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Georgia Public Service Commission

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Atlanta, GA 30334-5701

FAX: (404) 463-6532
psc.ga.gov

Docket No. 37055

DOCKET# 37055
DOCUMENT# 218046

City of Grantville Gas System
123 LaGrange Street P. O. Box 160
Grantville, GA 30220

REF: Follow Up Inspection # JS23-024

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Al Grieshaber

On August 28, 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 JS23-024 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. 37055 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: JS23-024

OPERATOR: City of Grantville Gas System

INVESTIGATOR: Jason Smith

INSPECTION DATE: August 28, 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
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	AT22-006	2/3/2022
192.615(a)(4)	The availability of personnel, equipment, tools, and materials, as needed at the scene of an...	AT22-006	2/3/2022

3. CLEARED VIOLATIONS

Cleared on 8/28/2023

Violation	Description	Inspection#	Date
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	JL18-002	1/30/2018
192.615(b)(3)	Review employee activities to determine whether the procedures were effectively followed in each...	AT22-006	2/3/2022
192.605(b)(3)	Maintenance and normal operations. The manual required by paragraph (a) of this section must...	AT22-006	2/3/2022
192.615(a)(6)	Emergency shutdown and pressure reduction in any section of the operator's pipeline system neces...	AT22-006	2/3/2022
192.807(b)	Records supporting an individual's current qualification shall be maintained while the individual...	AT22-006	2/3/2022

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
Under Consent Agreement	Operator is under a Consent Agreement.	JS23-024	8/28/2023

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

On August 28, 2023, Pipeline Safety Staff reported the City of Grantville Gas System and performed a follow-up inspection on the Operator's previously existing probable violations that were cited under comprehensive inspection #AT22-006.

During this inspection the Operator was represented by:
Alex Boyd - Gas System Supervisor
Joan Henry - Utility Coordinator
Gene Taylor - MGAG/SRCS (consultant)

Commission Staff was represented by:
Jason Smith - Lead Inspector
Brant Sweat - Pipeline Safety Inspector
Daniel Clemmons - Pipeline Safety Inspector
Alan Towe - Pipeline Safety Inspector

At the time of this inspection the City of Grantville Gas System was under six (6) previously existing probable violations and one Consent Agreement. The Consent Agreement is addressed under Inspection Number DC23-037. Staff reviewed these probable violations with the Operator and determined that:

PROBABLE VIOLATION CLEARED

1. In regard to the probable violation of §192.807(b) which was cited under Inspection Number AT22-006; in that inspection Staff stated: The City of Grantville failed to maintain qualification records demonstrating compliance with §192.807(b).

   OPERATOR RESPONSE: In their response letter to Inspection Number AT22-006, dated July 28, 2022, the City of Grantville stated: "Grantville has reviewed and accepted all applicable Operator Qualification for the City of LaGrange and has documented this review. Records are available for Staff's review."

   FOLLOW-UP INSPECTION: On August 28, 2023, Staff reported to the City of Grantville and followed up with the Operator on their existing probable violations. In regard to §192.807(b) the Operator demonstrated to Staff that they have access to qualification records of their contractor's personnel (ex. LaGrange Gas Department and Harp & Associates). Staff finds Grantville Gas System has adequately addressed this violation.

   Staff determined that this violation could be cleared at this time.

2. In regard to the probable violation of §192.615(b)(3) which was cited under Inspection Number AT22-006; in that inspection Staff stated: "The City of Grantville failed to perform the requirements of Part 192.615(b)(3) and their emergency procedures"

   OPERATOR RESPONSE: In their response letter to Inspection Number AT22-006, dated July 28, 2022, the City of Grantville stated: "Grantville is confident the referenced repair

was documented; however, the work order documenting this repair could not be located. Grantville will ensure that documentation of future repairs such as this is properly preserved, and the employees' actions are reviewed."

FOLLOW-UP INSPECTION: On August 28, 2023, Staff reported to the City of Grantville and followed up with the Operator on their existing probable violations. In regard to §192.615(b)(3) the Operator showed Staff records of a damage that occurred in August 2023 and the City of LaGrange Gas Department came in to do the repair work for Grantville. Grantville Gas System Supervisor was on site when the repair work was performed. LaGrange Gas Department completed a work order that was signed off by their construction supervisor, was submitted to the City of Grantville Gas System and reviewed. Staff finds Grantville Gas System has adequately addressed this violation.

Staff determined that this violation could be cleared at this time.

3. In regard to the probable violation of §192.615(a)(6) which was cited under Inspection Number AT22-006; in that inspection Staff stated: The City of Grantville has not planned and developed a shutdown process for any section of their system as needed in the event of an emergency.

   OPERATOR RESPONSE: In their response letter to Inspection Number AT22-006, dated July 28, 2022, the City of Grantville stated: "By January 31, 2023, the City of Grantville ("Grantville") will prepare a system map(s) in sufficient detail to determine which valves could be used to isolate designated portions of its system. Grantville will also ensure that all critical valves are identified and listed."

   FOLLOW-UP INSPECTION: On August 28, 2023, Staff reported to the City of Grantville and followed up with the Operator on their existing probable violations. In regard to §192.615(a)(6) the Operator showed Staff that they have updated their pipeline system map. The map now shows the location of their 8 critical valves and gas department personnel was able to show Staff what section of the distribution system each of the valves controlled. The Operator informed Staff that they plan on having a new copy of their updated system map made. Staff finds Grantville Gas System has addressed this violation.

   Staff determined that this violation could be cleared at this time.

4. In regard to the probable violation of §192.605(b)(3) which was cited under Inspection Number AT22-006; in that inspection Staff stated: The City of Grantville has failed to provide adequate maps of their system and make them available to all of their appropriate operating personnel for them to use during their operations, maintenance and emergency response under Part 192.605(b)(3).

   OPERATOR RESPONSE: In their response letter to Inspection Number AT22-006, dated July 28, 2022, the City of Grantville stated: "By January 31, 2023, Grantville will prepare a

system map(s) in sufficient detail to determine which valves could be used to isolate designated portions of its system. Grantville will also ensure that the map is readily available to its on-call and emergency response personnel."

FOLLOW-UP INSPECTION: On August 28, 2023, Staff reported to the City of Grantville and followed up with the Operator on their existing probable violations. In regard to §192.605(b)(3) the Operator showed Staff they have updated their distribution system map to show the location of critical valves. The Gas System Supervisor was able to show Staff what area of the system was controlled by each critical valve. The system map is now no longer kept in his vehicle when he's off duty but left at the Gas System office, so it is accessible to other gas personnel if necessary. Staff finds Grantville Gas System has addressed this violation.

Staff determined that this violation could be cleared at this time.

PROBABLE VIOLATION CONTINUING

As a result of this inspection Staff found that the Operator was in probable violation of the minimum federal safety standards; specifically:

1. In regard to the probable violation of §192.615(a)(4) which was cited under Inspection Number AT22-006; in that inspection Staff stated: "The City of Grantville has failed to establish a process which will ensure the availability of personnel, equipment, tools, and materials, as needed at the scene of an emergency.

   OPERATOR RESPONSE: In their response letter to Inspection Number AT22-006, dated July 28, 2022, the City of Grantville stated: "Grantville has reviewed and revised its process for designating an on-call person and for advising Coweta County 911 of the appropriate persons to contact in case of a natural gas emergency. Grantville also now ensures that its on-call person has ready access to the combustible gas indicator."

   FOLLOW-UP INSPECTION: On August 28, 2023, Staff reported to the City of Grantville and followed up with the Operator on their existing probable violations. The Gas System Supervisor also informed Staff that the combustible gas detector is no longer kept in his vehicle when he's off duty but left at the Gas System office, so it is accessible to other gas personnel if necessary. In regard to §192.615(a)(4) the Operator showed Staff they updated their Plan for Natural Gas Emergencies; appendix C-3 'City of Grantville Emergency Contact List'. Staff determined that the City of Grantville Gas System has not fully addressed this violation.

   Staff observed that the document provided by the Operator no longer requires the reader to start at the top of a list and call the first person "at 5-minute intervals for a maximum of two tries" before moving on to the next person on the list; however, while this document list the employees who can be contacted, it does not specify any actual time frames that any

particular employee is required to be on call. Staff expressed their concern to the Operator that their process for ensuring the availability of personnel under §192.615(a)(4) did not appear to meet the requirements under §192.615(a)(3) to provide a prompt and effective response to a notice of each type of emergency.

2. In regard to the Notice of Amendment §192.605(a) with a deficiency of §192.181(a) which was cited under Inspection Number AT22-006; in that inspection Staff stated: "The City of Grantville must amend their procedures to address the placement of distribution line valves for their system."

   OPERATOR RESPONSE: In their response letter to Inspection Number AT22-006, dated July 28, 2022, the City of Grantville stated: "Grantville is aware that GPSC Staff is preparing a Notice of Proposed Rulemaking that will include requirements related to valve placement. Upon final approval of this Proposed Rule, the new requirements will be incorporated into Grantville's manuals, plans, and procedures, as appropriate."

   FOLLOW-UP INSPECTION: On August 28, 2023, Staff reported to the City of Grantville and followed up with the Operator on their existing probable violations. In regard to §192.181(a) the City of Grantville Gas System provided Staff with section E of their Construction Manual which is titled 'Distribution Line Valves (Ref. §192.181)". This section discusses what to consider when designating the spacing of valves. Staff determined that it does not address the issue brought up during the comprehensive inspection. Currently Section E of their construction manual is merely Guidance Material. The Operator has not developed a specific process on how distribution line valves are placed in their system (Note/Example: Grantville should have a document that considers attributes of their pipeline such as size, operating pressure, location, and number of customers to be affected).

   Staff determined that Notice of Amendment has not been addressed.

3. In regard to the Notice of Amendment §192.605(a) with a deficiency of §192.615(a)(8) which was cited under Inspection Number AT22-006; in that inspection Staff stated: "The City of Grantville must amend their procedures to ensure that they are notifying appropriate fire, police, and other public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency."

   OPERATOR RESPONSE: In their response letter to Inspection Number AT22-006, dated July 28, 2022, the City of Grantville stated: "Grantville is currently evaluating its options for redundant communication methods that could be employed to maintain communications with emergency response personnel in the event its primary communication method(s) fail. Options being considered include access to the Grantville Police Department radio system and dedicated two-way radios. A secondary communication method will be implemented by October 30, 2022."

FOLLOW-UP INSPECTION: On August 28, 2023, Staff reported to the City of Grantville and followed up with the Operator on their existing probable violations. In regard to §192.615(a)(8) the Operator showed Staff that they now have access to police department two-way radios in the event of their primary communication methods fail.

The Operator also provided the following:

Section II 'Establish and Maintaining Communication with Appropriate Public Officials' which states Grantville has identified location(s) to serve as the Emergency Operations Command Center. In establishing the Emergency Operations Command Center Grantville considered the need for the following: Two-Way Radios, if applicable, complete with the applicable codes/frequencies (e.g. Push-to-Talk Radios, etc.).

Appendix C-2 'Government Organization Resources' that list the Grantville Police Department being available for traffic control and their methods of communications include Two-Way Communication (i.e, Central Dispatch)

Appendix D 'Grantville Emergency Operations Command Center Location and Communication Methods' states Emergency Operations Command Centers are equipped /setup with some, or all, of the following: #3. Fixed Radion Communications, and #4. Mobile Radio Communications – Push-to-Talk.

Appendix F-5 'Natural Disasters'

Staff observed that the emergency plan fails to address the two-way radio being an option if land line and cell phone service is not available, and when the Operator will opt to use the two-way radios.

Staff determined that Notice of Amendment has not been addressed.

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 Grantville

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37055

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:	)	
	)	
Cleared and Continuing Violation Report	)	**DOCKET NO. 37055**
City of Grantville Gas System	)	
Inspection JS23-024 on August 28, 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 Grantville Gas System* 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

*Al Grieshaber, City Manager
City of Grantville Gas System
123 LaGrange Street
P.O. Box 160
Grantville, GA 30220
agrieshaber@grantvillega.org

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

Respectfully Submitted this 26th day of March 2024:

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