OPERATOR RESPONSE FORM

Operator Name: City of Social Circle

Informal Conference Requested: Yes X No ☐

Docket Number: 37081

Responses required within **30 days of electronic mail.** Provide the following information for this report:

Response to Inspection Number: JJ24-050

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: Not Applicable
   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 FORM

Operator Name: City of Social Circle

Informal Conference Requested: Yes X No ☐

Docket Number: 37081

Enforcement Action for: §192.465(d) ☐ 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	$5,000 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: The City of Social Circle is awaiting a response to this continuing violation from the follow-up inspection #JJ24-046. The City addressed the issues in the three locations cited in the inspection report #KR22-038 and has achieved adequate cathodic protection in all three locations. Documentation was provided to Staff during the follow-up inspection #JJ24-046. The City requests an informal conference to clear this violation and to negotiate a lower civil penalty.

Response Provided by: Rusty Johnson, Gas Superintendent (Name / Title) Date: 3/28/2025

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: _____

OPERATOR RESPONSE FORM

Operator Name: City of Social Circle

Informal Conference Requested: Yes X No ☐

Docket Number: 37081

Enforcement Action for: §192.625 (f) ☐ 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	$5,000.00 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: The City of Social Circle is awaiting a response to this continuing violation from the follow-up inspection #JJ24-046. During the inspection #KR22-038, the City could not find two years of odorometer calibration. However, the City later found those calibration certificates and provided those certificates during inspection #JJ24-046. The City is requesting an informal conference to clear this violation as well as the proposed civil penalty associated with it.

Response Provided by: Rusty Johnson, Gas Superintendent Date: 3/28/2025

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.

HEATH CONSULTANTS

NEW STYLE ODORATOR
CALIBRATION CERTIFICATE
1.00% Methane

SERIAL # 272

SERVICE CALL # 5855

TECH: S,BAZURTO

CAL DATE: 9-12-17

CAL DUE DATE: 12-12-18

MASS FLOW SENSOR DC OUTPUT VOLTAGE (PIN J1-7): 0.8

PANEL ZERO KNOB ADJUSTMENT RANGE ON LCD: +/- +9/-8

RP4 ON PC BOARD SET WITH A REF %GAS READING OF: 1.00

RP3 ON PC BOARD SET FOR AN ODORATOR LCD READING OF: 1.00

BLOWER MOTOR DC OUTPUT VOLTAGE : 1.41

RP1 ON PC BOARD SET FOR 1/2 TURN CCW WITH NO " L " ON LCD : YES? X

WITH THE ODORATOR READING " 50 " THE REF % GAS READING IS: .40

WITH THE ODORATOR READING " 20 " THE REF % GAS READING IS: .17

Next Day: Zero 0 1.00 Span 1.00

% GAS CORRECTION CHART - 1.00% METHANE HPN 0715631 REV D

ODORATOR READING	ACTUAL % GAS	ODORATOR READING	ACTUAL % GAS
0.00%	0.00%	0.80%	0.75%
0.10%	0.08%	0.90%	0.87%
0.20%	0.17%	1.00%	1.00%
0.30%	0.25%	1.10%	1.10%
0.40%	0.33%	1.20%	1.33%
0.50%	0.40%	1.30%	1.56%
0.60%	0.50%	1.40%	1.81%
0.70%	0.62%	1.50%	2.05%

This Odorator has been calibrated in conformance with Heath Calibration Procedure 100791 Rev E. The Gas mixture used for calibration is verified by direct comparison to calibration standards traceable to NIST ASTM Class 1 weights and /or NIST gas mixture reference materials.

Technician Name S,BAZURTO Signature:_____

HPN #: 101993-0 REV B

HEATH CONSULTANTS

NEW STYLE ODORATOR
CALIBRATION CERTIFICATE
1.00% Methane

SERIAL # 272

WO # 201815

TECH: J.RANGEL

CAL DATE: 2-22-17

CAL DUE DATE: 5-22-18

MASS FLOW SENSOR DC OUTPUT VOLTAGE (PIN J1-7): 0.8

PANEL ZERO KNOB ADJUSTMENT RANGE ON LCD: +/- +8/-8

RP4 ON PC BOARD SET WITH A REF %GAS READING OF: 1.00

RP3 ON PC BOARD SET FOR AN ODORATOR LCD READING OF: 1.00

BLOWER MOTOR DC OUTPUT VOLTAGE : 1.38

RP1 ON PC BOARD SET FOR 1/2 TURN CCW WITH NO " L " ON LCD : YES? +

WITH THE ODORATOR READING " 50 " THE REF % GAS READING IS: .37

WITH THE ODORATOR READING " 20 " THE REF % GAS READING IS: .14

Next Day: Zero 0 1.00 Span 1.00

% GAS CORRECTION CHART - 1.00% METHANE HPN 0715631 REV D

ODORATOR READING	ACTUAL % GAS	ODORATOR READING	ACTUAL % GAS
0.00%	0.00%	0.80%	0.75%
0.10%	0.08%	0.90%	0.87%
0.20%	0.17%	1.00%	1.00%
0.30%	0.25%	1.10%	1.10%
0.40%	0.33%	1.20%	1.33%
0.50%	0.40%	1.30%	1.56%
0.60%	0.50%	1.40%	1.81%
0.70%	0.62%	1.50%	2.05%

This Odorator has been calibrated in conformance with Heath Calibration Procedure 100791 Rev E. The Gas mixture used for calibration is verified by direct comparison to calibration standards traceable to NIST ASTM Class 1 weights and /or NIST gas mixture reference materials.

Technician Name J.RANGEL Signature: Jaime Rangel

HPN #: 101993-0 REV B