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Georgia Public Service Commission

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244 Washington Street, SW
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psc.ga.gov

DOCKET# 37079
DOCUMENT# 218044

Docket No. 37079

City of Royston Gas Department
684 Franklin Springs Street
Royston, GA 30662

REF: Follow Up Inspection # JS23-027

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Edward Andrews

On September 26, 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 JS23-027 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. 37079 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: JS23-027

OPERATOR: City of Royston Gas Department

INVESTIGATOR: Jason Smith

INSPECTION DATE: September 26, 2023 REPORT MAILED DATE: March 19, 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 Operator's previously existing probable violations.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.465(d)	Each operator shall take prompt remedial action to correct any deficiencies indicated by the...	DJ20-036	11/9/2020
192.479(a)	Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the...	DJ20-036	11/9/2020

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

CITY OF ROYSTON GAS DEPARTMENT / FOLLOW-UP INSPECTION
INSPECTION NUMBER JS23-027 / DOCKET NUMBER 37079

On September 28, 2023, Pipeline Safety Staff reported to the City of Royston to perform a follow-up inspection on the Gas Department's previously existing probable violations.

During this inspection, the Operator was represented by:
Travis Quarles – Gas Superintendent
Lori Lamberth – MGAG/SRCS (Consultant)

Pipeline Safety Staff was represented by:
Jason Smith – Lead Inspector
Brant Sweat – Pipeline Safety Inspector

At the time of this inspection the city of Royston Gas Department was under two (2) previously existing probable violations. Staff reviewed these probable violations with the Operator and determined that:

PROBABLE VIOLATION CONTINUING

1. In regard to the Probable Violation of 49CFR, §192.465(d) which was cited in Inspection Number DJ20-036; in that inspection Staff stated: "Operator failed to take remedial action on discrepancies found during monitoring of their cathodic protection system."

   OPERATORS FIRST RESPONSE: In their response letter to Inspection Number DJ20-036, dated February 19, 2021, the Operator stated: "The City of Royston exposed the service tap for 53 Taylor St with the intention of inserting the service. The service tap was connected to the steel main with a three-way threaded steel tee and bushings with the steel service connected with a steel dresser coupling. Additionally, a small grade III leak was discovered at the service tap on one threaded joint. With no safe way to stop the flow of gas without shutting down the entire main, the City of Royston determined the best course of action to be a main and service replacement of this area. Approx. 2.5 miles of main and 67 services have been identified in this replacement project to be completed in two phases. Expected completion time is 12 months for the entire project. The City of Royston is also in the process of re-evaluating it DIM Plan to include this newly identified threat into its DIM Program."

   REVIEW OF OPERATOR RESPONSE: On April 15, 2021, Staff reviewed the Operator's February 19, 2021 response for Inspection Number DJ20-036 and found that the response did not address the violation. (Ref. Inspection Number DJ21-013) In that review Staff stated: "The Operator needs to explain how they will take prompt remedial action on discrepancies found during monitoring of their cathodic protection system; therefore, the information is not sufficient at this time to address this violation."

   FIRST FOLLOW-UP INSPECTION: During this inspection (Inspection Number JS23-027) the Operator informed Staff that the replacement of 2.5 miles of main and 67 services had not been totally completed. To specifically address the probable violation found at 53 Taylor Street the Operator had an 8-foot section of main replaced with 1 ½ inch main, coated with Roskote and tape. A new tap was installed, and a ¾-inch plastic service was run to 53 Spring Street.

   Staff also reviewed Royston's CP surveys for 2021 and 2022, looking for any indications of inadequate cathodic protection. Staff found in the September 29, 2021, CP survey for the Grove Street (aka Yellow) system, a pipe-to-soil reading of -0.538 at the 101 Timberlake Circle meter. Approximately 7 months later during the April 20, 2022, CP survey 101 Timberlake Circle had both 'On' and 'Off' pipe-to-soil readings of -0.560. On September 13, 2022, Royston Gas Department noted a section of pipe located near 292 Dovetown Road, which they believed could be the cause of

inadequate cathodic protection in their Grove Street (aka Yellow) system. Royston Gas replaced a 7-feet section of 2-inch main. The Operator performed a subsequent check of the CP at 101 Timberlake Circle and found it reading -1.580.

Staff determined that the Operator had taken action to correct the deficiency which existed at 53 Taylor Street from 2013 to 2022, however they have not stated how they will ensure remedial action on discrepancies found during cathodic protection monitoring will be addressed in the future.

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

2. In regard to the Probable Violation of 49CFR, §192.479(a) which was in Inspection Number DJ20-036; in that inspection Staff stated: "The Operator failed to clean and coat the pipeline attached to the bridge at North Fork Broad River as required under 192.479(a)."

   OPERATORS FIRST RESPONSE: In their response letter to Inspection Number DJ20-036, dated February 19, 2021, the Operator stated: "The City of Royston will correct this deficiency within 6 months from the date of this response."

   REVIEW OF OPERATOR RESPONSE: On April 15, 2021, Staff reviewed the Operator's February 19, 2021 response for Inspection Number DJ20-036 found that remedial work, cleaning, and coating the pipeline attached to the bridge at North Fork Broad River will not be completed until September 2021; therefore, the information is not sufficient at this time to address this violation.

   FIRST FOLLOW-UP INSPECTION: During this inspection (Inspection Number JS23-027) the Operator informed Staff that the decision was made to have the pipeline removed from the bridge, and bored-in instead. They began the process but ran into a problem. During the pull-back process the drill head was lost. The bore will have to be re-done, but the materials needed for the second attempt had to be ordered so they're waiting to receive what they need. Once the bore is completed and the existing pipeline on the bridge is taken out of service; the §192.479(a) probable violation can be revisited.

   Staff determined that this probable 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 Royston

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37079

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
☐ Notice of Amendment (NOA)	☐ Yes ☐ No
☐ Warning Letter	☐ Yes ☐ No
☐ Letter of Concern	☐ Yes ☐ No
☐ Observed Issue	☐ Yes ☐ No
☐ Proposed Civil Penalty	☐ Yes ☐ No

$_____
Proposed Penalty for this violation

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. 37079**
City of Royston Gas Department	)	
Inspection JS23-027 on September 26, 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 Royston 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

*Mr. Edward Andrews, City Manager
City of Royston Gas Department
684 Franklin Springs Street
Royston, GA 30662
citymanager@cityofroyston.com

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

Respectfully Submitted this 24th day of March 2023:

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