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Georgia Public Service Commission

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DOCKET# 37037
DOCUMENT# 221693

Docket No. 37037

City of Colquitt Gas System
154 West Street
Colquitt, GA 39837

REF: Follow Up Inspection # JJ24-042

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Cory Thomas

On August 8, 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 JJ24-042 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. 37037 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: JJ24-042

OPERATOR: City of Colquitt Gas System

INVESTIGATOR: Joe Jones

INSPECTION DATE: August 8, 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

3. CLEARED VIOLATIONS

Cleared on 8/8/2024

Violation	Description	Inspection#	Date
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	AT21-008	2/17/2021

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	JJ24-042	8/8/2024

5. OTHER RECOMMENDATIONS/COMMENTS

On August 12, 2024, Pipeline Safety Staff reported to the City of Colquitt Gas System and performed a follow-up inspection on the Operator's previously existing probable violations that were cited under AT21-008.

During this Inspection the Operator was represented by:
Emanuel Haire – Gas Superintendent
Sam Yarley - MGAG/SRCS (Consultant)

Commission Staff was represented by:
Joseph Jones – Lead Inspector
Chuck Whitaker – Pipeline Safety Inspector

At the time of this inspection the City of Colquitt Gas System was under one (1) previously existing probable violation. The City of Colquitt was also negotiating a Consent Agreement listed under inspection number AT23-012.

PROBABLE VIOLATIONS CLEARED

In regard to the Probable Violation of 49CFR, §192.605(a) / 192.465(d) which was cited in Inspection Number AT21-008; in that inspection Staff stated: "Based on the observed deficiencies indicated in this report, Staff determined that the Operator has failed to prepare and follow a manual of written procedures for conducting operations and maintenance activities and for emergency response."

In AT21-008 Staff cited six deficiencies under §192.605(a); at the time of this inspection the deficiency cited for 192.465(d) is the only one remaining to be addressed.

In regard to the observed deficiency of 49CFR, §192.465 which was cited in Inspection Number AT21-008; in that inspection Staff stated: "The Operator had no documentation that remedial action was or had been taken to correct the possible short. In their 2020 annual cathodic protection monitoring survey they reported that this test point at Pine Street West was missing. Again, Staff found no documentation that remedial action was or had been taken for the test point. During this inspection Staff was unable to locate test point.

Staff proposed a civil penalty of $2,500 for this probable violation.

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number AT21-008, dated February 22, 2022, the City of Colquitt stated that: "Colquitt will review cathodic protection survey reports with contractors performing this work to ensure that all deficiencies are understood and addressed. Colquitt has, also addressed the missing test point and is developing a plan to address the shorted casing."

FIRST FOLLOW-UP INSPECTION: On May 5, 2022, Staff requested the City of Colquitt'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 16, 2022, The City of Colquitt replied with the requested information and Staff began the inspection on May 17, 2022. (Ref, Inspection Number DL22-021) In that inspection Staff stated: "At the time of this inspection, the City of Colquitt was under one (1) previously existing consent agreement. Staff did not review this at the time of this inspection."

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number DL22-021, dated June 13, 2022, the City of Colquitt stated: "Colquitt will review cathodic protection survey reports with contractors performing this work to ensure that all deficiencies are understood and addressed. Colquitt has, also addressed the missing test point and is developing a plan to address the shorted casing."

SECOND FOLLOW-UP INSPECTION: On January 5, 2023, Staff reported to the City of Colquitt to perform an inspection of the Operator's implementation of their Distribution Integrity Management Program. (Ref. Inspection Number AT23-002) In that inspection Staff stated: "At the time of this inspection the City of Colquitt had one (1) previously existing probable violation. This violation will be addressed under Follow-Up Inspection Number AT23-001."

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number AT23-003, dated June 13, 2022, the City of Colquitt stated: "Colquitt will review cathodic protection survey reports with contractors performing this work to ensure that all deficiencies are understood and addressed. Colquitt has, also addressed the missing test point and is developing a plan to address the shorted casing."

INFORMAL CONFERENCE: On February 8, 2023, Staff conducted an informal conference with the City of Colquitt as requested in regard to Inspection Number AT21-008. (Ref. Inspection Number AT23-012) In that conference Staff stated: "Staff directed the Operator to submit their proposals for mitigation of the proposed civil penalties in writing no later than 14 days following this meeting. The Operator was advised that if their proposals were found to be acceptable, they would be provided with a consent agreement to review which would address the mitigation of the proposed civil penalty and the measures required to address the probable violations."

THIRD FOLLOWUP INSPECTION: During this inspection (JJ24-042), Staff Observed the Operator abandoning the section of pipeline at the Birdsong Peanut factory at Pine Street West. The casing was shorted by their impressed current system, Staff took photographs after work was completed, and the work order documentation was provided by the Operator. Staff found that the Operator adequately addressed this violation.

Staff determined that the Operator has addressed this violation and that it could be cleared at this time; however, they will still need to settle the issue of the proposed civil penalty with the Director.

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 Colquitt Gas System	)	**DOCKET NO. 37037**
	)	
	)	
	)	

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

*Cory J. Thomas, City Manager
City of Colquitt Gas System
154 West Street
Colquitt, GA 39837
cthomas@colquittga.org

*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