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DOCKET# 37080
DOCUMENT# 221692

Docket No. 37080

Town of Shellman Gas Department
P. O. Box 60
Shellman, GA 39886

REF: Follow Up Inspection # JJ24-021

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. James Weathersby

On May 13, 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 JJ24-021 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. 37080 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: JJ24-021

OPERATOR: Town of Shellman Gas Department

INVESTIGATOR: Joe Jones

INSPECTION DATE: May 13, 2024 REPORT MAILED DATE: February 26, 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
192.616(c)	The operator must follow the general program recommendations, including baseline and supplemental...	AT17-046	11/21/2017
515-9-3-.08	Written Formal Notice of Violation	JS20-003	1/21/2020
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	JS20-003	1/21/2020
515-9-3-.08	Written Formal Notice of Violation	DL20-035	10/26/2020
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	DL20-036	10/27/2020
192.615(b)(2)	Train the appropriate operating personnel to assure that they are knowledgeable of the emergency...	DL20-036	10/27/2020
192.615(c)	Each operator shall establish and maintain liaison with appropriate fire, police, and other...	DL20-036	10/27/2020
192.1011	What records must an operator keep?	DL20-036	10/27/2020
192.603(b)	Each operator shall keep records necessary to administer the procedures established under §192.605.	DL20-036	10/27/2020
192.479(a)	Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the...	DL20-036	10/27/2020
192.615(b)(3)	Review employee activities to determine whether the procedures were effectively followed in each...	DL20-036	10/27/2020
192.707(a)(1)	Line markers for mains and transmission lines. Buried pipelines. Except as provided in paragraph...	DL20-036	10/27/2020
192.353(a)	Each meter and service regulator, whether inside or outside a building, must be installed in	DL20-036	10/27/2020

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

CITY OF SHELLMAN GAS DEPARTMENT / FOLLOW-UP INSPECTION
INSPECTION NUMBER JJ24-021 / DOCKET NUMBER 37080

On May 13, 2024, Pipeline Safety Staff started reviewing Shellman gas department's preexisting violations. On May 20, 2024, Staff reported to the City of Shellman for the follow-up inspection of the Gas Department's previously existing probable violations.

During this inspection, the Operator was represented by:
Michelle Graham - City Clerk
Jonathan Smith - City of Shellman Gas Superintendent
Peter Schultz - Harp & Associates (Consultant)

Commission Staff was represented by:
Joseph Jones - Lead Inspector
Jason Smith – Pipeline Inspector
Glen Murphy - Pipeline Safety Inspector
Eric Atkins - Pipeline Safety Inspector

NOTE: At the time of this inspection the Town of Shellman was in negotiations with the Director for the following proposed civil penalties.

INSP #	Ref	Proposed Penalty	Violation Cleared in	Violation Cleared Date
CW14-054	§192.465(b)	$2,500.00	AT17-045	11/20/2017
CW14-054	§192.465(d)	$2,500.00	DL20-035	10/26/2020
DJ16-007	§192.195	$2,500.00	Continuing	
DJ16-007	§192.465(d)	$2,500.00	Continuing	
DJ16-007	Violation of Consent Agreement	$5,000.00	Continuing	
AT17-046	§192.616(c)	$7,500.00	Continuing	
DL20-035	Written Formal Notice of Violation	$2,500.00	Continuing	
DL20-036	§192.603(b)	$2,500.00	Continuing	
DL20-036	§192.605(a)	$2,500.00	Continuing	
DL20-036	§192.615(b)(2)	$2,500.00	Continuing	
DL20-036	§192.615(b)(3)	$2,500.00	Continuing	
DL20-036	§192.615(c)	$2,500.00	Continuing	
JJ24-022	Written Formal Notice of Violation	$5,000.00	Continuing	
TOTAL PROPOSED CIVIL PENALTIES		$42,500.00		

At the time of this inspection, the City of Shellman Gas Department was under twelve (12) previously existing probable violations. Staff reviewed these probable violations with the Operator and determined that:

PROBABLE VIOLATIONS CONTINUING

1. In regard to the probable violation of 49CFR §192.353(a) which was cited in Inspection Number DL20-036; in that inspection Staff stated that: The Operator failed to ensure customer meters were installed in a manner to be protected from corrosion and other damage as required in 192.353(a).

   FIRST OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL20-036.

FIRST FOLLOW-UP INSPECTION: On May 5, 2022, Staff requested the City of Shellman's Methane Emissions O&M Plan, along with documentation to support the plan and other relevant documentation for hazardous leaks and releases of gas. On May 24, 2022, The City of Shellman replied with the requested information and Staff began the inspection on June 7, 2022. (Ref. DL22-025). In that inspection Staff stated: "At the time of this inspection, the City of Shellman was under twelve (12) probable violation and one (1) previously existing consent agreement. Staff did not follow up on these at the time of this inspection."

SECOND OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL22-025.

SECOND FOLLOW-UP INSPECTION: On June 16, 2022, Staff reported to the City of Shellman Gas Department to perform an inspection of the Operator's Methane Emission Reduction Plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number JJ22-032) In that inspection Staff stated: "At the time of this inspection the City of Shellman had thirteen (13) previously existing probable violations." Staff did not review these violations during this inspection.

THIRD OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number JJ22-032.

THIRD FOLLOW-UP INSPECTION: During this inspection Staff identified locations of concern from Inspection Number DL20-036 where customer meters were found to be in contact with the ground (soil or ground covering), which has the potential of being a corrosive environment. All ground (soil or ground covering) contact with customer meters have now been removed.

Staff determined that the Operator has taken action to address this violation; however, because they have failed to provide a written response in accordance with Commission Rule 515-9-3-.09 this violation cannot be cleared at this time.

2. In regard to the probable violation of 49CFR §192.707(a)(1) which was cited in Inspection Number DL20-036; in that inspection Staff stated that: Operator failed to install and maintain pipeline markers as required under Part 192.707(a)(1) and their O&M procedures.

   FIRST OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL20-036.

   FIRST FOLLOW-UP INSPECTION: On May 5, 2022, Staff began an inspection on the Operator's Methane Emission Reduction Plan (DL22-025). At the time of this inspection Staff did not follow up on the previously existing violations.

   SECOND OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL22-025.

   SECOND FOLLOW-UP INSPECTION: On June 16, 2022, Staff reported to Shellman to begin an inspection on the Operator's Methane Emission Reduction Plan (JJ22-032). At the time of this inspection Staff did not follow up on the previously existing violations.

   THIRD OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number JJ22-032.

THIRD FOLLOW-UP INSPECTION: During this inspection (JJ24-021) Staff identified locations of concern from Inspection Number DL20-036. The Operator has now placed line markers at public road crossings throughout most of their system as well as "sight to sight" considerations.

Staff determined that the Operator has taken action to address this violation; however, because they have failed to provide a written response in accordance with Commission Rule 515-9-3-.09 this violation cannot be cleared at this time.

3. In regard to the probable violation of 49CFR §192.479(a) which was cited in Inspection Number DL20-036; in that inspection Staff stated that: The Operator failed to clean and coat pipeline as required by 192.479(a) and their O&M procedures.

   FIRST OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL20-036.

   SECOND FOLLOW-UP INSPECTION: On May 5, 2022, Staff began an inspection on the Operator's Methane Emission Reduction Plan (DL22-025). At the time of this inspection Staff did not follow up on the previously existing violations.

   SECOND OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL22-025.

   SECOND FOLLOW-UP INSPECTION: On June 16, 2022, Staff reported to Shellman to begin an inspection on the Operator's Methane Emission Reduction Plan (JJ22-032). At the time of this inspection Staff did not follow up on the previously existing violations.

   THIRD OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number JJ22-032.

   THIRD FOLLOW-UP INSPECTION: During this inspection (JJ24-021) Staff identified locations of concern from Inspection Number DL20-036. Multiple locations where lack of proper coating exposing pipe to the potential of atmospheric corrosion has been repaired.

   Staff determined that the Operator has taken action to address this violation; however, because they have failed to provide a written response in accordance with Commission Rule 515-9-3-.09 this violation cannot be cleared at this time.

4. In regard to the probable violation of 49CFR §192.615(b)(2) which was cited in Inspection Number DL20-036; in that inspection Staff stated that: The City of Shellman failed to demonstrate that they provided training of their emergency procedures as required by §192.615(b)(2).

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

   FIRST OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL20-036.

FIRST FOLLOW-UP INSPECTION: On May 5, 2022, Staff began an inspection on the Operator's Methane Emission Reduction Plan (DL22-025). At the time of this inspection Staff did not follow up on the previously existing violations.

SECOND OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL22-025.

SECOND FOLLOW-UP INSPECTION: On June 16, 2022, Staff reported to Shellman to begin an inspection on the Operator's Methane Emission Reduction Plan (JJ22-032). At the time of this inspection Staff did not follow up on the previously existing violations.

THIRD OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number JJ22-032.

THIRD FOLLOW-UP INSPECTION: During this inspection (JJ24-021) Staff reviewed documentation from Dec. 2021 through Dec.2023 that indicated Operator has provided training in their emergency procedures as required by §192.615(b)(2).

Staff determined that the Operator has taken action to address this violation; however, because they have failed to provide a written response in accordance with Commission Rule 515-9-3-.09 this violation cannot be cleared at this time.

5. In regard to the probable violation of 49CFR §192.615(b)(3) which was cited in Inspection Number DL20-036; in that inspection Staff stated that: The City of Shellman failed to review employee activities of their emergency response as required by §192.615(b)(3).

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

   FIRST OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL20-036.

   FIRST FOLLOW-UP INSPECTION: On May 5, 2022, Staff began an inspection on the Operator's Methane Emission Reduction Plan (DL22-025). At the time of this inspection Staff did not follow up on the previously existing violations.

   SECOND OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL22-025.

   SECOND FOLLOW-UP INSPECTION: On June 16, 2022, Staff reported to Shellman to begin an inspection on the Operator's Methane Emission Reduction Plan (JJ22-032). At the time of this inspection Staff did not follow up on the previously existing violations.

   THIRD OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number JJ22-032.

   THIRD FOLLOW-UP INSPECTION: During this inspection (JJ24-021) Staff reviewed work orders from 2020 through 2024 and determined that the Operator has been reviewing all work orders and photographing all instances. The Operator has had no emergencies.

Staff determined that the Operator has taken action to address this violation; however, because they have failed to provide a written response in accordance with Commission Rule 515-9-3-.09 this violation cannot be cleared at this time.

6. In regard to the probable violation of 49CFR §192.615(c)(1)(2)(3)(4) which was cited in Inspection Number DL20-036; in that inspection Staff stated that: The City of Shellman failed establish and maintain liaisons as required by §192.615(c).

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

   FIRST OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL20-036.

   FIRST FOLLOW-UP INSPECTION: On May 5, 2022, Staff began an inspection on the Operator's Methane Emission Reduction Plan (DL22-025). At the time of this inspection Staff did not follow up on the previously existing violations.

   SECOND OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL22-025.

   SECOND FOLLOW-UP INSPECTION: On June 16, 2022, Staff reported to Shellman to begin an inspection on the Operator's Methane Emission Reduction Plan (JJ22-032). At the time of this inspection Staff did not follow up on the previously existing violations.

   THIRD OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number JJ22-032.

   THIRD FOLLOW-UP INSPECTION: During this inspection (JJ24-021) Staff reviewed documentation from 12/04/2020 through 11/20/2023 that confirmed Shellman has performed its Liaison meeting with the appropriate agencies affiliated with the City of Shellman. Proper documentation is being kept and is available for review at City Hall.

   Staff determined that the Operator has taken action to address this violation; however, because they have failed to provide a written response in accordance with Commission Rule 515-9-3-.09 this violation cannot be cleared at this time.

7. In regard to the probable violation of 49CFR §192.605(a) which was cited in Inspection Number DL20-036; in that inspection Staff stated that: The City of Shellman failed to demonstrate that they reviewed and updated their O&M and Emergency Procedures at intervals not exceeding 15 months, but at least once each calendar year for CY's 2016 through 2019.

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

   FIRST OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL20-036.

   FIRST FOLLOW-UP INSPECTION: On May 5, 2022, Staff began an inspection on the Operator's Methane Emission Reduction Plan (DL22-025). At the time of this inspection Staff did not follow up on the previously existing violations.

SECOND OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL22-025.

SECOND FOLLOW-UP INSPECTION: On June 16, 2022, Staff reported to Shellman to begin an inspection on the Operator's Methane Emission Reduction Plan (JJ22-032). At the time of this inspection Staff did not follow up on the previously existing violations.

THIRD OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number JJ22-032.

THIRD FOLLOW-UP INSPECTION: During this inspection (JJ21-024) Staff reviewed the Operator's new updated O&M manual dated 2020. All reviews of the Operator's manual have been done each year since 2020.

Staff determined that the Operator has taken action to address this violation; however, because they have failed to provide a written response in accordance with Commission Rule 515-9-3-.09 this violation cannot be cleared at this time.

8. In regard to the probable violation of 49CFR §192.616(c) which was cited in Inspection Number AT17-046; in that Public Awareness Program inspection Staff stated that: Based on the deficiencies identified under Questions 2.02, 2.04, 2.06, 4.02, 4.04, 4.05, 4.06, and 4.07 of the PHMSA Public Awareness Program Effectiveness Inspection Checklist, the City of Shellman has failed to conduct a Public Awareness Program as required by 49CFR §192.616.

   Staff proposed a civil penalty of $7,500.00 for this violation

   OPERATORS FIRST RESPONSE: In their response letter to Inspection Number AT17-046, that was received on July 25, 2018, the Operator stated:

   > "The City has made multiple changes and improvements to their Public Awareness program in accordance with the guidance from GPSC staff and the RP1162. Each deficiency was addressed as follows:
   >
   > Question 2.02 - The city has revised its message and delivery method. The proper criteria is now fully included in the City's baseline message.
   >
   > Question 2.04 - The city has reviewed its frequency of baseline messages to each stakeholder audience. The city will keep proper documentation to prove that it is meeting or exceeding the baseline frequency for each of these groups.
   >
   > Question 2.06 - The city has performed its Liaison meeting with the appropriate agencies affiliated with the City of Shellman. Proper documentation is being kept and is available for review at City Hall.
   >
   > Question 4.02 & 4.04 - The City has revised its questionnaire to cover information needed to measure understandability of message content. The city has now implemented a process to track the number of messages received in each stakeholder audience.

Question 4.05 - (Staff's Comment) The city of Shellman did not address this item in their response.

Question 4.06 - The city has a process in place to measure bottom line results. The city has carried out this process. Bottom Line results are available on site and in the Public Awareness Plan.

Question 4.07 - The city has made program changes that all comply with state and federal law, along with RP1162. All changes have been documented and are available for review on site.

In addition, in their response letter to Inspection Number AT17-046, the operator stated: "The City of Shellman does not contest the probable violations, but the city does wish to mitigate the civil penalty of $7,500. The City of Shellman wishes to continue to put money back into its gas system. The City wishes to allocate these funds to system upgrades such as training, PAP materials, Cathodic Protection remediation, and leak detection equipment."

FIRST FOLLOW-UP INSPECTION: On May 14, 2018, Staff reported to the City of Shellman Gas Department to perform an inspection of the Operator's Qualification Program. (Ref. Inspection Number JS18-016) In that inspection Staff stated "At the time of this inspection, the City of Shellman Gas Department was under four (4) previously existing probable violations. Staff did not review these probable violations because at the time of this inspection the Operator had not received their last follow-up inspection (AT17-045)."

SECOND OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number JS18-016.

SECOND FOLLOW-UP INSPECTION: On January 21, 2020, Staff conducted a follow-up inspection of the Operator's previously existing probable violations. (Ref. Inspection Number JS20-003) In that inspection Staff stated: "During this inspection (JS20-003) Staff determined that Public Awareness Program deficiencies have not been addressed as the Operator's July 2018 response letter states."

THIRD OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number JS20-003.

THIRD FOLLOW-UP INSPECTION: On July 15, 2020, Staff requested information pertaining to the City of Shellman's DIMP Plan. On September 22, 2020, Staff met online with representatives from the City of Shellman Gas Department to perform an Annual Review of their Distribution Integrity Management Program (DIMP) as required under the PHMSA State Programs Guidelines. (Ref. Inspection Number JJ20-025). In that inspection Staff stated: "At the time of this inspection, the City of Shellman Gas Department had Four (4) previously existing probable violations. Because this inspection was conducted on-line, and was specifically addressing the Operator's DIMP program, Staff did not review this violation."

FOURTH OPERATOR RESPONSE: In their response letter to Inspection Number JJ20-025, dated February 28, 2021, the Operator stated that; "The City of Shellman failed to perform or follow its Public Awareness Plan due to the fact that they had never had a written plan, or had it been explained to them how it worked. Harp and Associates set down with the City Clerk and the Mayor and discussed the plan with each of them so that they would know what was required of them. The City Clerk started sending out their letters to all customers plus also running the letter in the local newspaper. It will take a while

for the operator to get the PAP plan going in the right direction, but we will work with them until it is right and complies with all regulations. The City of Shellman has a new Public Awareness Plan on site and will start performing each project as required."

FOURTH FOLLOW-UP INSPECTION: On June 29, 2020, Staff conducted an inspection of the Operator's Anti-Drug and Alcohol Programs. (Ref. Inspection Number DJ20-023) In that inspection Staff stated: "At the time of this inspection, City of Shellman was under four (4) previously existing probable violations. These violations were addressed under Follow-Up Inspection Number JS20-003, which had not been received by the Operator at the time of this inspection."

FIFTH OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DJ20-023.

FIFTH FOLLOW-UP INSPECTION: On October 26, 2020, Staff conducted a Follow-up Inspection of the previous existing violations (Ref. Inspection Number DL20-035). In that inspection Staff stated: "During this inspection (DL20-035) Staff determined that Public Awareness Program deficiencies have not been addressed as the Operator's July 2018 response letter states."

SIXTH OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DI20-035.

SUPERVISOR REVIEW OF RESPONSE TO JJ20-025: On April 12, 2021, the Facilities Protection Unit Supervisor performed a review of the Town of Shellman's response letter to Inspection Number JJ20-025. (Ref. Inspection Number JB21-008) In that review Staff stated:

> "In their response to the probable violation of §192.616(c), received April 8, 2021, the City of Shellman stated:
>
> The City of Shellman failed to perform or follow its Public Awareness Plan due to the fact that they had never had a written plan, or had it been explained to them how it worked. Harp and Associates set down with the City Clerk and the Mayor and discussed the plan with each of them so that they would know what was required of them. The City Clerk started sending out their letters to all customers plus also running the letter in the local newspaper. It will take a while for the operator to get the PAP plan going in the right direction, but we will work with them until it is right and complies with all regulations. The City of Shellman has a new Public Awareness Plan on site and will start performing each project as required.
>
> The FPU Supervisor notes that this answer is not only unacceptable, but it also cannot be correct. The City of Shellman has had a Public Awareness Plan in place since June 19, 2006, because that is the date of the plan they submitted to the PHMSA PAP clearinghouse for review. In addition, Staff has performed two (2) previous public awareness program audits on the City of Shellman; Inspection Number LB12-070 in November of 2012; and Inspection Number AT17-046 in November of 2017. The Operator received Notices of Probable Violations and proposed civil penalties in both of these inspections.
>
> The FPU Supervisor also notes that in Inspection Number DL20-036 Staff issued a Letter of Concern in which they stated: "During this inspection, Staff found that the City of Shellman had changed consulting agencies for their natural gas distribution system and they no longer had access to copies of their previous procedures and records. Staff is concerned that the Operator's failure to maintain copies of these items means that they

cannot demonstrate compliance with many of the requirements of the minimum federal safety standards, which can subject the City of Shellman to enforcement actions and civil penalties from the Commission. Staff recommends that the City of Shellman contact their former consultant and obtain copies of the items that the Operator is required to maintain."

After reviewing this violation with the inspectors who have attempted to follow-up on it over the last three years, the FPU Supervisor has determined that the Operators response is not sufficient to clear this violation."

SIXTH FOLLOW-UP INSPECTION: On May 5, 2022, Staff requested the City of Shellman's Methane Emissions O&M Plan, along with documentation to support the plan and other relevant documentation for hazardous leaks and releases of gas. On May 24, 2022, The City of Shellman replied with the requested information and Staff began the inspection on June 7, 2022. (Ref. Inspection Number DL22-025) In that inspection Staff stated: "At the time of this inspection, the City of Shellman was under twelve (12) probable violation and one (1) previously existing consent agreement. Staff did not follow up on these at the time of this inspection."

SEVENTH OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL22-025.

SEVENTH FOLLOW-UP INSPECTION: On June 16, 2022, Staff reported to Shellman to being an inspection on the Operators Methane Emission Reduction Plan (JJ22-032). Staff did not review the Operators' existing violations during this inspection.

EIGHTH OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number JJ22-032.

EIGHTH FOLLOW-UP INSPECTION: During this inspection (JJ24-021) Staff reviewed the Operators PAP program and determined that:

Question 2.02 - The City of Shellman has revised its message and delivery method. The proper criteria is now fully included in the City's baseline message.

- Staff reviewed evidence from 11/10/2020 through 3/24/2024 and determined that the Operator is meeting the requirements of the delivery method.

Question 2.04 - The City of Shellman has reviewed its frequency of baseline messages to each stakeholder audience. The City will keep proper documentation to prove that it is meeting or exceeding the baseline frequency to each of these groups.

- Staff reviewed evidence from 11/10/2020 through 3/24/2024 and determined that the Operator is keeping proper documentation to prove that it is meeting or exceeding the baseline frequency to each of these groups.

Question 2.06 - The City of Shellman has performed its Liaison meeting with the appropriate agencies affiliated with the City of Shellman. Proper documentation is being kept and is available for review at City Hall.

- Staff reviewed evidence from 12/04/2020 through 11/20/2023 and determined that the Operator is keeping proper documentation, and it is available for review at City Hall.

Question 4.02 through 4.07 - The City of Shellman has revised its questionnaire to cover information needed to measure understandability of message content. The City has now

implemented a process to track the number of messages received from each stakeholder audience.

- Staff reviewed evidence that the Operator has been performing effectiveness evaluations annually since 2020, in order to prepare for their actual mandated four-year effectiveness evaluation.

Question 4.06 - The City of Shellman has a process in place to measure bottom line results. The city has carried out this process. Bottom Line results are available on site and in the Public Awareness Plan.

Question 4.07 - The city has made program changes that all comply with state and federal law, along with RP1162. All changes have been documented and are available for review on site. According to the Operator no changes need to be made.

Staff determined that the Operator has taken some actions to address this violation; however, because they have failed to provide a written response in accordance with Commission Rule 515-9-3-.09, this violation cannot be cleared at this time.

9. In regard to the probable violation of 49CFR §192.1011 which was cited in Inspection Number DL20-036; in that inspection Staff stated that: The City of Shellman failed to maintain 10 years of records as required by 192.1011.

   FIRST OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL20-036.

   FIRST FOLLOW-UP INSPECTION: On May 5, 2022, Staff began an inspection on the Operator's Methane Emission Reduction Plan (DL22-025). At the time of this inspection Staff did not follow up on the previously existing violations.

   SECOND OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL22-025.

   SECOND FOLLOW-UP INSPECTION: On June 16, 2022, Staff reported to Shellman to begin an inspection on the Operator's Methane Emission Reduction Plan (JJ22-032). At the time of this inspection Staff did not follow up on the previously existing violations.

   THIRD OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number JJ22-032.

   THIRD FOLLOW-UP INSPECTION: On May 20, 2024, Staff reported to the City of Shellman to perform a follow-up inspection (JJ24-021) of previous existing violations. Staff reviewed Shellman's Distribution Integrity Management Plan version 3.2.1, effective 1/17/2020. The Operator could not provide a Distribution Integrity Management Plan dated further back than 1/17/2020.

   Staff determined that the Operator has not taken action to address this violation and they have failed to provide a written response in accordance with Commission Rule 515-9-3-.09. Staff determined that this violation cannot be cleared at this time.

10. In regard to the probable violation of 49CFR §192.603(b) which was cited in Inspection Number DL20-036; in that report Staff stated: "Based on the deficiencies noted below, Staff determined that the City of Shellman failed to maintain records as required by 192.603(b)."

    The noted deficiencies were:

    a. For the noted deficiency of §192.727(a)(b) Staff stated: "The Operator advised that they have abandoned facilities over the last five years, however, they have not maintained records to allow Staff to verify compliance with 192.727(a) or (b)."

    b. For the noted deficiency of §192.751(a)(b)(c) Staff stated: "Operator has not maintained records to allow Staff to verify compliance with §192.751."

    c. For the noted deficiency of §192.747(a) Staff stated: "The Operator's O&M manual states in Section M, (Page 120 of 153) "The Gas Superintendent or his designee will complete the "Valve Maintenance Record Form" See Appendix F in this manual for forms and keep this as a permanent record in Gas Superintendent's office. During this inspection the Operator could not produce records to demonstrate that their valves had been checked and serviced in CY's 2016 through 2019 as required by §192.747(a) and their O&M procedures."

    d. For the noted deficiency of §192.605(b)(8) Staff stated that: "The Operator could not produce work orders for CY's 2016 through 2019. The Operator could not demonstrate that they had periodically reviewed the work performed by personnel on their distribution system to ensure that their procedures were affective and adequate."

    e. For the noted deficiency of §192.721(b)(1)(2) Staff stated that: "The Operator could not produce documentation for patrolling of their distribution system for CY's 2016 through 2019."

    f. For the noted deficiency of §192.614(c)(1) Staff stated that: "The Operator could not produce records to demonstrate that they have identified the persons who normally engage in excavation activities in the area in which their pipeline facilities are located."

    g. For the noted deficiency of §192.481(a) Staff stated that: "In Section I of the Operator's O&M Manual (Page 77 of 153) it states: The Operator could not produce records to demonstrate that they have performed any atmospheric monitoring for CY's 2016 through 2019 as required by 192.481(a) and their O&M procedures.

    h. For the noted deficiency of §192.491(c) Staff stated that: "The Operator could not produce records which demonstrate the findings of each test, survey, or inspection required by this subpart as required 192.491(c) for CY2018."

    i. For the noted deficiency of §192.459; in that inspection Staff stated that: "The Operator could not produce work orders for CY's 2016 through 2019. The Operator could not demonstrate that they had performed an examination of their buried pipe when it was exposed as required by §192.459."

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

    FIRST OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL20-036.

FIRST FOLLOW-UP INSPECTION: On May 5, 2022, Staff began an inspection on the Operator's Methane Emission Reduction Plan (DL22-025). At the time of this inspection Staff did not follow up on the previously existing violations.

SECOND OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL22-025.

SECOND FOLLOW-UP INSPECTION: On June 16, 2022, Staff reported to Shellman to begin an inspection on the Operator's Methane Emission Reduction Plan (JJ22-032). At the time of this inspection Staff did not follow up on the previously existing violations.

THIRD OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number JJ22-032.

THIRD FOLLOW-UP INSPECTION: During this inspection (JJ24-021) Staff noted that:

a. For the noted deficiency of §192.727(a)(b): Staff determined that before 2020 the Operator had no pre-existing records for abandon services; however, since 2020 the Operator has documented all abandon services are documented on work orders.

   Staff determined that the Operator has taken action to address this violation; however, because they have failed to provide a written response in accordance with Commission Rule 515-9-3-.09 this violation cannot be cleared at this time.

b. For the noted deficiency of §192.751(a)(b)(c): Staff determined that before 2020, the Operator had no pre-existing records. Since 2020, the Operator has been documenting all work performed on their pipeline on work orders. The work orders indicate that the Gas Department is taking steps to prevent accidental ignition.

   Staff determined that the Operator has taken action to address this violation; however, because they have failed to provide a written response in accordance with Commission Rule 515-9-3-.09 this violation cannot be cleared at this time.

c. For the noted deficiency of §192.747(a): Staff determined that before 2020 the Operator had no pre-existing records for Valve Maintenance; however, since 2020, the Operator has documented all abandon services and all work.

   Staff determined that the Operator has taken action to address this violation; however, because they have failed to provide a written response in accordance with Commission Rule 515-9-3-.09 this violation cannot be cleared at this time.

d. For the noted deficiency of §192.605(b)(8): Staff determined that before 2020 the Operator had no pre-existing records for maintenance and work orders: however, since 2020 the Operator has documented all maintenance records and work orders.

   Staff determined that the Operator has taken action to address this violation; however, because they have failed to provide a written response in accordance with Commission Rule 515-9-3-.09 this violation cannot be cleared at this time.

e. For the noted deficiency of §192.721(b)(1)(2); Staff determined that before 2020 the Operator had no pre-existing records. The Operator could not produce documentation for patrolling their

distribution system for CY's 2016 through 2019; however, since 2020 the Operator has documented all maintenance records and work orders. services.

Staff determined that the Operator has taken action to address this violation; however, because they have failed to provide a written response in accordance with Commission Rule 515-9-3-.09 this violation cannot be cleared at this time.

f. For the noted deficiency of §192.614(c)(1); Staff determined that before 2020 operators had no pre-existing records. The Operator could not produce documentation that they have identified the people who normally engage in excavation activities in the area in which their pipeline facilities are located, however, since 2020 Operator has documented all maintenance records and work orders.

   Staff determined that the Operator has taken action to address this violation; however, because they have failed to provide a written response in accordance with Commission Rule 515-9-3-.09 this violation cannot be cleared at this time.

g. For the noted deficiency of §192.481(a): Staff determined that the Operator could not produce records to demonstrate that they have performed any atmospheric control monitoring for CY's 2016 through 2019 as required by 192.481(a) and their O&M procedures; however, since 2020 the Operator has documented all maintenance records and work orders.

   Staff determined that the Operator has taken action to address this violation; however, because they have failed to provide a written response in accordance with Commission Rule 515-9-3-.09 this violation cannot be cleared at this time.

h. For the noted deficiency of §192.491(c): Staff determined that the Operator could not produce records which demonstrate the findings of each test, survey, or inspection required by this subpart as required 192.491(c) for CY2018, however, since 2020 Operator has documented all maintenance records and work orders.

   Staff determined that the Operator has taken action to address this violation; however, because they have failed to provide a written response in accordance with Commission Rule 515-9-3-.09 this violation cannot be cleared at this time.

i. For the noted deficiency of §192.459: Staff noted that the Shellman Gas Department has not had any instance where their pipeline has been uncovered to perform an examination of the pipe for indications of corrosion or any other integrity compromises. The Operator has no records before 2020 for Staff to review.

   Staff determined that because the Operator has failed to provide a written response in accordance with Commission Rule 515-9-3-.09 this violation cannot be cleared at this time.

Staff determined that the Operator has taken action to address this violation; however, because they have failed to provide a written response in accordance with Commission Rule 515-9-3-.09 this violation cannot be cleared at this time.

11. In regard to the Warning Letter for the Probable Violation of Commission Rule 515-9-3-.08 which was cited in Inspection Number JS20-003; in that inspection Staff stated: "The City of Shellman failed to provide a written response to enforcement actions from the Commission."

    FIRST OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number JS20-003.

    FIRST FOLLOW-UP INSPECTION: On May 14, 2020, Staff conducted a DIMP Annual Review with the Operator. (Ref. Inspection Number JJ20-025) Staff did not review the previous existing violation at this time.

    SECOND OPERATOR RESPONSE: In their response letter to Inspection Number JJ20-025, Dated February 28, 2021, the operator stated that; These violations were written before Harp and Associates took over as consultant for this operator. Harp and Associates took over in January 2020. We feel that there is nothing we can do about this situation but will try if the PSC comes up with a correct way to do so.

    SECOND FOLLOW-UP INSPECTION: On June 29, 2020, Staff conducted an inspection of the Operator's Anti-Drug and Alcohol Programs. (Ref. Inspection Number DJ20-023) In that inspection Staff stated: "At the time of this inspection, City of Shellman was under four (4) previously existing probable violations. These violations were addressed under Follow-Up Inspection Number JS20-003, which had not been received by the Operator at the time of this inspection."

    THIRD OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DJ20-023.

    THIRD FOLLOW-UP INSPECTION: On October 26, 2020 Pipeline Safety Staff reported to the City of Shellman to perform a follow-up inspection of the Gas Department's previously existing probable violations. (Ref. Inspection Number DL20-035) In that inspection Staff stated: "During this inspection (DL20-035): Staff noted that the Operator has failed to address this item. Staff noted that the Operator has now failed to provide a response to Inspection Numbers JS18-016, AT17-045, DJ16-006, JS20-003 and DJ20-023. Staff has recommended enforcement through a proposed civil penalty for this continuing violation."

    FOURTH OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL20-035.

    SUPERVISOR REVIEW OF RESPONSE TO JJ20-025: In their response to the probable violation of Commission Rule 515-9-3-.08 (dated February 28, 2021) which was cited in Inspection Number JS20-003, the City of Shellman stated:

    "These violations were written before Harp and Associates took over as consultant for this operator. Harp and Associates took over in January 2020. We feel that there is nothing we can do about this situation but will try if the PSC comes up with a correct way to do"

    After reviewing this violation with the inspectors who have attempted to follow-up on it over the last three years, the FPU Supervisor has determined that the Operators response is not sufficient to clear this violation. While the Town of Shellman may elect to use contractors and/or consultants to assist them with the operation of their gas system, it is Shellman's responsibility as the Operator to ensure that they are in compliance with the minimum safety standards and the Commission's rules.

FOURTH FOLLOW-UP INSPECTION: On May 5, 2022, Staff began an inspection on the Operators Methan Emission Reduction Plan (DL22-025). At the time of this inspection Staff did not follow up on the previous existing violations.

FIFTH OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL22-025.

FIFTH FOLLOW-UP INSPECTION: On June 16, 2022, Staff reported to Shellman to being an inspection on the Operators Methan Emission Reduction Plan (JJ22-032). AT the time of this inspection Staff did not follow up on the previous existing violations.

SIXTH OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number JJ22-032.

SIXTH FOLLOW-UP INSPECTION: During this inspection (JJ24-021) Staff determined that there has been no action on the part of the Operator to correct this violation.

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

12. In regard to the proposed civil penalty which was cited as an additional enforcement action in Inspection Number DL20-035, for the continuing Probable Violation of Commission Rule 515-9-3-.08 which was cited in Inspection Number JS20-003; in that inspection (DL20-035) Staff stated: "The staff has reviewed the circumstances surrounding the continuing probable violation of Commission Rule 515-9-3-.08 cited in this report and has recommended the civil penalty listed below. Please note that this recommended amount is less than the amount authorized by Georgia law."

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

    FIRST OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL20-035.

    FIRST FOLLOW-UP INSPECTION: On May 5, 2022, Staff began an inspection on the Operators Methan Emission Reduction Plan (DL22-025). At the time of this inspection Staff did not follow up on the previous existing violations.

    SECOND OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL22-025.

    SECOND FOLLOW-UP INSPECTION: On June 16, 2022, Staff reported to Shellman to being an inspection on the Operators Methan Emission Plan (JJ22-032). AT the time of this inspection Staff did not follow up on the previous existing violations.

    THIRD OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number JJ22-032.

    THIRD FOLLOW-UP INSPECTION: During this inspection (Inspection Number JJ24-021) Staff determined that the Operator had failed to provide a response to the original and had filed no response to the subsequent violations at the time of this inspection.

    Staff determined that this deficiency 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.

OPERATOR RESPONSE FORM

Operator Name: Town of Shellman

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37080

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	Proposed Penalty for this violation
☐ 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:	)	
	)	
Town of Shellman Gas Department	)	**DOCKET NO. 37080**
	)	
	)	
	)	

CERTIFICATE OF SERVICE

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

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

*The Honorable James Weathersby, Mayor
Town of Shellman Gas Department
P.O. Box 60
Shellman, GA 39886
shellcityhall@windstream.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 2025:

Cathy Nesbitt

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