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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 No. 37024

DOCKET# 37024
DOCUMENT# 222420

AGL - Operations and Engineering
Ten Peachtree Place, NE Suite 1000
Location 1365
Atlanta, GA 30309

REF: Comprehensive Inspection # DL24-012

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Pedro Cherry

On March 11, 2024, a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an inspection of your gas system. The enclosed inspection report numbered DL24-012 is provided for your information and file.

In conjunction with this inspection report, Staff has recommended the following enforcement(s):

Enforcement Action:

- ☒ Notice of Probable Violation
- ☐ Notice of Probable Violation with Proposed Civil Penalty
- ☐ Notice of Amendment

Enforcement Letter:

- ☐ Warning Letter
- ☒ Letter of Concern

Enforcement Notification:

- ☐ Observed Issue
- ☐ No Violation

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. 37024 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: DL24-012

OPERATOR: AGL - Brunswick

INVESTIGATOR: David Lewis

INSPECTION DATE: March 11, 2024 REPORT MAILED DATE: April 29, 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 comprehensive inspection of the Operators plans, programs, procedures, pipeline, and pipeline facilities for compliance with the minimum federal safety standards in 49CFR Parts 191 and 192.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.739	Pressure limiting and regulating stations: Inspection and testing.	JL18-027	6/4/2018

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
192.613	Continuing surveillance.	DL24-012	3/11/2024
192.614	Damage prevention program.	DL24-012	3/11/2024
192.603(b)	Each operator shall keep records necessary to administer the procedures established under §192.605.	DL24-012	3/11/2024
192.479(a)	Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the...	DL24-012	3/11/2024
192.481(a)	Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere...	DL24-012	3/11/2024

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

AGLC BRUNSWICK SERVICE CENTER/ COMPREHENSIVE INSPECTION
INSPECTION NUMBER DL24-012 / DOCKET NUMBER 37024

In February 2024 Staff provided questions to AGLC-Brunswick regarding the upcoming comprehensive inspection. During the periods of March 18, 2024, through March 27, 2024, Staff reported to the AGLC-Brunswick Service Center and reviewed AGLC Brunswick Service Center Operator's manuals, records, and field operations. Staff conducted the exit review on May 29, 2024.

During this inspection the Operator was represented by:
Ralph McCollum - Compliance Mgr.
Kaley Melton - Operations Manager
Tim Baker - Operations Manager
Greg Alexander - Corrosion Manager
Stephen Pevey - Supervisor System Operations
Brad Register - Corrosion Technician
Roger Jochum - Corrosion Technician
Shellie LaPradd - Corrosion Technician
Kevin Barnard - R-O-W Inspector
Mark Sosebee - Supervisor Asset Protection
Jesse Collins - SYSOP Specialist
Tim Connor - SYSOP

Commission Staff was represented by:
David Lewis - Lead Inspector
Jeff Bagett- Supervisor Pipeline Safety
Jack Hewitt – Pipeline Safety Inspector
Joe Jones – Pipeline Safety Inspector
Danial Clemons – Pipeline Safety Inspector
Brant Sweat – Pipeline Safety Inspector

At the time of this inspection Atlanta Gas Light Company Brunswick Service Center was under one (1) previously existing probable violation. Staff did not address this at this time.

During this inspection, Pipeline Safety Staff examined AGLC- Brunswick Service Center operations utilizing PHMSA Form 2 (Procedures / Records / Field Observations) to record the findings of the inspection.

Staff reviewed the AGLC- Brunswick Service Center's:
- O&M Manual
- Emergency Plan
- MAOP Procedures and records
- 5-year Patrolling & Leakage records
- 5- year Regulator & Relief Insp.
- 5- year Work orders
- 5- year Corrosion Surveys
- 5- year Atmospheric Corrosion records
- 5- year Odorization Records
- 5- year O.Q. Procedures and records
- 5- year Valve maintenance and records
- 5-year Annual 7100 Reports

As a result of this inspection Staff noted the following probable violations of the minimum federal safety standards.

NOTICE OF PROBABLE VIOLATION

1. CODE REQUIREMENT: 49CFR §192.614 - Damage prevention program.
   (c) The damage prevention program required by paragraph (a) of this section must, at a minimum:
   (5) Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.

   STAFFS COMMENTS: In Division II, Section 3.3.1(A) of their Operations and Procedural Manual (Marking for Regular Locate Requests) it states: "Within forty-eight (48) hours (beginning at 7:00 A.M. the next business day after the locate request has been received excluding Saturdays, Sundays or holidays), Atlanta Gas Light or its contractor shall locate any underground facilities in the area described on the locate ticket, or notify the excavator that there are no underground facilities in the area."

   During this inspection Staff determined that the Atlanta Gas Light Company Brunswick Service Center failed to identify and mark their facilities as required by their Operations and Procedural Manual on thirty-seven locate requests that were due between March 11 and March 19, 2024, that were responded to PRIS as 3N (Unmarked: Late). (example: 240301-001161). Staff has noted this probable violation on numerous inspection reports for the last five (5) Years.

   PROBABLE VIOLATION: Atlanta Gas Light Company Brunswick Service Center failed to follow their procedures required under §192.605(a) and their Operations and Procedural Manual for conducting their damage prevention program required under §192.614(c).

2. §192.603 General provisions
   (b) Each operator shall keep records necessary to administer the procedures established under §192.605.

   STAFFS COMMENTS: §192.727 requires operators to conduct abandonment or deactivation of pipelines in accordance with the requirements of this section. AGLC's procedure for Abandonment or Deactivation of Facilities is found in Division II, Section 9 of their OPM manual. These procedures refer to the "Procedure For Purging Pipelines – Activities For Purging of Gas With Air or Inert Gas For Abandonment" that are found in Division III, Section 8.10.5 of their OPM.

   During this inspection Staff reviewed work orders that did not document that the company followed the procedures for retiring a service. Staff noted that there was no documentation regarding the purging nor capping the ends of the pipe. (e.g. #64833274 at 36755 S. Okefenokee Dr. "Retire service")

   PROBABLE VIOLATION: Atlanta Gas Light Company - Brunswick Service Center failed to demonstrate that they complied with the procedures for the abandonment or deactivation of facilities under §192.727 and their OPM.

3. CODE REQUIREMENT: 49CFR, §192.613 Continuing Surveillance
   (a) Each operator shall have a procedure for continuing surveillance of its facilities to determine and take appropriate action concerning changes in class location, failures, leakage history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions.
   (b) If a segment of pipeline is determined to be in unsatisfactory condition but no immediate hazard exists, the operator shall initiate a program to recondition or phase out the segment involved, or, if

the segment cannot be reconditioned or phased out, reduce the maximum allowable operating pressure in accordance with §192.619 (a) and (b).

COMMENTS: In Division II, Section 6, Paragraph 6.1 of the AGLC Operations and Procedures Manual it states: "Whenever it is determined by means such as inspections, failures, leak history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions that a segment of pipeline or distribution facility is in unsafe or unsatisfactory condition, but no immediate hazard exists, the unsafe or unsatisfactory portion shall be scheduled for replacement or reconditioning within a reasonable length of time."

During this inspection (DL24-012) Staff found two (2) valves installed in pits at the intersection of Blythe Island Hwy. and Hwy 520. Neither of these were locked; one had a lid that was not attached and needed repair, and the valve was underwater. Staff also found five (5) valves in pits on Hwy 17 @ SCM Rd. that were not locked, some did not have lids and were filled with debris, trash, etc. The Operators patrolling records indicated that these deficiencies were identified on the April 3, 2023 pipeline patrol, however no remedial action had taken place at the time of this inspection.

PROBABLE VIOLATION: Atlanta Gas Light Company Brunswick service center failed to conduct remedial actions on identified issues during their continuing surveillance according to §192.613.

4. CODE REQUIREMENT: 49 CFR §192.479 Atmospheric corrosion control: General.
   (a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.

   STAFFS COMMENTS: The Operators' procedures for compliance with the requirements of §192.479 are found in Division II, Section 8, Item 8.22 of their Operations and Procedures Manuel.

   During this inspection (DL24-012) Staff found numerous locations throughout the Operator's system that had atmospheric corrosion including system piping at station adjacent to the Brunswick AGL Service Center, regulator station at Ocean Hwy and McKinnon, meter set for Symrise at 209 SCM Rd., property line regulator at 12015 Ocean Hwy.

   PROBABLE VIOLATION: Operator failed clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere as required under 49 CFR §192.479(a) and their Operator and Procedures Manual.

5. §192.481 Atmospheric corrosion control: Monitoring.
   (a) Each operator must inspect and evaluate each pipeline or portion of the pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:
      (2) Onshore Service Line - At least once every 5 calendar years, but with intervals not exceeding 63 months, except as provided in paragraph (d) of this section.

   STAFFS COMMENTS: The Operators procedures for atmospheric corrosion inspections is in Division II, Section 8, Item 8.23 of their Operations Procedures Manual. During this inspection Staff reviewed records provided by the Operator that indicated that multiple locations had not been inspected for atmospheric corrosion as required.

   PROBABLE VIOLATION: The Operator failed to demonstrate they have performed the inspection of all their facilities for atmospheric corrosion as required by §192.481 and their OPM procedures.

ITEM OF CONCERN

1) 49CFR §192.615 Emergency plans.
(b) Each operator shall:
(3) Review employee activities to determine whether the procedures were effectively followed in each emergency.

STAFF'S COMMENTS: In Division II, Section 22, Item 22.3.1 of the Operators OPM it states: "Each service center shall: 3. Review employee activities to determine whether the emergency procedures were effectively followed in each emergency."

During this inspection (DL24-012) Staff reviewed Work Orders and the process used to review work orders. Staff performed a sample review of the Operators' emergency response records on third party damages to its main pipelines involving Grade 1 leaks for calendar years 2018 to 2021. Staff found that the Operator had not documented that an emergency procedure review of their Field Service Associates (FSA's) activities had been performed to determine whether emergency procedures were effectively followed.

STAFFS CONCERN: The Operator was unable to demonstrate that a review of their employees (FSA's) activities are being performed as required under §192.615(b)(3) and their OPM procedures. Staff is also aware that this issue is being addressed separately with AGLC Corporate.

2. §192.481 Atmospheric corrosion control: Monitoring.
(a) Each operator must inspect and evaluate each pipeline or portion of the pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:
(2) Onshore Service Line - At least once every 5 calendar years, but with intervals not exceeding 63 months, except as provided in paragraph (d) of this section.

STAFFS COMMENTS: The Operators procedures for atmospheric corrosion inspections is in Division II, Section 8, Item 8.23 of their Operations Procedures Manual. During this inspection Staff reviewed records provided by the Operator that appeared to indicate that multiple locations had not been inspected for atmospheric corrosion as required. Prior to Staffs departure the Operator demonstrated that the records reviewed by Staff had not been properly queried in their system.

STAFFS CONCERN: The Operator experienced issues in demonstrating that they have performed the inspection of all their facilities for atmospheric corrosion as required by §192.481 and their OPM procedures.

OBSERVED ISSUE

1. §192.720 Distribution systems: Leak repair. (Records page 6 / Question 5)
Mechanical leak repair clamps installed after January 22, 2019 may not be used as a permanent repair method for plastic pipe.

STAFF COMMENTS: In Division III, Section 5, Item 5.21.1 of the AGLC OPM it states that: "Each imperfection or damage that impairs the serviceability of plastic pipe shall be removed. Temporary

repair of damaged plastic pipe may be accomplished using steel band clamps typically used to repair steel pipe. Do NOT enter an excavation in which plastic pipe is blowing gas. Permanent repair in accordance with Division III, Section "5.21.2 Plastic Pipe –Permanent Repair Methods" below, shall be made as soon as practical."

During this inspection Staff reviewed some work orders that indicated that mechanical clamps had been used for temporary leak repairs. Staff noted that some of these work orders did not have the clamps documented with date installed, location, and date of removal. (e.g. Work Order #64924101)

OBSERVED ISSUE: The Operators records failed to consistently demonstrate when mechanical leak repair clamps were removed and the pipeline was permanently repaired.

2. §192.743 Pressure limiting and regulating stations: Capacity of relief devices
   (a) Pressure relief devices at pressure limiting stations and pressure regulating stations must have sufficient capacity to protect the facilities to which they are connected. Except as provided in §192.739(b), the capacity must be consistent with the pressure limits of §192.201(a). This capacity must be determined at intervals not exceeding 15 months, but at least once each calendar year, by testing the devices in place or by review and calculations

   OBSERVED ISSUE: During this inspection Staff found several property line regulators with more than three services coming off of them which appear to be functioning as regulating stations, but which have not been identified as regulating stations.

During the field evaluation, Staff observed the Operator's personnel perform five (5) Protocol 9 field inspections. The Operator provided the individual qualifications to perform covered tasks. Staff examined the individual records before observing the performance in the field. Staff verified that qualification records for these individuals were current.

Jesse Emory, Pressure Control Specialist, performed:
-#OQ028A – Installing, Operating, Inspection and Testing Pressure Limiting Devices (Regulator Station), qualified 11/24/2021 through 12/31/2024.
-#OQ052A – Valve Inspection, qualified 10/18/2023 through 12/31/2028
-#OQ059A – Abnormal Operating Conditions, qualified 11/24/2021 through 12/31/2024

Tyler Bates :
Task #OQ041A – Odorization Sampling – Qualified Through 07/24/26
Task #OQ032A – Outside Leak Investigation – Qualified Through 02/05/27

Ricky Scott, AGL Lead Crewman Brunswick:
Task #OQ052A – Valve Inspection – Qualified 12/11/2020 Through 12/10/2025

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: ATLANTA GAS LIGHT COMPANY

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37024

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	$_____ 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: _____

_____

_____

_____

_____

_____

_____

_____

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:	)	
	)	
Atlanta Gas Light Company	)	**DOCKET NO. 37024**
	)	
	)	
	)	

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

* Walt Farrell, President and CEO
Southern Company Gas
Ten Peachtree Place, NE,
Atlanta, GA 30309
wffarell@southernco.com

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

Respectfully Submitted this 5th day of May 2025:

Cathy Nesbitt

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