COMMISSIONERS

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

FILED
MAR 01 2024
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. 37035

DOCKET # 37035
DOCUMENT # 217792

City of Claxton Gas Department
P. O. Box 829
204 West Railroad Street
Claxton, GA 30417

REF: Follow Up Inspection # JH23-008

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Terry Branch

On February 19, 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 JH23-008 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. 37035 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

COMMISSIONERS

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

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: JH23-008

OPERATOR: City of Claxton Gas Department

INVESTIGATOR: Jack Hewitt

INSPECTION DATE: February 19, 2023 REPORT MAILED DATE: February 28, 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
192.1007(d)	Identify and implement measures to address risks.	AT22-009	2/21/2022
192.1011	What records must an operator keep?	AT22-009	2/21/2022

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTIOM REPORT

CITY OF CLAXTON / FOLLOW UP INSPECTION
INSPECTION NUMBER JH23-008/ DOCKET NUMBER 37035

On June 12, 2023, Staff reported to the City of Claxton to conduct a follow-up inspection of the Operators previously existing probable violations.

During this inspection the Operator was represented by:
Brad Jernigan – Gas Superintendent
Bishop Bullard- Service Technician
Taylor Rush- Regulatory Compliance Manager
Chris Cawley – MGAG/SRCS (Consultant)

Commission Staff was represented by:
Jack Hewitt – Lead Inspector
Alan Towe – Pipeline Safety Inspector
David Lewis- Pipeline Safety Inspector

At the time of this inspection the City of Claxton was under two (2) previously existing probable violations.

Staff reviewed the probable violation with the Operator and determined that:

PROBABLE VIOLATIONS CONTINUING

1. In regard to the probable violation of 49 CFR §192.1007 which was cited in Inspection Number AT22-009 in that inspection Staff stated: "A review of the Operators 2017 DIMP plan indicated 3rd party damage as number 1 risk and the risk generated thru SHRIMP was rated as a low risk with no actions recommended to be taken to reduce. Operator has only had one 3rd party damage in last 10 years. In 2019 the Operator plan listed External Corrosion as number 1 risk and the risk generated thru SHRIMP was rated as a low risk with no actions recommended to be taken to reduce. Operator has reported 20 external corrosion leaks in last 10 years. The operator erroneously determined that no actions were necessary, when risk reduction measures should have been taken. The Operator stated during this inspection they are beginning the process in revising their plan this year to include measures to reduce their top 2 risks which are #1-External Corrosion and #2 Excavator damage."

   OPERATOR RESPONSE: In their response letter to Inspection Number AT22-009 dated June 7, 2022 City of Claxton stated that: "The City of Claxton ("Claxton") has determined that most of the 20 leaks referenced in this Report were not caused by corrosion but instead were caused by the failure of a type of Dresser coupling that was used on steel service lines with a certain type coating. The remedial measure in these cases has been replacement of the service line. Claxton has determined there are approximately 200 service lines in a limited area of its system with this type fitting. These fittings will be added to Claxton's DIMP as a threat and the associated risk will be evaluated. To address this threat, Claxton will replace at least twenty of these service lines annually and will perform an annual leakage survey of the affected area."

FOLLOW-UP INSPECTION: During this inspection (JH23-008) Staff examined twenty service orders dating from January 2022 to February 2022 that the City of Claxton either repaired or replaced these service lines. Staff also examined the leak survey from January – February 2022. The City of Claxton is on track for the service line repair but will not conduct their reevaluation plan for the DIMP Implementation until July 2023.

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

2. In regard to the probable violation of 49 CFR §192.1011 which was cited in Inspection Number AT22-009 in that inspection Staff stated: "During this inspection the Operator was unable to provide Staff with patrolling records beyond calendar year 2018 that are an essential part of documentation needed when identifying information needed for compliance with Part 192.1007.

   OPERATOR RESPONSE: In their response letter to Inspection Number AT22-009 dated June 7, 2022 City of Claxton stated that: "Claxton has located documentation of patrolling performed in 2019 and 2020. These records are available for Staff's review."

   FOLLOW-UP INSPECTION: During this inspection (JH23-008) Staff examined documentation of the 2019- 2022 patrolling records for Bellville, Hagan, Claxton, Pembroke, and Ellabell. Staff identified that in 2022, The City of Claxton did not complete their fourth quarter patrolling nor have they completed any patrolling at the time of this follow up inspection for the year 2023.

   Staff determined that this probable violation cannot 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:	)	
	)	
Continuing Violation Report	)	**DOCKET NO. 37035**
City of Claxton Gas Department	)	
Inspection JH23-008 on February 19, 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 Claxton 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 Terry Branch, Mayor
City of Claxton Gas Department
P.O. Box 829
204 West Railroad Street
Claxton, GA 30417
mayor@cityofclaxton.net

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

Respectfully Submitted this 5th day of March 2024:

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