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Georgia Public Service Commission

(404) 463-6526
(800) 282-5813

244 Washington Street, SW
Atlanta, GA 30334-5701

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

DOCKET# 37022
DOCUMENT# 222319

Docket No. 37022

City of Andersonville Gas System
P. O. Box 35
Andersonville, GA 31711

REF: Follow Up Inspection # DC24-031

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Ms. Velma Coley

On July 30, 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 DC24-031 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. 37022 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: DC24-031

OPERATOR: City of Andersonville Gas System

INVESTIGATOR: Daniel Clemmons

INSPECTION DATE: July 30, 2024 REPORT MAILED DATE: April 16, 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 7/30/2024

Violation	Description	Inspection#	Date
192.603(c)	General - The Associate Administrator or the State Agency that has submitted a current...	AT22-043	8/24/2022

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

On August 06, 2024, Pipeline Safety Staff conducted an inspection virtually via Team's meeting with the City of Andersonville Gas System and performed a follow-up inspection on the Operator's previously existing probable violations that were cited under AT22-043. An exit meeting was conducted on August 06, 2024.

During this inspection, the Operator was represented by:
Mark Hall – Public Works Superintendent
Bobby Boyd – City Services, Inc. (Consultant)

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

At the time of this inspection, the City of Andersonville had one (1) previously existing probable violation. During this inspection Staff determined the following.

PROBABLE VIOLATIONS CLEARED

In regard to the Notice of Amendment for the Probable Violation of 49CFR, §192.603(c) which was cited in Inspection Number AT22-043; in that inspection Staff identified six (6) observed deficiencies and stated:

1. The Operator must amend their procedures to include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting.
2. The Operator must amend their procedures to include instructions for personnel to detect leaks to help further reduce emission in stations and along the right of way.
3. The Operator must amend their procedures to define a process to identify, classify, mitigate and repair all leaks, not just hazardous leaks.
4. The Operator must amend their procedures to contain measures for identifying potential configuration changes that would reduce natural gas releases from regulators.
5. The Operator must amend their procedures to include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening.
6. The Operator must amend their procedures to clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114.

FIRST OPERATOR RESPONSE: In their revised response letter to Inspection number AT22-043, dated November 18, 2023, the City Andersonville stated:

1) Inspection Question #8 Leaks & Releases- The Operator has amended its methodology for collecting, retaining, and analyzation of detailed information from detected natural gas leaks per PSC guidance. These records can be found attached with this response letter.
2) Inspection Question #9 Leaks & Releases- The City has amended their O&M to include facilities in their patrolling activities. These facilities could include Regulator Stations, Rectifiers, Line Markers, etc. This information can be found attached along with this response letter.

3) Inspection Question #10 Leak Mitigation & Repair- The operator has amended its procedure to define a process in which ALL (hazardous and non-hazardous) leaks are identified, classified, and mitigated. This information is available attached along with this response letter.
4) Inspection Question #13 Regulator Stations Configuration- The operator has amended its O&M to include measures to identify any configuration changes that would reduce release of gas from regulators. This information is attached along with this response letter.
5) Inspection Question #18 Leak Prone: Leaks & Releases- The Operator has amended its methodology for collecting, retaining, and analyzation of detailed information from detected natural gas leaks per PSC guidance. These records can be found attached with this response letter.
6) Inspection Question #20- Leak Prone: Leak Mitigation & Repair-The City amended its O&M to clearly define and mitigate "leak prone" pipe. This definition and remediation information is attached along with this response letter.

FIRST FOLLOW-UP INSPECTION: On November 20, 2023, Staff reported to the City of Andersonville Gas System to perform a follow-up inspection of the Operator's continuing violations from Inspection Numbers AT22-043, AT22-044, and JH22-041. (Ref. Inspection Number AT23-041) In that inspection Staff stated" "During this inspection (AT23-041) Staff were unable to review the Operator's revised plan at this time as they are still currently making amendments. Staff determined that this probable violation could not be cleared at this time."

SECOND OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number AT23 -041.

SECOND FOLLOWUP INSPECTION: During this inspection (DC24-031), Staff reviewed the Operators response and the documents provided by the Operator and found that it adequately addresses this violation.

Staff determined that this violation 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.

OPERATOR RESPONSE FORM

Operator Name: City of Andersonville

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37022

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
☐ Warning Letter	☐ Yes ☐ No
☐ Letter of Concern	☐ Yes ☐ No
☐ Observed Issue	☐ Yes ☐ No
☐ Proposed Civil Penalty	☐ Yes ☐ No

$_____
Proposed Penalty for this violation

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:	)	
	)	
City of Andersonville Gas System	)	**DOCKET NO. 37022**
	)	
	)	
	)	

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 Velma Coley, Mayor Pro-Tem
City of Andersonville Gas System
P.O. Box 35
Andersonville, GA 31711
andersonville@bellsouth.net

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

Respectfully Submitted this 22nd day of April 2025:

Cathy Nesbitt

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