrate that their collection process was performed as required under Part 40 and Part 199.

   While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation, therefore Staff determined that this violation could not be cleared at this time.

4. In regard to the probable violation of §199.117(a)(4) which was cited under Inspection Number JS19-034; in that inspection Staff stated: "The City of Ocilla failed to maintain records which demonstrate that their supervisors have been trained as required by §199.117(a)(4)."

   OPERATOR RESPONSE: Staff found no response letter from the City of Ocilla for Inspection Number JS19-034.

   FIRST FOLLOW-UP INSPECTION: On March 16, 2020, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Insp # JJ20-015) In that inspection Staff stated: "During this inspection (JJ20-015) Staff found that the Operator has not responded to the above Probable Violation stated in JS19-034. Subsequent to this

inspection Staff verified that a copy of this report was emailed to the Operator, and a hard copy was sent out on 1/27/2020."

OPERATOR RESPONSE: Staff found no response letter from the City of Ocilla for Inspection Number inspection JJ20-015.

SECOND FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's previously existing Probable Violations. (Ref. Insp # JJ22-017) In that inspection Staff stated: "During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers JS19-034 or JJ20-015 or taken any actions to address the probable violations or associated civil penalties in those reports."

OPERATORS FIRST RESPONSE: On August 2, 2022, the Commission received a response to Inspection Numbers JJ22-017 and JJ22-015 which was dated July 19, 2022. In their response letter the City of Ocilla failed to address any specific outstanding violations; however, they requested the Commission "stay any monetary penalties for a period of 18 months to allow the transition and corrections to have time to take effect".

THIRD FOLLOW-UP INSPECTION: During this inspection (JJ23-023) Staff determined that the City of Ocilla has records which demonstrate that their supervisors have been trained as required by §199.117(a)(4).

While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation, therefore Staff determined that this violation could not be cleared at this time.

5. In regard to the probable violation of §40.333(a)(2) which was cited under Inspection Number JS19-034; in that inspection Staff stated: "The City of Ocilla failed to obtain and maintain previous employer records regarding drug test results of employees." (Ref, PHMSA Inspection Question F.01.a / drug records)

   OPERATOR RESPONSE: Staff found no response letter from the City of Ocilla for Inspection Number JS19-034.

   FIRST FOLLOW-UP INSPECTION: On March 16, 2020, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Insp # JJ20-015) In that inspection Staff stated: "During this inspection (JJ20-015) Staff found that the Operator has not responded to the above Probable Violation stated in JS19-034. Subsequent to this inspection Staff verified that a copy of this report was emailed to the Operator, and a hard copy was sent out on 1/27/2020."

   OPERATOR RESPONSE: Staff found no response letter from the City of Ocilla for Inspection Number inspection JJ20-015.

   SECOND FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's previously existing Probable Violations. (Ref. Insp # JJ22-017) In that inspection Staff stated: "During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers JS19-034 or JJ20-015 or taken any actions to address the probable violations or associated civil penalties in those reports."

OPERATORS FIRST RESPONSE: On August 2, 2022, the Commission received a response to Inspection Numbers JJ22-017 and JJ22-015 which was dated July 19, 2022. In their response letter the City of Ocilla failed to address any specific outstanding violations; however, they requested the Commission "stay any monetary penalties for a period of 18 months to allow the transition and corrections to have time to take effect".

THIRD FOLLOW-UP INSPECTION: During this inspection (JJ23-023) Staff could not verify that the Operator requested the records from previous employers for their new covered employees as required under §40.25.

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

6. In regard to the probable violation of §40.333(a)(2), which was cited under Inspection Number JS19-034; in that inspection Staff stated: "The City of Ocilla failed to obtain and maintain previous employer records regarding alcohol test results of employees." (Ref, PHMSA Inspection Question L.01.a / alcohol records)
7.

OPERATOR RESPONSE: Staff found no response letter from the City of Ocilla for Inspection Number JS19-034.

FIRST FOLLOW-UP INSPECTION: On March 16, 2020, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Insp # JJ20-015) In that inspection Staff stated: "During this inspection (JJ20-015) Staff found that the Operator has not responded to the above Probable Violation stated in JS19-034. Subsequent to this inspection Staff verified that a copy of this report was emailed to the Operator, and a hard copy was sent out on 1/27/2020."

OPERATOR RESPONSE: OPERATOR RESPONSE: Staff found no response letter from the City of Ocilla for Inspection Number JS19-034.

SECOND FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's previously existing Probable Violations. (Ref. Insp # JJ22-017) In that inspection Staff stated: "During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers JS19-034 or JJ20-015 or taken any actions to address the probable violations or associated civil penalties in those reports."

OPERATORS FIRST RESPONSE: On August 2, 2022, the Commission received a response to Inspection Numbers JJ22-017 and JJ22-015 which was dated July 19, 2022. In their response letter the City of Ocilla failed to address any specific outstanding violations; however, they requested the Commission "stay any monetary penalties for a period of 18 months to allow the transition and corrections to have time to take effect".

THIRD FOLLOW-UP INSPECTION: During this inspection (JJ23-023) Staff could not verify that the Operator requested the records from previous employers for their new covered employees as required under §40.25.

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

8. In regard to the probable violation of 49CFR, §199.105(c)(6) which was cited in Inspection Number JS19-034; in that inspection Staff stated: "The City of Ocilla failed to conduct random drug testing of their covered employee during CY2018 or the first two (2) quarters of 2019."

   Staff proposed a civil penalty of $2,500.00 for this probable violation.

   OPERATOR RESPONSE: Staff found no response letter from the City of Ocilla for Inspection Number JS19-034.

   FIRST FOLLOW-UP INSPECTION: On March 16, 2020, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Insp # JJ20-015) In that inspection Staff stated: "During this inspection (JJ20-015) Staff found that the Operator has not responded to the above Probable Violation stated in JS19-034. Subsequent to this inspection Staff verified that a copy of this report was emailed to the Operator, and a hard copy was sent out on 1/27/2020."

   OPERATOR RESPONSE: Staff found no response letter from the City of Ocilla for Inspection Number inspection JJ20-015.

   SECOND FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's previously existing Probable Violations. (Ref. Insp # JJ22-017) In that inspection Staff stated: "During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers JS19-034 or JJ20-015 or taken any actions to address the probable violations or associated civil penalties in those reports."

   OPERATORS FIRST RESPONSE: On August 2, 2022, the Commission received a response to Inspection Numbers JJ22-017 and JJ22-015 which was dated July 19, 2022. In their response letter the City of Ocilla failed to address any specific outstanding violations; however, they requested the Commission "stay any monetary penalties for a period of 18 months to allow the transition and corrections to have time to take effect".

   THIRD FOLLOW-UP INSPECTION: During this inspection (JJ23-023) Staff found that during CY2021 the City of Ocilla did not send anyone for drug testing due to the Covid-19 pandemic. They did provide documentation which indicated they had performed testing for CY's 2022 and 2023.

   While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation or the proposed penalty, therefore Staff determined that this violation could not be cleared at this time.

9. In regard to the probable violation of 49CFR, §199.115(a) which was cited under Inspection Number JS19-034; in that inspection Staff stated: "The City of Ocilla could not demonstrate that they had verified that their contractor's drug & alcohol program are in compliance with the requirements of 49CFR, Parts 40 and 199."

OPERATOR RESPONSE: Staff found no response letter from the City of Ocilla for Inspection Number JS19-034.

FIRST FOLLOW-UP INSPECTION: On March 16, 2020, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Insp # JJ20-015) In that inspection Staff stated: "During this inspection (JJ20-015) Staff found that the Operator has not responded to the above Probable Violation stated in JS19-034. Subsequent to this inspection Staff verified that a copy of this report was emailed to the Operator, and a hard copy was sent out on 1/27/2020."

OPERATOR RESPONSE: Staff found no response letter from the City of Ocilla for Inspection Number inspection JJ20-015.

SECOND FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's previously existing Probable Violations. (Ref. Insp # JJ22-017) In that inspection Staff stated: "During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers JS19-034 or JJ20-015 or taken any actions to address the probable violations or associated civil penalties in those reports."

OPERATORS FIRST RESPONSE: On August 2, 2022, the Commission received a response to Inspection Numbers JJ22-017 and JJ22-015 which was dated July 19, 2022. In their response letter the City of Ocilla failed to address any specific outstanding violations; however, they requested the Commission "stay any monetary penalties for a period of 18 months to allow the transition and corrections to have time to take effect".

THIRD FOLLOW-UP INSPECTION: During this inspection (JJ23-023) the City of Ocilla provided documentation that they had verified that their contractor's drug & alcohol program has been reviewed

While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation, therefore Staff determined that this violation could not be cleared at this time.

10. In regard to the probable violation of §199.113(c) which was sited under Inspection Number JS19-034 in that inspection Staff Stated: "The City of Ocilla failed to maintain records which demonstrate that their supervisors have been trained as required by §199.113(c)."

OPERATOR RESPONSE: Staff found no response letter from the City of Ocilla for Inspection Number JS19-034.

FIRST FOLLOW-UP INSPECTION: On March 16, 2020, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Insp # JJ20-015) In that inspection Staff stated: "During this inspection (JJ20-015) Staff found that the Operator has not responded to the above Probable Violation stated in JS19-034. Subsequent to this inspection Staff verified that a copy of this report was emailed to the Operator, and a hard copy was sent out on 1/27/2020."

OPERATOR RESPONSE: Staff found no response letter from the City of Ocilla for Inspection Number inspection JJ20-015.

SECOND FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's previously existing Probable Violations. (Ref. Insp # JJ22-017) In that inspection Staff stated: "During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers JS19-034 or JJ20-015 or taken any actions to address the probable violations or associated civil penalties in those reports."

OPERATORS FIRST RESPONSE: On August 2, 2022, the Commission received a response to Inspection Numbers JJ22-017 and JJ22-015 which was dated July 19, 2022. In their response letter the City of Ocilla failed to address any specific outstanding violations; however, they requested the Commission "stay any monetary penalties for a period of 18 months to allow the transition and corrections to have time to take effect".

THIRD FOLLOW-UP INSPECTION: During this inspection (JJ23-023) Staff determined that the City of Ocilla has records which demonstrate that their supervisors have been trained as required by §199.117(a)(4).

While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation, therefore Staff determined that this violation could not be cleared at this time.

11. In regard to the Notice of Amendment of §40.11(b) which was sited under Inspection Number JS19-034; in that inspection Staff Stated: "The City of Ocilla's drug & alcohol plan failed to address how they will ensure the laboratory they utilize retains all necessary records pertaining to each employee tested according to federal regulations."

    OPERATOR RESPONSE: Staff found no response letter from the City of Ocilla for Inspection Number JS19-034.

    FIRST FOLLOW-UP INSPECTION: On March 16, 2020, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Insp # JJ20-015) In that inspection Staff stated: "During this inspection (JJ20-015) Staff found that the Operator has not responded to the above Probable Violation stated in JS19-034. Subsequent to this inspection Staff verified that a copy of this report was emailed to the Operator, and a hard copy was sent out on 1/27/2020."

    OPERATOR RESPONSE: Staff found no response letter from the City of Ocilla for Inspection Number inspection JJ20-015.

    SECOND FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's previously existing Probable Violations. (Ref. Insp # JJ22-017) In that inspection Staff stated: "During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers JS19-034 or JJ20-015 or taken any actions to address the probable violations or associated civil penalties in those reports."

    OPERATORS FIRST RESPONSE: On August 2, 2022, the Commission received a response to Inspection Numbers JJ22-017 and JJ22-015 which was dated July 19, 2022. In their response letter the City of Ocilla failed to address any specific outstanding violations; however, they requested the Commission "stay any monetary penalties for a period of 18 months to allow the transition and corrections to have time to take effect".

THIRD FOLLOWUP INSPECTION: During this inspection (JJ23-023), Staff reviewed The City of Ocilla's Drug and Alcohol Manual and determined that they will ensure the laboratory they utilize retains all necessary records pertaining to each employee tested according to federal regulations, according to §40.109 and §40.111.

While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation or the proposed penalty, therefore Staff determined that this violation could not be cleared at this time.

12. In regard to the probable violation of 49CFR, §40.15(b) which was cited under Inspection Number JS19-034; in that inspection Staff Stated: "The City of Ocilla could not demonstrate that their urine collectors and Substance Abuse Professional meet with the qualification requirements under Part 40."

    OPERATOR RESPONSE: Staff found no response letter from the City of Ocilla for Inspection Number JS19-034.

    FIRST FOLLOW-UP INSPECTION: On March 16, 2020, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Insp # JJ20-015) In that inspection Staff stated: "During this inspection (JJ20-015) Staff found that the Operator has not responded to the above Probable Violation stated in JS19-034. Subsequent to this inspection Staff verified that a copy of this report was emailed to the Operator, and a hard copy was sent out on 1/27/2020."

    OPERATOR RESPONSE: Staff found no response letter from the City of Ocilla for Inspection Number inspection JJ20-015.

    SECOND FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's previously existing Probable Violations. (Ref. Insp # JJ22-017) In that inspection Staff stated: "During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers JS19-034 or JJ20-015 or taken any actions to address the probable violations or associated civil penalties in those reports."

    OPERATORS FIRST RESPONSE: On August 2, 2022, the Commission received a response to Inspection Numbers JJ22-017 and JJ22-015 which was dated July 19, 2022. In their response letter the City of Ocilla failed to address any specific outstanding violations; however, they requested the Commission "stay any monetary penalties for a period of 18 months to allow the transition and corrections to have time to take effect".

    THIRD FOLLOW-UP INSPECTION: During this inspection (JJ23-023) Staff could not verify that the Operators urine collectors or SAP's meet the qualification requirements under Part 40.

    While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation, therefore Staff determined that this violation could not be cleared at this time.

13. In regard to the Probable Violation of 49CFR §192.605(a) which was cited in Inspection Number (JJ20-016); in that inspection Staff stated:" That the City of Ocilla failed to ensure that

their gas detection device was calibrated and maintained in accordance with their operations and maintenance procedures".

Staff proposed a civil penalty of $2,500.00 for this probable violation.

OPERATOR RESPONSE: Staff found no response letter from the City of Ocilla for Inspection Number inspection JJ20-016.

FIRST FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's previously existing Probable Violations. (Ref. Insp # JJ22-017) In that inspection Staff stated: "During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers JS19-034 or JJ20-015 or taken any actions to address the probable violations or associated civil penalties in those reports."

OPERATORS FIRST RESPONSE: On July 27, 2023, the Commission received a response to Inspection Numbers JJ22-016, JJ22-017, JJ22-015 which was dated February 22, 2023. In their response letter the City of Ocilla failed to address any specific outstanding violations and requested a six-month extension to assess their situation.

SECOND FOLLOW-UP INSPECTION: During this inspection (JJ23-023) Staff determined that The City of Ocilla was able to show a Certificate of Calibration for their gas detection equipment.

While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation or the proposed civil penalty, therefore Staff determined that this violation could not be cleared at this time.

14. In regard to the probable violation of Commission Rule 515-9-3-.08 which was cited in Inspection Number JJ20-015; in that inspection Staff stated: "The City of Ocilla failed to provide a written response to Inspection Numbers AT19-022 and JS19-034 as required by Commission Rule 515-9-3-.08."

    Staff proposed a civil penalty of $2,500.00 for this violation.

    OPERATOR FIRST RESPONSE: The City of Ocilla failed to provide a response to Inspection Number JJ20-015.

    FIRST FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. During this inspection (JJ22-017) Staff found that:

    Inspection Number AT19-022, which included a proposed civil penalty of $2,500.00, was emailed to the Operator on December 9, 2019, and a hard copy was sent out by certified mail on December 10, 2019. The City of Ocilla failed to provide a response to Inspection Number JJ22-017.

    Inspection Number JS19-034, which included a proposed civil penalty of $2,500.00, was emailed to the Operator on January 7, 2020, and a hard copy was sent out by certified mail on the same day. The City of Ocilla failed to provide a response to Inspection Number Js19-034.

Inspection Number JJ20-015, which included a proposed civil penalty of $2,500.00 for the Operators failure to respond to Inspection Numbers AT19-022 and JS19-034, was e-mailed to the Operator on June 12, 2020, and a hard copy was sent out by certified mail on June 25, 2020. The City of Ocilla failed to provide a response to Inspection Number JJ20-015.

Inspection Number JJ20-016, which included a proposed civil penalty of $2,500.00, was emailed to the Operator on June 25, 2020, and a hard copy was sent out by certified mail on the same day. The City of Ocilla failed to provide a response to Inspection Number JJ20-016.

Staff determined that the City of Ocilla has not responded to Inspection Numbers AT19-022, JS19-034, JJ20-015 or JJ20-016 and has taken no actions to address the outstanding violations or the $10,000.00 in proposed civil penalties associated with those probable violations.

OPERATORS SECOND RESPONSE: On August 2, 2022, the City of Ocilla responded to Inspection Number JJ22-017, however they failed to address any specific violations in their response.

OPERATORS THIRD RESPONSE: On July 27, 2023, the Commission received a response to Inspection Numbers JJ22-016, JJ22-017, JJ22-015 which was dated February 22, 2023. In their response letter the City of Ocilla failed to address any specific outstanding violations and requested a six-month extension to assess their situation.

SECOND FOLLOWUP INSPECTION: During this inspection (JJ23-023) Staff met with the City Manager and the Public Works Superintendent. They indicated that the City of Ocilla wanted an informal conference to discuss their outstanding civil penalties, however they have not requested one.

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

15. In regard to the Probable Violation of 49CFR, §192.603(c) which was cited in Inspection Number JJ22-015; in that inspection Staff stated: "Pursuant to section 60108(a)(2) and §192.603(c), Staff has determined that the City of Ocilla has failed to update their inspection and maintenance plans to address eliminating hazardous leaks and minimizing releases of natural gas (including intentional venting during normal operations) from their pipeline facilities."

OPERATORS FIRST RESPONSE: On July 27, 2023, the Commission received a response to Inspection Numbers JJ22-016, JJ22-017, JJ22-015 which was dated February 22, 2023. In their response letter the City of Ocilla failed to address any specific outstanding violations and requested a six-month extension to assess their situation.

FIRST FOLLOW-UP INSPECTION: During this inspection (JJ23-023) Staff determined that The City of Ocilla has failed to update their inspection and maintenance plans to address eliminating hazardous leaks and minimizing releases of natural gas (including intentional venting during normal operations) from their pipeline facilities.

While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation or the proposed penalty, therefore Staff determined that this violation could not be cleared at this time.

16. In regard to the Probable Violation of 49CFR, §192.613(a) which was cited in Inspection Number JJ22-016; in that inspection Staff stated: "The City of Ocilla failed to ensure that all segments of pipeline found to be in an unsatisfactory condition were repaired or replaced as soon as practical, as required by their Operations and Maintenance Procedures."

    Staff proposed a civil penalty of $2,500.00 for this probable violation.

    OPERATORS FIRST RESPONSE: On July 27, 2023, the Commission received a response to Inspection Numbers JJ22-016, JJ22-017, JJ22-015 which was dated February 22, 2023. In their response letter the City of Ocilla failed to address any specific outstanding violations and requested a six-month extension to assess their situation.

    FIRST FOLLOWUP INSPECTION: During this inspection (JJ23-023) Staff reviewed the Operators work order and confirmed that the pipeline had been removed from the driveway of the Ocilla Pharmacy parking lot.

    While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation or the proposed penalty, therefore Staff determined that this violation could not be cleared at this time.

17. In regard to the Probable Violation of 49CFR, §192.703(c) which was cited in Inspection Number JJ22-016; in that inspection Staff stated: "The City of Ocilla failed to ensure that a hazardous leak was repaired promptly as required by §192.703(c) and their O&M Procedures."

    Staff proposed a civil penalty of $2,500.00 for this probable violation.

    OPERATORS FIRST RESPONSE: On July 27, 2023, the Commission received a response to Inspection Numbers JJ22-016, JJ22-017, JJ22-015 which was dated February 22, 2023. In their response letter the City of Ocilla failed to address any specific outstanding violations and requested a six-month extension to assess their situation.

    FIRST FOLLOWUP INSPECTION: During this inspection (JJ23-023), Staff reviewed The City of Ocilla's work orders and photographs to determined that remedial measures have been taken to correct the leaks.

    While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation or the proposed penalty, therefore Staff determined that this violation could not be cleared at this time.

18. In regard to the Probable Violation of 49CFR, §192.199(h) which was cited in Inspection Number JJ22-016; in that inspection Staff stated: "The Operator failed to provide for the prevention of unauthorized operation of any stop valve that will make the pressure relief valve or pressure limiting device inoperative at its regulator and relief station."

Staff proposed a civil penalty of $2,500.00 for this probable violation.

OPERATORS FIRST RESPONSE: On July 27, 2023, the Commission received a response to Inspection Numbers JJ22-016, JJ22-017, JJ22-015 which was dated February 22, 2023. In their response letter the City of Ocilla failed to address any specific outstanding violations and requested a six-month extension to assess their situation.

FIRST FOLLOWUP INSPECTION: During this inspection (JJ23-023), Staff reviewed The City of Ocilla work orders and determined that they have mitigated the issues by adding a lock so that it will be inoperative to anyone who is not authorized to operate the valve.

While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation or the proposed penalty, therefore Staff determined that this violation could not be cleared at this time.

19. In regard to the Probable Violation of 49CFR, §192.481(c) which was cited in Inspection Number JJ22-016; in that inspection Staff stated: "The City of Ocilla failed to remediate atmospheric corrosion which was identified on their system as required by §192.481(c) and their Operations and Maintenance Procedures Manual."

    Staff proposed a civil penalty of $2,500.00 for this probable violation.

    OPERATORS FIRST RESPONSE: On July 27, 2023 the Commission received a response to Inspection Numbers JJ22-016, JJ22-017, JJ22-015 which was dated February 22, 2023. In their response letter the City of Ocilla failed to address any specific outstanding violations and requested a six-month extension to assess their situation.

    FIRST FOLLOWUP INSPECTION: During this inspection (JJ23-023), Staff verified that the Operator has remediated the atmospheric conditions on 129 N regulator station. The work on the Station has been completed.

    While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation or the proposed penalty, therefore Staff determined that this violation could not be cleared at this time.

20. In regard to the Notice of Amendment for 49CFR, §192.455(e) which was cited in Inspection Number (JJ22-016); in that inspection Staff stated: "The Operators 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 Operators procedures indicates that they do not have buried or submerged amphoteric metal, however, Staff found no indication that the Operator prevents the installation of aluminum in their system."

    OPERATORS FIRST RESPONSE: On July 27, 2023 the Commission received a response to Inspection Numbers JJ22-016, JJ22-017, JJ22-015 which was dated February 22, 2023. In their response letter the City of Ocilla failed to address any specific outstanding violations and requested a six-month extension to assess their situation.

FIRST FOLLOWUP INSPECTION: During this inspection (JJ23-023), Staff reviewed The City of Ocilla O&M Procedures for buried or submerged pipelines installed after July 31, 1971, has been included in their O&M Procedure manual.

While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation, therefore Staff determined that this violation could not be cleared at this time.

21. In regard to the Probable Violation of 49CFR, §192.605(b)(2) / §192.479 which was cited in Inspection Number (JJ22-016); in that inspection Staff stated: "The City of Ocilla failed to follow their procedures to properly apply protective wrap to exposed piping."

    OPERATORS FIRST RESPONSE: On July 27, 2023 the Commission received a response to Inspection Numbers JJ22-016, JJ22-017, JJ22-015 which was dated February 22, 2023. In their response letter the City of Ocilla failed to address any specific outstanding violations and requested a six-month extension to assess their situation.

    FIRST FOLLOWUP INSPECTION: During this inspection (JJ23-023), Staff reviewed the operators work order and found that the LaSalle Detention Center 4" pipe that feeds the meter set has been cleaned and rewrapped so that water could not infiltrate the wraps and migrate under the wrap to the riser.

    While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation, therefore Staff determined that this violation could not be cleared at this time.

22. In regard to the Probable Violation of 49CFR, §192.723(b) which was cited in Inspection Number JJ22-016; in that inspection "Staff identified: multiple locations inside business district that have not been surveyed within the one-year timeframes. For example, 1- Irwin Manufacturing (business district) – not surveyed November 2019, surveyed in October 2020, and not surveyed on November 2021. Still not surveyed as of this inspection March 2022.

    Staff proposed a civil penalty of $2,500.00 for this probable violation.

    OPERATORS FIRST RESPONSE: On July 27, 2023, the Commission received a response to Inspection Numbers JJ22-016, JJ22-017, JJ22-015 which was dated February 22, 2023. In their response letter the City of Ocilla failed to address any specific outstanding violations and requested a six-month extension to assess their situation.

    FIRST FOLLOW UP INSPECTION: During this inspection (JJ23-023) Operator stated that they will be doing a complete leak system survey by October 31, 2023.

    Staff determined that this violation cannot be cleared at this time.

23. In regard to the Probable Violation of 49CFR, §192.147(a) which was cited in Inspection Number JJ22-016; in that inspection Staff stated: The City of Ocilla Natural Gas System failed to ensure that each of their flanges or flange accessories meet the minimum requirements of ASME/ANSI B 16.5 and MSS SP-44 as required by §192.147(a).

OPERATORS FIRST RESPONSE: On July 27, 2023 the Commission received a response to Inspection Numbers JJ22-016, JJ22-017, JJ22-015 which was dated February 22, 2023. In their response letter the City of Ocilla failed to address any specific outstanding violations and requested a six-month extension to assess their situation.

FIRST FOLLOWUP INSPECTION: During this inspection (JJ23-023), Staff inspected the regulator station and the work order's and confirmed that the operator has replaced the bolts on the station to meet code standards.

While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation, therefore 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.

OPERATOR RESPONSE FORM

Operator Name: City of Ocilla

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37074

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	$_____ Proposed Penalty for this violation
☐ Notice of Amendment (NOA)	☐ Yes ☐ No	
☐ 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:	)	
	)	
Continuing Violation Report	)	**DOCKET NO. 37074**
City of Ocilla Gas Department	)	
Inspection JJ23-023 on June 22, 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 Ocilla 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 Melvin D. Harper II, Mayor
City of Ocilla Gas Department
P.O. Box 626
113 North Erwin St
Ocilla, GA 31774
mayor@cityofocillaga.net

*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

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