OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No X

Operator Name: City of Grantville

Docket Number: 37055

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

Response to Inspection Number: RS24-022

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: Not Applicable
   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
   The City of Grantville acknowledges receipt of the No Violation Letter for this Report.

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No X

Operator Name: City of Grantville

Docket Number: 37055

Enforcement Action for: §192.615(a)(4) ☐ 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 City of Grantville has reviewed and updated its process for designating on-call personnel and for advising Coweta County 911 of the appropriate contacts in the event of a natural gas emergency. This process is documented in Appendix A-2 of Grantville's Emergency Plan. Grantville has designated two individuals as the sole contacts for all gas emergencies. These individuals do not rotate or change on a weekly or monthly basis; they are permanently assigned and are the only contacts that 911 is required to notify at all times. The previous process, which required 911 to call the first person on the list at 5-minute intervals for up to two attempts before proceeding to the next contact, has been discontinued. The revised process now instructs 911 to alternate calls between the two designated City of Grantville contacts until successful contact is made. A copy of the updated process has been attached for review.

Response Provided by: Joan Henry, Asst. Dir. Public Works & Utilities (Name / Title) Date: 07/22/2025

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: City of Grantville

Informal Conference Requested: Yes ☐ No X

Docket Number: 37055

Enforcement Action for: §192.605(a)/§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	$
☒ 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: The City of Grantville submits this updated response regarding the probable violation of 49 CFR 192.181, as cited in Inspection Number AT22-006 that was conducted on February 3, 2022. As of April 15, 2025, our Construction Manual has been 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 on April 10, 2025, at the Pipeline Safety Seminar in Macon. With these steps completed and the procedure previously reviewed, we believe this addresses the noted concern in full. The City of Grantville respectfully requests that this violation be cleared.

Response Provided by: Joan Henry, Asst. Dir. Public Works & Utilities Date: 07/22/2025

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: _____

City of Grantville Gas Call Notification Process

1. **Initial Call Handling:**
   All gas-related calls for the City of Grantville are handled by Coweta County 911.
2. **Emergency Response:**
   If the call requires emergency assistance, Coweta County Emergency Responders will be dispatched immediately.
3. **City Notification Sequence:**
   Upon receiving a gas call, the 911 Operator will notify City of Grantville personnel in the following order:
   - First Call: Attempt to contact Alex Boyd at 706-977-7081.
   - If No Answer: Call Joan Henry at 678-877-7964.
   - If Joan Cannot Be Reached: The 911 Operator will then:
     - Attempt to reach Alex Boyd again.
4. **Repeated Contact Attempts:**
   The 911 Operator will continue alternating calls between Alex Boyd and Joan Henry until contact 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 City of Grantville.

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 City of Grantville 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 City of Grantville 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.

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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.

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