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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. 37094

DOCKET# 37094
DOCUMENT# 222434

Town of Trion Gas Department
PO Box 850
1220 Pine St
Trion, GA 30753

REF: Follow Up Inspection # JS24-021

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Lanny Thomas

On June 10, 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 JS24-021 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. 37094 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: JS24-021

OPERATOR: Town of Trion Gas Department

INVESTIGATOR: Jason Smith

INSPECTION DATE: June 10, 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 follow-up inspection of the Operator's previously existing probable violations.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.181(b)	Each regulator station controlling the flow or pressure of gas in a distribution system must have...	JJ22-051	11/7/2022
192.467(c)	Except for unprotected copper inserted in a ferrous pipe, each pipeline must be electrically...	JJ22-051	11/7/2022
192.181(a)	Each high-pressure distribution system must have valves spaced so as to reduce the time to...	JJ22-051	11/7/2022

3. CLEARED VIOLATIONS

Cleared on 6/10/2024

Violation	Description	Inspection#	Date
192.747(b)	Each operator must take prompt remedial action to correct any valve found inoperable, unless the...	JJ22-051	11/7/2022
192.615(a)(6)	Emergency shutdown and pressure reduction in any section of the operator's pipeline system neces...	JJ22-051	11/7/2022

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	JS24-021	6/10/2024

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

TOWN OF TRION GAS DEPARTMENT / FOLLOW-UP INSPECTION
INSPECTION NUMBER JS24-021 / DOCKET NUMBER 37094

On June 10 & 11 2024, Staff reported to the Town of Trion to perform a follow-up inspection on the gas department's previously existing probable violations.

During this inspection the Operator was represented by:
Mike Hughes - Gas Superintendent
Maurice Chaney - MGAG/SRCS (consultant)

Pipeline Safety Staff was represented by:
Jason Smith - Lead Inspector
Joe Jones - Pipeline Safety Inspector

At the time of this inspection the Trion Gas Department was under five (5) previously existing probable violations. Staff reviewed these probable violations with Operator and determined that:

PROBABLE VIOLATION CLEARED

In regard to §192.747(b), which was cited under inspection #JJ22-051, in that report Staff stated: The Town of Trion failed to take prompt remedial action to correct their valves that were found inoperable during their annual maintenance for CY2017 and 2018, or to designate an alternative valve.

OPERATOR RESPONSE: In their response letter to Inspection Number JJ22-051, dated February 14, 2023, the Operator stated: The Town of Trion has temporarily removed valves 26-2 and 26-3 from its critical valve list and has designated an alternate valve (PP-4) to replace them while repairs are being made. These two (2) valves will be repaired and placed back in service by June 30, 2023.

All other valves will be rechecked for operability and will be serviced and/or repaired by the end of year 2023.

FOLLOW-UP: Staff reported to Trion on August 15, 2023, to perform a drug & alcohol inspection under inspection #RS23-015. Since this inspection was conducted with the Designated Employer Representative and not actual gas department personnel Staff did not perform a follow-up on the Operator's previously existing probable violations.

OPERATOR RESPONSE: In their response letter to Inspection Number RS23-015, dated March 8, 2024, the Operator stated: The Town of Trion previously removed valves 26-2 and 26-3 from its critical valve list and designated an alternate valve (PP-4) to replace them while repairs were being made. Valves 26-2 and 26-3 have been repaired and returned to service; and placed back on the critical valve list.

FOLLOW-UP INSPECTION: During this inspection (#JS24-021) Staff confirmed that both valves #26-2 and #26-3 have been placed back into service, and returned to the critical valve list.

Staff determined that this probable violation can be cleared at this time.

2. In regard to the §192.615(a)(6) Notice of Amendment, which was cited under inspection #JJ22-051, in that report Staff stated: The Operator was unable to provide a process in their emergency plan for how, when or where an emergency shutdown would take place in any section of their system. Also, the

Operators emergency valves listed in their emergency plan do not identify which valve or valves shuts off a particular pipeline section in the event of an emergency.

REQUIRED AMENDMENT: The Town of Trion must amend their procedures to ensure they can take necessary actions to perform emergency shutdowns, valve shut-off, or pressure reductions, in any section of their pipeline system, to minimize hazards of released gas to life, property, or the environment.

OPERATOR RESPONSE: In their response letter to Inspection Number JJ22-051, dated February 14, 2023, the Operator stated: The Town of Trion will create a new map of its system and will plot valves on this map to better determine needed spacing of valves and the section they control. Completion is expected by end of year 2023.

FOLLOW-UP: Staff reported to Trion on August 15, 2023, to perform a drug & alcohol inspection under inspection #RS23-015. Since this inspection was conducted with the Designated Employer Representative and not actual gas department personnel, Staff did not perform a follow-up on the Operator's previously existing probable violations.

OPERATOR RESPONSE: In their response letter to Inspection Number RS23-015, dated March 8, 2024, the Operator stated: The Town of Trion has created a map of its system and has plotted valves on this map to better determine spacing of valves and the sections they control.

FOLLOW-UP INSPECTION: During this inspection (#JS24-021) Staff reviewed the Trion's Emergency Manual section V 'Emergency Shut-Down and Pressure Reduction'
Under section #4, it states that appendix K of this plan contains a listing of emergency valves that may be utilized for emergency shutdown or pressure reduction or this appendix shall denote the location of where the listing of emergency valves can be located.
Under section #7, it states to aid in Emergency Shutdown, Trion maintains the following information:

a. A listing of Emergency Valve Locations – See Appendix K
b. Maps or Other Records that May be Used to Identify Sections of the System that will be Affected by the Operation of Each Emergency Valve or Other Shutdown Device

Trion Gas Department has a map of the system with the valves plotted and color coded to illustrate what section it controls.

Staff determined that this probable violation can be cleared at this time.

PROBABLE VIOLATION CONTINUING

1. In regard to §192.181(b), which was cited under inspection #JJ22-051, in that report Staff stated: During field inspection, Staff observed that at some locations (Thomas Road / Tate Rd / Town Border / Mountain View / Clements Heights / Gate Station / Colefield) the Operator does not have inlet valves at a reasonable distance from all of their pressure reducing stations and regulator stations so as to gain control of an emergency situation such as a fire, when the station cannot be approached or accessed.

PROBABLE VIOLATION: The Operator does not have a valve installed on the inlet piping at a distance from each regulator station sufficient to permit the operation of the valve during an emergency.

OPERATOR RESPONSE: In their response letter to Inspection Number JJ22-051, dated February 14, 2023, the Operator stated: The Town of Trion has surveyed its regulator stations and found that nine (9) need to have valves farther away from the station. The Town of Trion will work with contractors to develop a plan for correcting this issue. Installation of the nine inlet valves is expected to be completed by December 31, 2024.

FOLLOW-UP: Staff reported to Trion on August 15, 2023, to perform a drug & alcohol inspection under inspection #RS23-015. Since this inspection was conducted with the Designated Employer Representative and not actual gas department personnel Staff did not perform a follow-up on the Operator's previously existing probable violations.

OPERATOR RESPONSE: In their response letter to Inspection Number RS23-015, dated March 8, 2024, the Operator stated: The Town of Trion has surveyed its regulator stations and found that nine (9) need to have valves farther away from the station. The Town of Trion will work with a contractor to develop a plan for correcting this issue. The plan will be complete by August 1, 2024, after which an installation schedule will be developed.

FOLLOW-UP INSPECTION: During this inspection (#JS24-021) the Operator informed Staff that they are working on the time frame mentioned in the previous response letters for the installation of the inlet valves.

Staff determined that this violation could not be cleared at this time.

2. In regard to §192.467(c), which was cited under inspection #JJ22-051, in that report Staff stated: Staff reviewed records which indicated that the Operator has not achieved electrical isolation at three of their casings. Staff also performed field inspections to verify that these casing were shorted. These location were identified as:

1. Old Hwy 27 @ Airport Rd – Shorted casing (2017-2022)
2. Ridgeway Road at railroad – Shorted casing (2017-2022)
3. Mount Vernon at railroad – Shorted casing (2017-2022)

PROBABLE VIOLATION: The Operator failed to ensure that each of their pipelines is electrically isolated from metallic casings that are a part of the underground system.

OPERATOR RESPONSE: In their response letter to Inspection Number JJ22-051, dated February 14, 2023, the Operator stated: The Town of Trion (Trion) has three (3) shorted casings. One (1) of these casings is under a county road. Trion will excavate it to see if the short can be cleared or if it will be necessary to re-bore the roadway. This one should be completed by September 1, 2023.

The other two (2) casings are under a railroad. Trion will need permits from the Railroad before these casings can be excavated to assess the possibility of repair. Trion is working with a contractor to develop a plan for assessing these casings followed by repair or replacement. A schedule will be prepared after railroad permits are received.

FOLLOW-UP: Staff reported to Trion on August 15, 2023, to perform a drug & alcohol inspection under inspection #RS23-015. Since this inspection was conducted with the Designated Employer Representative and not actual gas department personnel Staff did not perform a follow-up on the Operator's previously existing probable violations.

OPERATOR RESPONSE: In their response letter to Inspection Number RS23-015, dated March 8, 2024, the Operator stated: The Town of Trion (Trion) has three (3) shorted casings. One (1) of these casings is under a county road. Trion has determined that the short cannot be cleared and that it will be necessary to re-bore the roadway. Trion is currently working with a contractor to develop a plan for replacing this crossing. The other two (2) casings are under a railroad. Trion will need permits from the Railroad before these casings can be excavated to assess the possibility of repair. Trion is working with a contractor to develop a plan for assessing these casings followed by repair or replacement. A schedule will be prepared after railroad permits are received.

FOLLOW-UP INSPECTION: During this inspection (#JS24-021) the Operator informed Staff that they are still working trying to obtain permits from the county and railroad. There is no time frame on completion as of this inspection.

Staff determined that this violation could not be cleared at this time.

3. In regard to the §192.181(a) Notice of Amendment, which was cited under comp. inspection #JJ22-051, in that report Staff stated: The Town of Trion must amend their procedures to address the placement of distribution line valves for their system.

OPERATOR RESPONSE: In their response letter to Inspection Number JJ22-051, dated February 14, 2023, the Operator stated: The Town of Trion has implemented a Construction Manual that includes provisions for the placement of valves in newly constructed distribution lines.

FOLLOW-UP: Staff reported to Trion on August 15, 2023, to perform a drug & alcohol inspection under inspection #RS23-015. Since this inspection was conducted with the Designated Employer Representative and not actual gas department personnel Staff did not perform a follow-up on the Operator's previously existing probable violations.

OPERATOR RESPONSE: In their response letter to Inspection Number RS23-015, dated March 8, 2024, the Town of Trion stated: The Town of Trion has implemented a Construction Manual that includes provisions for the placement of valves in newly constructed distribution lines.

FOLLOW-UP INSPECTION: During this inspection (#JS24-021) the Operator informed Staff that they are still working on the wording for the guidance criteria they currently have in section E of their Construction Manual, to develop a valve placement procedure.

Staff determined that this violation could not 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

Informal Conference Requested: Yes ☐ No ☐

Operator Name: Town of Trion Gas Department

Docket Number: 37094

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	Proposed Penalty for this violation
☐ 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:	)	
	)	
Town of Trion Gas Department	)	**DOCKET NO. 37094**
	)	
	)	
	)	

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 Lanny Thomas, Mayor
Town of Trion Gas Department
P.O. Box 850
1220 Pine Street
Trion, GA 30753
lthomas@townoftrion.net

*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