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(404) 463-6526
(800) 282-5813

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Atlanta, GA 30334-5701

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

Docket No. 37082

DOCKET# 37082
DOCUMENT# 225799

City of Sparta Gas System
P. O. Box H
Sparta, GA 31087

REF: DIMP – Implementation Inspection # JS25-021

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Allen Haywood

On June 18, 2025, a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an inspection of your gas system. The enclosed inspection report numbered JS25-021 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. 37082 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

COMMISSIONERS

JASON SHAW , Chairman
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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: JS25-021

OPERATOR: City of Sparta Gas System

INVESTIGATOR: Jason Smith

INSPECTION DATE: June 18, 2025 REPORT MAILED DATE: March 11, 2026

Any questions concerning this report may be directed to the above address or by telephoning (404) 463-6526.

1. PURPOSE OF INSPECTION

To conduct an inspection of the Operator's implementation of their Distribution Integrity Management Program (DIMP) for compliance with the minimum federal standards in 49CFR Part 192, SubPart P.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
199.101	Anti-Drug Plan	JJ20-014	3/10/2020
192.147	Flanges and flange accessories.	JS20-042	11/16/2020
192.479(a)	Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the...	JS20-042	11/16/2020
192.615(a)(2)	Each operator shall establish written procedures to minimize the hazard resulting from a...	JS20-042	11/16/2020

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
192.1007(d)	Identify and implement measures to address risks.	JS25-021	6/18/2025
192.1007(f)	Periodic Evaluation and Improvement.	JS25-021	6/18/2025
192.1011	What records must an operator keep?	JS25-021	6/18/2025
192.1007(e)	Measure performance, monitor results, and evaluate effectiveness.	JS25-021	6/18/2025

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

On June 18, 2025, Pipeline Safety Staff began reviewing the Sparta Natural Gas System's annual 7100 reports, Operator Dashboard information from the PHMSA portal page, and their Distribution Integrity Management Plan (version 4.1). On July 8, 2025, Staff reported to the City of Sparta to perform a DIMP Implementation inspection.

During this inspection, the Operator was represented by:
Bobby Gunter - Gas Superintendent
Amanda Akins - Utility Director
Peter Schultz - Harp and Associates (consultant)

Commission Staff was represented by:
Jason Smith - Lead Inspector
Glen Murphy- Pipeline Safety Inspector

At the time of this inspection the City of Sparta Natural Gas System was under six (6) previously existing probable violations. These violations are addressed under Follow-up Inspection Number JS25-011.

NOTICE OF PROBABLE VIOLATION

As a result of this inspection, Staff found that the City of Sparta Natural Gas System was in probable violation of the minimum federal safety standards; specifically:

1. 49CFR §192.1007 - What are the required elements of an integrity management plan?
   A written integrity management plan must contain procedures for developing and implementing the following elements:
   (d) Identify and implement measures to address risks. Determine and implement measures designed to reduce the risks from failure of its gas distribution pipeline. These measures must include an effective leak management program (unless all leaks are repaired when found).

   STAFFS COMMENTS: PHMSA Gas Distribution System DIMP Implementation inspection form Question #22. Measures to Reduce Risk - Leak Management, states: Can the operator provide documentation to demonstrate that an effective leak management program is being implemented?

   - Under section 6.1 'Mandatory Additional Actions' of Sparta's DIMP, it states: when discovered, Grade 2 leaks should be repaired or cleared within one calendar year, but no later than 15 months from the date the leak was reported. These leaks should be reevaluated at least once every six months until cleared. The frequency of reevaluation should be determined by the location and magnitude of the leakage condition.

   - A grade 2 underground leak was discovered at 8812 East Broad Street on August 31, 2021, during the south residential section leak survey. Staff asked the Operator to see documentation/work orders regarding the repair or how this leak was ultimately cleared. The Operator could not provide the documentation/work order. The next time the south residential section was leak surveyed in 2024 no leak was found at the location.

   PROBABLE VIOLATION: The City of Sparta Natural Gas System could not demonstrate they followed the procedures for Grade 2 leaks, of their DIMP leak management program.

2. 49CFR §192.1007 - What are the required elements of an integrity management plan?
   (e) Measure performance, monitor results, and evaluate effectiveness.
   (1) Develop and monitor performance measures from an established baseline to evaluate the effectiveness of its IM program. An operator must consider the results of its performance monitoring in periodically re-evaluating the threats and risks. These performance measures must include the following:
   (i) Number of hazardous leaks either eliminated or repaired as required by § 192.703(c) of this subchapter (or total number of leaks if all leaks are repaired when found), categorized by cause;
   (ii) Number of excavation damages;
   (iii) Number of excavation tickets (receipt of information by the underground facility operator from the notification center);
   (iv) Total number of leaks either eliminated or repaired, categorized by cause;
   (v) Number of hazardous leaks either eliminated or repaired as required by § 192.703(c) (or total number of leaks if all leaks are repaired when found), categorized by material; and
   (vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the operator's IM program in controlling each identified threat.

   STAFFS COMMENTS: PHMSA Gas Distribution System DIMP Implementation inspection form Question #24. Measure Performance - Implementation (DIMP) states: Based on field observations and/or record reviews, is the data used to measure performance being accurately collected in accordance with the procedures in its DIMP plan?

   Prior to the inspection, Pipeline Safety Staff found emergency locate ticket request called-in by Sparta Natural Gas. Staff asked the Operator if they could provide documentation/work orders for:
   1) A gas service repair that took place on 6/9/2022 at 9532 Jones Street under ticket #220609-001461.
   2) A gas service repair that occurred on 11/29/2022 at 280 Gordon Street under ticket #221129-002677.
   3) A gas main repair that occurred on Hamilton Street, near Jones St on 7/26/2023 under ticket #230726-002326.

   The Operator was unable to provide any documentation/work orders for the two gas service line repairs that occurred in 2022.

   PROBABLE VIOLATION: The City of Sparta Natural Gas System failed to demonstrate they are collecting data that they use for performance monitoring of their DIMP.

3. 49CFR §192.1007 - What are the required elements of an integrity management plan?
   (f) Periodic Evaluation and Improvement. An operator must re-evaluate threats and risks on its entire pipeline and consider the relevance of threats in one location to other areas. Each operator must determine the appropriate period for conducting complete program evaluations based on the complexity of its system and changes in factors affecting the risk of failure. An operator must conduct a complete program re-evaluation at least every five years. The operator must consider the results of the performance monitoring in these evaluations.

   STAFFS COMMENTS: PHMSA Gas Distribution System DIMP Implementation inspection form Question #27. Periodic Evaluation - Implementation (Frequency) states: Have periodic evaluations of the DIMP plan been performed on the frequency specified in the plan?

- Chapter 3 'Knowledge of the Distribution System' of Sparta's DIMP version 2014-01-17; states this plan will be reviewed at least every 3 years to continually refine and improve this Plan. Reviews may be performed more frequently as described in Chapter 8, Periodic Evaluation and Improvement of this Plan.
- Chapter 8 states, Sparta Natural Gas will conduct a complete re-evaluation of this Plan no less than every 3 years.
- The Operator's next DIMP version was 2019-05-19.

Staff asked the Operator if they may have forgotten about one done sometime before the end of 2017, but they did not.

PROBABLE VIOLATION: The City of Sparta Natural Gas System failed to follow their written procedure for conducting a re-evaluation of their DIMP at least every 3 years.

4. 49CFR §192.1011 - What records must an operator keep?
An operator must maintain records demonstrating compliance with the requirements of this subpart for at least 10 years. The records must include copies of superseded integrity management plans developed under this subpart.

   a) PHMSA Gas Distribution System DIMP Implementation inspection form
   Question #34. Records – Implementation states: Are records retained demonstrating compliance with Subpart P, as specified in its DIMP plan, for 10 years (or since 08/02/2011)?

   STAFFS COMMENTS:
   - Chapter 10 'Record Keeping' of Sparta's DIMP version 4.1 (2023-03-14) states, records will be maintained for ten years; including: records of data required to be collected to calculate performance measures, data sources referenced during the threat assessments, and inspection, maintenance and other records relied upon in developing this written DIMP plan.

   - Section 7.2 'Risk Based Performance Measures' states for all seven threats; the relative risk posed by this threat on this section of City of Sparta Natural Gas are adequately addressed by current inspection and maintenance. No additional actions are required.

   Staff asked the Operator if they could provide documentation/work orders for:
   1) A gas service repair that took place on 6/9/2022 at 9532 Jones Street under ticket #220609-001461
   2) A gas service repair that occurred on 11/29/2022 at 280 Gordon Street under ticket #221129-002677
   3) A gas main repair that occurred on Hamilton Street, near Jones St on 7/26/2023 under ticket #230726-002326

   The Operator was unable to provide any documentation for the two gas service line repairs that occurred in 2022.

   DEFICIENCY: Sparta Natural Gas failed to maintain records demonstrating compliance with the requirements of Subpart P for at least 10 years.

b) PHMSA Gas Distribution System DIMP Implementation inspection form question #36. Records - Implementation (DIMP) states: Were DIMP procedures followed as applicable to records retention?

STAFFS COMMENTS: Chapter 10 'Record Keeping' of Sparta's DIMP version 4.1 (2023-03-14) states records will be maintained for ten years, including:

- records of data required to be collected to calculate performance measures listed in Chapter 7 'Measure Performance, Monitor Results And Evaluate Effectiveness'
- data sources referenced during the threat assessment (in section 11.3 'List Of Data Sources From SHRIMP™ Interviews),
- records of mechanical fitting failures, and
- inspection / maintenance and other records relied upon in developing the written DIMP

Staff asked the Operator for documentation/work orders for two gas service repairs that took place in 2022. The Operator could not produce these work orders and had issues presenting other work orders from 2021 through 2023.

DEFICIENCY: Sparta Natural Gas System failed to follow their procedures for maintaining their inspection/maintenance records for a period of 10 years

PROBABLE VIOLATION: The City of Sparta Natural Gas System failed to maintain records demonstrating compliance with the requirements of this subpart for at least 10 years

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 Sparta Gas System

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 39082

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 Sparta Gas System	)	**DOCKET NO. 37082**
	)	
	)	
	)	

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 Allen Haywood, Mayor
City of Sparta Gas System
P.O. Box H
Sparta, GA 31087
allensusan6@bellsouth.net

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

Respectfully Submitted this _____ day of March 2026:

Cathy Nesbitt

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