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Georgia Public Service Commission

(404) 463-6526
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244 Washington Street, SW
Atlanta, GA 30334-5701

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

Docket No. 37055

DOCKET# 37055
DOCUMENT# 223260

City of Grantville Gas System
123 LaGrange Street P. O. Box 160
Grantville, GA 30220

ATTN: Mr. Al Grieshaber

On July 23, 2024 a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an on-site inspection of your gas system and found no violation of the Pipeline Safety Regulations. The enclosed inspection report numbered RS24-022 is provided for your information and file.

If you have any questions or comments concerning this report, please contact me at (404) 985-4271 or mthebert@psc.ga.gov. If you submit a written response to this inspection, please refer to Docket No. 37055.

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: RS24-022

OPERATOR: City of Grantville Gas System

INVESTIGATOR: Brant Sweat

INSPECTION DATE: July 23, 2024 REPORT MAILED DATE: March 5, 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

Violation	Description	Inspection#	Date
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	AT22-006	2/3/2022
192.615(a)(4)	The availability of personnel, equipment, tools, and materials, as needed at the scene of an...	AT22-006	2/3/2022
Under Consent Agreement	Operator is under a Consent Agreement.	JS23-024	8/28/2023

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

On July 25, 2024, Pipeline Safety Staff reported to the City of Grantville Gas System and performed a follow-up inspection on the Operator's previously existing probable violations.

The Operator was represented by:
Alex Boyd - Gas System Supervisor
Joan Henry - Utility Coordinator
Gene Taylor - MGAG/SRCS (consultant)

Commission Staff was represented by:
Brant Sweat - Lead Inspector
Eric Atkins - Pipeline Safety Inspector

At the time of this inspection the City of Grantville Gas System was under two (2) previously existing probable violations. These violations are addressed in Inspection Number JS23-024. This report addresses the Consent Agreement items from Inspection Number LB13-022, DL14-025, and JL15-054. Staff reviewed these items with the Operator and determined that:

PROBABLE VIOLATION CLEARED

In regard to the Notice of Amendment for §192.605(a) for the deficiency of §192.615(a)(8) which was cited under Inspection Number AT22-006; in that inspection Staff stated: "The City of Grantville must amend their procedures to ensure that they are notifying appropriate fire, police, and other public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency."

OPERATOR FIRST RESPONSE: In their response letter to Inspection Number AT22-006, dated July 28, 2022, the City of Grantville stated: "Grantville is currently evaluating its options for redundant communication methods that could be employed to maintain communications with emergency response personnel in the event its primary communication method(s) fail. Options being considered include access to the Grantville Police Department radio system and dedicated two-way radios. A secondary communication method will be implemented by October 30, 2022."

FIRST FOLLOW-UP INSPECTION: On August 4, 2022, Staff reported to the City of Grantville Gas Department to perform an inspection of the Operator's methane emission reduction plan for their distribution facilities for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number JB22-018) In that inspection Staff stated: "At the time of this inspection the City of Grantville had seven previously existing probable violations. Staff did not review these items during this inspection."

OPERATOR SECOND RESPONSE: In their response letter to Inspection Number JB22-018, dated July 14, 2022, the City of Grantville stated: "Grantville has established a secondary communications method by means of the Grantville Police Department radio system."

SECOND FOLLOW-UP INSPECTION: On August 28, 2023, Pipeline Safety Staff reported the City of Grantville Gas System and performed a follow-up inspection on the Operator's previously existing probable violations that were cited under comprehensive inspection #AT22-006. (Ref. Inspection Number JS23-024) In that inspection Staff stated:

"On August 28, 2023, Staff reported to the City of Grantville and followed up with the Operator on their existing probable violations. In regard to §192.615(a)(8) the Operator showed Staff that they now have access to police department two-way radios in the event of their primary communication methods fail.

The Operator also provided the following:

Section II 'Establish and Maintaining Communication with Appropriate Public Officials' which states Grantville has identified location(s) to serve as the Emergency Operations Command Center. In establishing the Emergency Operations Command Center Grantville considered the need for the following: Two-Way Radios, if applicable, complete with the applicable codes/frequencies (e.g. Push-to-Talk Radios, etc.).

Appendix C-2 'Government Organization Resources' list the Grantville Police Department being available for traffic control and their methods of communications include Two-Way Communication (i.e, Central Dispatch)

Appendix D 'Grantville Emergency Operations Command Center Location and Communication Methods' states Emergency Operations Command Centers are equipped /setup with some, or all, of the following: #3. Fixed Radio Communications, and #4. Mobile Radio Communications – Push-to-Talk.

Appendix F-5 'Natural Disasters'

Staff observed that the emergency plan fails to address the two-way radio being an option if land line and cell phone service is not available, and when the Operator will opt to use the two-way radios.

Staff determined that Notice of Amendment has not been addressed."

OPERATORS THIRD RESPONSE: In their response to Inspection Number JS23-024, dated May 13, 2024, the City of Grantville stated: "In Grantville's Emergency Plan, Appendix F states that in the event of a natural disaster Grantville will establish an Emergency Operations Command Center. Appendix D describes the Emergency Operations Command Center location and communication methods, including the use of two-way radios. Grantville will use all available communications methods when and as necessary to coordinate and provide emergency response."

THIRD FOLLOW-UP INSPECTION: On November 29, 2023, Pipeline Safety Staff reported to the City of Grantville Gas System and performed a follow-up inspection on the Operator's previously existing probable violations. (Ref. Inspection Number DC23-037) In that inspection Staff stated: " At the time of this inspection the City of Grantville Gas System was under three (3) previously existing probable violations. These violations are addressed in Inspection Number JS23-024."

OPERATOR FOURTH RESPONSE: In their response to inspection #DC23-037, dated March 5, 2024, the Operator stated: Grantville has established a secondary communication method by means of the Grantville Police Department radio system.

FOURTH FOLLOW-UP INSPECTION: During this inspection (Inspection Number RS24-022) the City of Grantville Gas showed staff in their Emergency Response Plan that it addresses the two-way radio

being an option if land line and cell phone service is not available, and when the Operator will opt to use the two-way radios.

Staff determined that this violation could be cleared.

PROBABLE VIOLATION CONTINUING

1. In regard to the probable violation of §192.615(a)(4) which was cited under Inspection Number AT22-006; in that inspection Staff stated: "The City of Grantville has failed to establish a process which will ensure the availability of personnel, equipment, tools, and materials, as needed at the scene of an emergency."

   OPERATOR FIRST RESPONSE: In their response letter to Inspection Number AT22-006, dated July 28, 2022, the City of Grantville stated: "Grantville has reviewed and revised its process for designating an on-call person and for advising Coweta County 911 of the appropriate persons to contact in case of a natural gas emergency. Grantville also now ensures that its on-call person has ready access to the combustible gas indicator."

   FIRST FOLLOW-UP INSPECTION: On August 4, 2022, Staff reported to the City of Grantville Gas Department to perform an inspection of the Operator's methane emission reduction plan for their distribution facilities for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number JB22-018) In that inspection Staff stated: "At the time of this inspection the City of Grantville had seven previously existing probable violations. Staff did not review these items during this inspection."

   OPERATORS SECOND RESPONSE: In their response letter to Inspection Number JB22-018, dated July 14, 2022, the City of Grantville stated: "Grantville has reviewed and revised its process for designating an on-call person and for advising Coweta County 911 of the appropriate persons to contact in case of a natural gas emergency. Grantville also now ensures that its on-call person has ready access to the combustible gas indicator."

   SECOND FOLLOW-UP INSPECTION: On August 28, 2023, Pipeline Safety Staff reported the City of Grantville Gas System and performed a follow-up inspection on the Operator's previously existing probable violations that were cited under comprehensive inspection #AT22-006. (Ref. Inspection Number JS23-024) In that inspection Staff stated:

   > "On August 28, 2023, Staff reported to the City of Grantville and followed up with the Operator on their existing probable violations (ref. Inspection Number JS23-024). In that report Staff stated: The Gas System Supervisor also informed Staff that the combustible gas detector is no longer kept in his vehicle when he's off duty but left at the Gas System office, so it is accessible to other gas personnel if necessary. In regard to §192.615(a)(4) the Operator showed Staff they updated their Plan for Natural Gas Emergencies; appendix C-3 'City of Grantville Emergency Contact List'. Staff determined that the City of Grantville Gas System has not fully addressed this violation.
   >
   > Staff observed that the document provided by the Operator no longer requires the reader to start at the top of a list and call the first person "at 5-minute intervals for a maximum of two tries" before moving on to the next person on the list; however, while this

document list the employees who can be contacted, it does not specify any actual time frames that any particular employee is required to be on call. Staff expressed their concern to the Operator that their process for ensuring the availability of personnel under §192.615(a)(4) did not appear to meet the requirements under §192.615(a)(3) to provide a prompt and effective response to a notice of each type of emergency."

OPERATORS THIRD RESPONSE: In their response to Inspection Number JS23-024, dated May 13, 2024, the City of Grantville stated: "Grantville's Emergency Plan includes Appendix A-2 – City of Grantville Emergency On-Call List that is kept current and provided to affected individuals and parties to ensure that the requirements of 192.614(a)(3) are met."

THIRD FOLLOW-UP INSPECTION: On November 29, 2023, Pipeline Safety Staff reported to the City of Grantville Gas System and performed a follow-up inspection on the Operator's previously existing probable violations. (Ref. Inspection Number DC23-037) In that inspection Staff stated: "At the time of this inspection the City of Grantville Gas System was under three (3) previously existing probable violations. These violations are addressed in Inspection Number JS23-024."

OPERATOR FOURTH RESPONSE: In their response to Inspection Number DC23-037, dated March 5, 2024, the Operator stated: "Grantville has reviewed and revised its process for designating an on-call person and for advising Coweta County 911 of the appropriate persons to contact in case of a natural gas emergency. Grantville also now ensures that its on-call person has ready access to the combustible gas indicator."

FOURTH FOLLOW-UP INSPECTION: During this inspection (Inspection Number RS24-022) Staff found that the City of Grantville still had an On-Call list that only had Alex Boyd at the top to call first every time. Then the others that were on the list every five minutes until someone was reached. Staff determined that the Operator has failed to address this probable violation.

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

2. In regard to the Notice of Amendment for §192.605(a) for the deficiency of §192.181(a) which was cited under Inspection Number AT22-006; in that inspection Staff stated: "The City of Grantville must amend their procedures to address the placement of distribution line valves for their system."

   OPERATOR FIRST RESPONSE: In their response letter to Inspection Number AT22-006, dated July 28, 2022, the City of Grantville stated: "Grantville is aware that GPSC Staff is preparing a Notice of Proposed Rulemaking that will include requirements related to valve placement. Upon final approval of this Proposed Rule, the new requirements will be incorporated into Grantville's manuals, plans, and procedures, as appropriate."

   FIRST FOLLOW-UP INSPECTION: On August 4, 2022, Staff reported to the City of Grantville Gas Department to perform an inspection of the Operator's methane emission reduction plan for their distribution facilities for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number JB22-018) In that inspection Staff stated: "At the time of this inspection the City of Grantville had seven previously existing probable violations. Staff did not review these items during this inspection."

OPERATOR SECOND RESPONSE: In their response letter to Inspection Number JB22-018, dated July 14, 2022, the City of Grantville stated: "Grantville is aware that GPSC Staff is preparing a Notice of Proposed Rulemaking that will include requirements related to valve placement. Upon final approval of this Proposed Rule, the new requirements will be incorporated into Grantville's manuals, plans, and procedures, as appropriate."

SECOND FOLLOW-UP INSPECTION: On August 28, 2023, Pipeline Safety Staff reported the City of Grantville Gas System and performed a follow-up inspection on the Operator's previously existing probable violations that were cited under comprehensive inspection #AT22-006. (Ref. Inspection Number JS23-024) In that inspection Staff stated:

> "On August 28, 2023, Staff reported to the City of Grantville and followed up with the Operator on their existing probable violations. In regard to §192.181(a) the City of Grantville Gas System provided Staff with section E of their Construction Manual which is titled 'Distribution Line Valves (Ref. §192.181)". This section discusses what to consider when designating the spacing of valves. Staff determined that it does not address the issue brought up during the comprehensive inspection. Currently Section E of their construction manual is merely Guidance Material. The Operator has not developed a specific process on how distribution line valves are placed in their system (Note/Example: Grantville should have a document that considers attributes of their pipeline such as size, operating pressure, location, and number of customers to be affected). Staff determined that Notice of Amendment has not been addressed."

OPERATORS THIRD RESPONSE: In their response to Inspection Number JS23-024, dated May 13, 2024, the City of Grantville stated: "Grantville requests an Informal Conference with the Director to discuss this Notice of Amendment."

THIRD FOLLOW-UP INSPECTION: On November 29, 2023, Pipeline Safety Staff reported to the City of Grantville Gas System and performed a follow-up inspection on the Operator's previously existing probable violations. (Ref. Inspection Number DC23-037) In that inspection Staff stated: " At the time of this inspection the City of Grantville Gas System was under three (3) previously existing probable violations. These violations are addressed in Inspection Number JS23-024."

OPERATOR FOURTH RESPONSE: In their response to Inspection Number DC23-037, dated March 5, 2024, the Operator stated: "Grantville has implemented a construction manual that includes provisions for placement of critical valves in newly constructed distribution mains."

FOURTH FOLLOW-UP INSPECTION: During this inspection (Inspection Number RS24-022) Staff found that the City of Grantville's Construction Manual did not address the issue brought up during the comprehensive inspection. Currently Section E of their construction manual is merely Guidance Material. The Operator has not developed a specific process on how distribution line valves are placed in their system

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

CONSENT AGREEMENT CONTINUING

On December 11, 2019 the Commission approved a Consent Agreement with the City of Grantville for issues delineated in Inspection Numbers LB13-022, DL14-015 and JL15-054. During this inspection Staff reviewed the Operators progress in complying with the terms of this agreement.

1. Consent Agreement Item 1) - Grantville shall send two employees to the Georgia Pipeline Safety Seminar in Macon beginning in 2020 for the next three (3) years at an estimated cost of $1,700 per year.

   During this inspection (Inspection Number RS24-022) Staff found that the City of Grantville could not send any employees to the Seminar in the years 2020 and 2021 due to COVID-19 virus and the cancellation of the seminar in 2020 and 2021. Grantville has since been to the Pipeline Safety Seminar in 2022 and 2023 and will attend in 2024 to make it three consecutive years.

   Staff determined that this item has not been addressed.

2. Consent Agreement Item 2) - Grantville shall send one employee to the Drug and Alcohol class offered by Staff during the next three Pipeline Safety Seminars beginning in 2020 at an estimated cost of $450.

   During this inspection (Inspection Number RS24-022) Staff found that the City of Grantville could not send any employees to the Drug and Alcohol class offered by Staff during the Pipeline Safety Seminar in years 2020 and 2021 due to COVID-19 virus and the cancellation of the seminar in years 2020 and 2021. Operator has been two consecutive years to the Drug and Alcohol class offered by Staff.

   Staff determined that this item has **not** been addressed.

3. Consent Item 3) - Grantville shall become a member of the Georgia Pipeline Emergency Responders Initiative ("GPERI") for a period of three (3) years at a cost of$825. The projected completion date is June 30, 2023.

   During this inspection (Inspection Number RS24-022) Staff found that the City of Grantville provided documentation which demonstrated that they participated as a member of the GPERI program for CY's 2021 to 2023.

   Staff determined that this item has been addressed.

4. Consent Agreement Item 4) - Grantville shall participate in the Georgia 811 RP1162 Statewide Excavator Awareness Program for a period of three (3) years at a cost of $75.00. The projected completion date of December 31, 2023.

   During this inspection (Inspection Number RS24-022) Staff found that the City of Grantville provided documentation which demonstrated that they participated as a member of the Georgia 811 RP1162 for CY's 2021 and 2022; however, they could not produce a receipt for CY2023.

   Staff determined that this item has not been addressed.

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 Grantville

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37055

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:	)	
	)	
City of Grantville Gas System	)	**DOCKET NO. 37055**
	)	
	)	
	)	

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

*Al Grieshaber, City Manager
City of Grantville Gas System
123 LaGrange Street
P.O. Box 160
Grantville, GA 30220
agrieshaber@grantvillega.org

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

Respectfully Submitted this 7th day of July 2025:

Cathy Nesbitt

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