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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. 37030

DOCKET# 37030
DOCUMENT# 226318

City of Cairo Gas System
119 North Broad St
Cairo, GA 39828

REF: Follow Up Inspection # CW25-048

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Booker T. Gainor, IV

On October 29, 2025, 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 CW25-048 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. 37030 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: CW25-048

OPERATOR: City of Cairo Gas System

INVESTIGATOR: Chuck Whitaker

INSPECTION DATE: October 29, 2025 REPORT MAILED DATE: April 20, 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 a follow-up inspection of the Operators previously existing probable violations.

2. CONTINUING VIOLATIONS

3. CLEARED VIOLATIONS

Cleared on 10/29/2025

Violation	Description	Inspection#	Date
192.463(a)	Each cathodic protection system required by this subpart must provide a level of cathodic...	RS24-018	4/22/2024

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

On November 3, 2025, Staff reported to the City of Cairo Gas System to perform a follow-up inspection on the gas department's previously existing probable violations. An exit interview was held on November 6, 2025.

During this inspection the Operator was represented by:
Robbie Hutchinson – Gas Superintendent
Sam Yarley – SRCS Consultant

Commission Staff were represented by:
Chuck Whitaker - Lead Pipeline Safety Inspector
Joseph Jones – Pipeline Safety Inspector

At the time of this inspection the City of Cairo Gas System was under one (1) previously existing probable violation. Staff reviewed this probable violation with Operator and determined that:

PROBABLE VIOLATION CLEARED

In regard to the probable violation of §192.463(a) which was cited in Inspection Number RS24-018; in that inspection Staff stated:

> *"In their Operations and Maintenance Procedures Manual the City of Cairo defines their CP criteria as "-850 mv with the cathodic protection applied is required", and states that: "A negative (cathodic) potential of at least 850 mv with the cathodic protection applied is required. This potential is measured with respect to a saturated copper/copper sulfate reference electrode contacting the electrolyte. Voltage drops (IR) other than those across the structure-to-electrolyte boundary must be considered for valid interpretation of this potential measurement."*
>
> *During this inspection Staff reviewed the Operators CP monitoring records from 2019 through 2023. These records failed to demonstrate that the Operator provided a level of Cathodic protection that complies with one or more of the applicable criteria contained in appendix D of 49CFR, Part 192. Specifically, the Operators records failed to demonstrate that voltage (IR) drops other than those across the structure electrolyte boundary had been considered for valid interpretation of the voltage measurement in 49CFR, Appendix D, Section I, paragraph A(1).*
>
> *PROBABLE VIOLATION: The City of Cairo failed to demonstrate that their CP system is providing the level of cathodic protection required by §192.463(a) and their O&M procedures."*

OPERATOR RESPONSE: In their response to Inspection Number RS24-018 dated July 21, 2025, the Operator stated:

> *"The City of Cairo provides the following response to the Notice of Probable Violation of 192.463(a) cited in Inspection Number RS24-018 conducted on April 22, 2024. The City of Cairo completed its cathodic protection on and off readings on in May 2024, June 2025, and attaches the records for review."*

FIRST FOLLOW-UP: During this inspection Staff reviewed the Operators completed cathodic protection on and off readings for May 2024 and June 2025.

Staff determined that this violation could be cleared at this time.

ITEM OF CONCERN

§192.465 External corrosion control: Monitoring and remediation.
(a) Each pipeline that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of §192.463. However, if tests at those intervals are impractical for separately protected short sections of mains or transmission lines, not in excess of 100 feet (30 meters), or separately protected service lines, these pipelines may be surveyed on a sampling basis. At least 10 percent of these protected structures, distributed over the entire system must be surveyed each calendar year, with a different 10 percent checked each subsequent year, so that the entire system is tested in each 10-year period.

STAFFS CONCERN: While Staff has recommended clearing the probable violation of §192.463(a) cited in Inspection Number RS24-018, the City of Cairo Gas System's response falls short of addressing the root cause or the intent of the regulatory requirements. Although the Operator submitted cathodic protection readings that now demonstrate compliance with its testing procedures, there is no evidence that the Operator has examined how this prolonged failure—lasting five years—was allowed to occur. Equally concerning, the response does not outline any corrective actions or process improvements to prevent a recurrence. This lack of proactive measures raises serious doubts about the Operator's commitment to sustained compliance and pipeline safety.

As the Operator is undoubtedly aware, on September 28, 2010, a corrosion-related failure on a 2-inch steel pipeline at 4th Avenue NW and 4th Street NW in the City of Cairo resulted in a fire that tragically claimed one life and left three employees with severe burn injuries.

Given this history, it is deeply troubling that the City of Cairo would allow a five-year period to pass without properly monitoring and validating the effectiveness of its cathodic protection system. This lapse demonstrates a disregard for lessons learned and calls into question the Operator's dedication to pipeline integrity and public safety.

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 Cairo

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37030

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 Cairo Gas System	)	**DOCKET NO. 37030**
	)	
	)	
	)	

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

*Booker T. Gainor, IV, City Manager
City of Cairo Gas System
119 North Broad St
Cairo, GA 39828
bgainor@cairocity.net

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

Respectfully Submitted this 23rd day of April 2026:

Cathy Nesbitt

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