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Docket No. 37028

DOCKET# 37028
DOCUMENT# 221385

City of Bowman Gas Department
25 Prince Ave
Bowman, GA 30624

REF: Follow Up Inspection # DJ24-037

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Ms. Leah Carey

On September 16, 2024, 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 DJ24-037 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. 37028 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: DJ24-037

OPERATOR: City of Bowman Gas Department

INVESTIGATOR: Daphne Jones

INSPECTION DATE: September 16, 2024 REPORT MAILED DATE: February 5, 2025

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
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	DL19-052	11/18/2019

3. CLEARED VIOLATIONS

Cleared on 9/16/2024

Violation	Description	Inspection#	Date
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	JH21-026	7/28/2021
192.181(a)	Each high-pressure distribution system must have valves spaced so as to reduce the time to...	JH21-026	7/28/2021
192.805(b)	Ensure through evaluation that individuals performing covered tasks are qualified.	JS21-024	9/23/2021

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	DJ24-037	9/16/2024

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

From September 16-17, 2024, Staff met with the City of Bowman's Gas System via Teams meeting to perform a follow-up inspection of the Operators previously existing probable violations. (Ref. Inspection Number JH21-026 and JS21-024). Exit meeting conducted on September 30, 2024.

During this inspection, the Operator was represented by:
Loyd Ivester – Gas Supervisor
James Jordan – Gas Technician
Bruce Bagnasco – MGAG/SRCS (Consultant)

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

At the time of this inspection, the City of Bowman Gas System was under three (3) previously existing probable violations. The Operator is negotiating a Consent Agreement with the Director for the proposed civil penalties for probable violations which were cited in Inspection Numbers LB19-001, JH21-026 and JS21-024.

Inspection Number	Violation Cited	Proposed Civil Penalty	Date Cleared	Insp # Cleared
LB19-001	§192.616(c)	$5,000.00	11/18/2019	DL19-052
JH21-026	§192.605(a) / §192.747(a)	$2,500.00	9/17/2024	DJ24-037
JH21-026	§192.605(a) / §192.625(f)	$2,500.00	9/17/2024	DJ24-037
JH21-026	§192.605(a) / §192.465(a)	$2,500.00	9/17/2024	DJ24-037
JH21-026	§192.605(a) / §192.465(b)(1)	$2,500.00	9/17/2024	DJ24-037
JS21-024	§192.805(b)	$2,500.00	9/17/2024	DJ24-037

PROBABLE VIOLATION CLEARED

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

1. In regard to the Probable Violation of 49CFR §192.605(a) which was cited in Inspection Number JH21-026; in that inspection Staff cited seven observed deficiencies:

    a. In regard to the Probable Violation of §192.605(a) / 192.747(a) which was cited in Inspection Number JH21-026; in that inspection Staff stated: "The City of Bowman failed to demonstrate that they performed inspections of the valves they identified as being necessary for the safe operation of their distribution system as required by §192.747(a) and their procedures for CY's 2017 and 2019."

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

    FIRST OPERATOR RESPONSE: In their response to Inspection Number JH21-026, dated March 3, 2022, the Operator requested an informal conference for this probable violation and stated that: "Since the hiring of two natural gas technicians in summer of 2020, the City of Bowman ("Bowman') checked and serviced its critical valves in accordance with its Operations and Maintenance Manual and Part 192.747(a). Documentation is available for Staff's review. Bowman has a plan in-place for checking and servicing its critical valves in 2022 and will ensure that this requirement is also met in the future."

FIRST FOLLOW-UP INSPECTION: During this inspection, the Operator provided records (Appendix Z-3) showing that the twelve critical valves have been inspected for CY2021 through CY2024 in accordance with its Operations and Maintenance Manual and Part 192.747(a). Staff found that this information adequately addresses this violation.

Staff determined that this observed deficiency has been addressed.

b. In regard to the Probable Violation of §192.605(a) / 192.625(f) which was cited in Inspection Number JH21-026; in that inspection Staff stated: "The City of Bowman failed to perform the monitoring of odorization for their distribution system as required by §192.625(f) and their O&M procedures."

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

FIRST OPERATOR RESPONSE: In their response to Inspection Number JH21-026, dated March 3, 2022, the Operator the Operator requested an informal conference for this probable violation and stated: "Since the hiring of two natural gas technicians in summer of 2020, Bowman has conducted odorant sampling at least quarterly in accordance with its Operations and Maintenance Plan and Part 192.625(f). Documentation is available for Staff's review. Bowman has a plan in-place for conducting odorant sampling in 2022 and will ensure that this requirement is also met in the future."

FIRST FOLLOW-UP INSPECTION: During this inspection, the Operator provided records (2021, 2022, 2023, and 2024) showing that Bowman conducted odorant sampling at least quarterly in accordance with its Operations and Maintenance Plan (Appendix U-1) and Part 192.625(f). Staff found that this information adequately addresses this violation.

Staff determined that this observed deficiency has been addressed.

c. In regard to the Probable Violation of §192.605(a) / 192.743(a) which was cited in Inspection Number JH21-026; in that inspection Staff stated: "The City of Bowman failed to demonstrate that their relief devices had sufficient capacity by testing the devices in place or by review and calculations for CY2016."

FIRST OPERATOR RESPONSE: In their response to Inspection Number JH21-026, dated March 3, 2022, the Operator stated that: "Since the hiring of a new natural gas technician in December 2017, Bowman has documented sufficient capacity of its relief valves in accordance with its Operations and Maintenance Manual and Part 192.743(a). Documentation is available for Staff's review. Bowman will ensure that relief capacity is confirmed and documented in 2022 and will ensure that this requirement is also met in the future."

FIRST FOLLOW-UP INSPECTION: During this inspection, the Operator provided records (CY2018 through CY2023) for its Transco Gate Station regulator station that documented sufficient capacity of its relief valves in accordance with its Operations and Maintenance Manual and Part 192.743(a). Staff found that this information adequately addresses this violation.

Staff determined that this observed deficiency has been addressed.

d. In regard to the Probable Violation of §192.605(a) / 192.739(a) which was cited in Inspection Number JH21-026; in that inspection Staff stated: "The City of Bowman failed to demonstrate that

each of their pressure limiting stations, pressure regulating stations, and relief devices were inspected as required by §192.739(a) and their O&M procedures in CY2016."

FIRST OPERATOR RESPONSE: In their response to Inspection Number JH21-026, dated March 3, 2022, the Operator stated that: "Since the hiring of a new gas technician in December 2017. Bowman has had its regulator station inspected in accordance with the requirements of its Operations and Maintenance Manual and Part 192.739(a). Documentation is available for Staff's review. Bowman will ensure that regulator stations are inspected and documented appropriately in 2022 and will ensure that this requirement is also met in the future."

FIRST FOLLOW-UP INSPECTION: During this inspection, the Operator provided records for its Transco Gate Station regulator station from CY2018 through CY2023 that documented Bowman has inspected this regulator station as required by §192.739(a). Staff found that this information adequately addresses this violation.

Staff determined that this observed deficiency has been addressed.

e. In regard to the Probable Violation of §192.605(a) / 192.721(b)(1) which was cited in Inspection Number JH21-026; in that inspection Staff stated: "The City of Bowman failed to demonstrate that the performed patrolling of their distribution system as required by §192.721(b) and their O&M procedures."

FIRST OPERATOR RESPONSE: In their response to Inspection Number JH21-026, dated March 3, 2022, the Operator stated: "Since the hiring of a new natural gas technician in December 2017, Bowman performed patrolling quarterly in accordance with its Operations and Maintenance Manual and Part 192.721(b). Documentation is available for Staff's review. Bowman will ensure that patrolling is performed and documented appropriately in 2022 and will ensure that this requirement is also met in the future."

FIRST FOLLOW-UP INSPECTION: During this inspection, the Operator provided records (2021, 2022, 2023, and 2024) showing that Bowman conducted distribution quarterly patrolling (Appendix V-4) as required by §192.721(b) and their O&M procedures. Staff found that this information adequately addresses this violation.

Staff determined that this observed deficiency has been addressed.

f. In regard to the Probable Violation of §192.605(a) / 192.465(a) which was cited in Inspection Number JH21-026; in that inspection Staff stated: "The City of Bowman failed to perform cathodic protection monitoring of their CP system as required by §192.465(a) and their O&M procedures."

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

FIRST OPERATOR RESPONSE: In their response to Inspection Number JH21-026, dated March 3, 2022, the Operator the Operator requested an informal conference for this probable violation and stated that: "Since 2019, Bowman performed cathodic protection monitoring in accordance with its Operations and Maintenance Manual and Part 192.465, including taking on/off readings. Bowman's current CP monitoring contractor uses both -850 mV and 100 mV shift criteria. Documentation is available for Staff's review. Bowman will ensure that cathodic protection monitoring is performed appropriately in 2022 and will ensure that this requirement is also met in the future."

FIRST FOLLOW-UP INSPECTION: During this inspection, the Operator provided cathodic protection survey data records (2021, 2022, 2023, and 2024) showing that Bowman is performing cathodic protection monitoring of their CP system as required by §192.465(a) and their O&M procedures. Staff found that this information adequately addresses this violation.

Staff determined that this observed deficiency has been addressed.

g. In regard to the Probable Violation of §192.605(a) / 192.465(b)(1) which was cited in Inspection Number JH21-026; in that inspection Staff stated: "The City of Bowman failed to demonstrate that they inspected each cathodic protection rectifier or impressed current power source six times each calendar year, but with intervals not exceeding 2 ½ months, as required by 192.465(b)(1) and their O&M procedures."

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

FIRST OPERATOR RESPONSE: In their response to Inspection Number JH21-026, dated March 3, 2022, the Operator the Operator requested an informal conference for this probable violation and stated that: "Bowman inspected its previously installed Rehoboth rectifier monthly in 2021. Bowman installed a new rectifier (Monday Street) in March 2021 and inspected this rectifier monthly from March through December. Documentation of these inspections is available for Staff's review. Bowman will ensure that its rectifiers are inspected at or beyond the minimum frequency in the future."

FIRST FOLLOW-UP INSPECTION: During this inspection, the Operator provided records (2021, 2022, 2023, and 2024) showing that Bowman inspected each cathodic protection rectifier or impressed current power source six times each calendar year (Appendix J-2). Staff found that this information adequately addresses this violation.

Staff determined that this observed deficiency has been addressed.

Staff determined that this Probable Violation could be cleared at this time.

2. In regard to the Probable Violation of §192.805(b) which was cited in Inspection Number JS21-024; in that inspection Staff stated: "The City of Bowman Gas System failed to ensure through evaluation that individuals performing covered tasks on their natural gas system from approximately December 2019 through September 2020 were qualified to do so."

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

FIRST OPERATOR RESPONSE: In their response to Inspection Number JS21-023/JS21-024, dated March 3, 2022, the Operator requested an informal conference for this probable violation and stated that: "Bowman reviewed City of Royston's Operator Qualification Plan and related Procedures and found them to be acceptable (They are the same as Bowmans's Plan and Procedures). In the future, Bowman will request and review qualifications records of individuals who may perform Covered Tasks on Bowman's pipeline system prior to performance of the Covered Tasks. Individuals who perform Covered Tasks will be required to have photographic identification with them at all times so that records can be related to individual workers."

FIRST FOLLOW-UP INSPECTION: During this inspection, the Operator provided GUFA training records and OQ qualification records for Loyd Ivester showing that this individual performing covered

tasks on Bowman's natural gas system from 2021 through 2024 was qualified to do so. Staff found that this information adequately addresses this violation.

Staff determined that this Probable Violation could be cleared at this time.

3. In regard to the Notice of Amendment for the Probable Violation of 49CFR, §192.181(a) which was cited under Inspection Number JH21-026, in that inspection Staff stated: "The City of Bowman must amend their procedures to address the placement of valves for compliance with the requirements of §192.181(c)."

   FIRST OPERATOR RESPONSE: In their response to Inspection Number JH21-026, dated March 3, 2022, the Operator stated that: "By April 30, 2022, Bowman will implement criteria for determining the placement of valves in newly constructed distribution lines. Bowman 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 Bowman's manuals. plans. and procedures. as appropriate."

   FIRST FOLLOW-UP INSPECTION: During this inspection, the Operator provided documentation from its Construction manual, Section E, which addresses the placement of valves for compliance with the requirements of §192.181(c). Staff found that this information adequately addresses this violation.

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

Please review and respond to this report in accordance with the attached Instructions for Responding to Enforcement Letters Issued by the Georgia Public Service Commission.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

IN THE MATTER OF:	)	
	)	
City of Bowman Gas Department	)	**DOCKET NO. 37028**
	)	
	)	
	)	

CERTIFICATE OF SERVICE

I, do hereby certify that I have this day served a copy of the within and foregoing document on the following persons via email or United States Mail as follows:

*Sallie Tanner, Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334

*The Honorable Leah Carey, Mayor
City of Bowman Gas Department
25 Prince Ave
Bowman, GA 30624
bowmancity@bellsouth.net

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

Respectfully Submitted this 10th day of February 2025:

Cathy Nesbitt

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