OPERATOR RESPONSE FORM

Operator Name: Town of Trion

FILED

APR 2 2 2025

EXECUTIVE SECRETARY

Informal Conference Requested: Yes No X

Docket Number: 37094

DOCKET# 37094
DOCUMENT# 222364

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

Response to Inspection Number: JB25-002

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) See form below

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

RECEIVED

APR 24 2025

Pipeline Safety Unit

OPERATOR RESPONSE FORM

Operator Name: Town of Trion

Informal Conference Requested: Yes No X

Docket Number: 37094

Enforcement Action for: 192.181(b) ☐ 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	$ 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: Due to contractor availability, material procurement challenges, and necessary permitting processes, we are requesting an extension until January 1, 2027 to ensure proper completion installing the remaining inlet valves.

Response Provided by: Mike Hughes / Gas Superintendent (Name / Title) Date: 3-24-25

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: Town of Trion

Informal Conference Requested: Yes No X

Docket Number: 37094

Enforcement Action for: §192.467(c) ☐ 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	$ 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: Due to contractor availability, material procurement challenges, and necessary permitting processes, we are requesting an extension until January 1, 2027, to ensure proper completion of the work.

Response Provided by: Mike Hughes / Gas Superintendent (Name / Title) Date: 3-24-25

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: Town of Trion

Informal Conference Requested: Yes No X

Docket Number: 37094

Enforcement Action for: §192.181(a) ☐ 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	$ 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 Town of Trion submits this final response regarding the probable violation of 49 CFR 192.181(a), as cited. As of 04-17-25, our Construction Manual has been formally amended to address the valve installation requirements outlined in 192.181. The attached procedure reflects this update and is the same version reviewed by Pipeline Safety Staff during the April 10, 2025, Pipeline Safety Seminar.

With these steps completed and the procedure previously reviewed, we believe this addresses the noted concern in full.

Response Provided by: Mike Hughes / Gas Superintendent (Name / Title) Date: 3-24-25

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: _____

Enforcement Action for: §192.747(b) ☐ New Violation ☒ Continuing Violation

OPERATOR RESPONSE FORM

Operator Name: Town of Trion

Informal Conference Requested: Yes No X

Docket Number: 37094

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	Drafting mitigation proposal email.
☐ Letter of Concern	☐ Yes ☐ No	
☐ Observed Issue	☐ Yes ☐ No	
☒ Proposed Civil Penalty	☒ Yes ☐ No	

OPERATORS RESPONSE: The two (2) valves in question were repaired and placed back in service on May 17, 2025.

Response Provided by: Mike Hughes / Gas Superintendent (Name / Title) Date: 3-24-25

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: Town of Trion

Informal Conference Requested: Yes No **X**

Docket Number: 37094

Enforcement Action for: §192.615(c) ☐ 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	$ 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: We have not yet received this report **JS24-022**

Response Provided by: Mike Hughes / Gas Superintendent (Name / Title) Date: 3-24-25

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: Town of Trion

Informal Conference Requested: Yes No **X**

Docket Number: 37094

Enforcement Action for: §192.616(c) ☐ 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	$ 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: We have not yet received this Inspection report. **JS24-022**

Response Provided by: Mike Hughes / Gas Superintendent
Name / Title

Date: 3-24-25

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.

High-density polyethylene (HDPE): All materials for new or replacement HDPE plastic mains and services shall be selected for a 125-psig MAOP, unless otherwise designated by the Town of Trion.

HDPE Pipe <u>Minimum</u> Specification:

- ½" CTS PE4710 SDR-N/A, 0.090 wall
- ½" IPS PE4710 SDR-9.33, 0.090 wall
- ¾" IPS PE4710 SDR-11, 0.095 wall
- 1" IPS PE4710 SDR-11, 0.119 wall
- 1 ¼" ISP PE4710 SDR-11, 0.151 wall
- 2" IPS PE4710 SDR-11, 0.216 wall
- 4" IPS PE4710 SDR-11, 0.409 wall
- 6" IPS PE4710 SDR-11, 0.602 wall

HDPE Fittings <u>Minimum</u> Specification:

- All fittings and valves shall be Category 1
- All fittings and valves shall be corrosion resistant
- All fittings and valves shall be rated for a minimum of 125 psig MAOP.

C. Distribution Line Valves (Ref. §192.181), (ADB-94-02)

i. Valves shall be designed and installed in all high-pressure distribution systems (systems operating over 7" W.C.) at locations that will reduce the time to shut down each section of the system in an emergency.

ii. When determining valve location and spacing to meet the requirements of §192.181, the Town of Trion shall utilize the guide material developed by the Gas Piping Technology Committee (GPTC). As noted in Advisory Bulletin ADB-94-02, to specifically define the requirement for location and number of emergency valves is not feasible because the location and number of valves is dependent on local conditions, and because local conditions vary greatly. When designing the location and spacing of valves, the Town of Trion shall consider the following:

   a. Physical Characteristics such as pipeline material, pipe size, etc.
   b. Size and characteristics of area to be isolated (such as wall to wall paving area).
   c. Topography features (such as rivers, major highways, and railroads).
   d. Number of valves necessary to isolate the area.
   e. Operating Characteristics such as operating pressure, pressure feeds, principal feeds into business districts, etc.

f. Number and type of customers such as business districts, high occupancy structures, hospitals, schools, and commercial and industrial users that would be affected
g. Time required for available personnel to arrive on scene and to carry out isolation procedures to stop the flow of gas.
h. Time required for controlling the pressure in the isolated areas by means of venting, transferring gas to adjacent systems, etc.
i. Time required for available personnel to restore service to customers.

iii. Each new regulator station controlling the flow or pressure of gas must have a valve installed on the inlet piping at a distance from the regulator station sufficient to permit the operation of the valve during an emergency that might preclude access to the station.

iv. Each new valve installed on a main must be placed in a readily accessible location with the operating stem or mechanism readily accessible so as to facilitate its operation in an emergency. Valves installed in a buried box or enclosure must be installed so that the box or enclosure does not transmit an external load to the pipeline. Additionally, measures should be taken to limit or reduce torsional loads and other pressures caused by the operation of the valve. This can be achieved through low-torque valves, protective sleeves, anchoring to prevent twisting, and transition pieces when connecting different materials.