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JUL 3 0 2026
EXECUTIVE SECRETARY
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DOCKET# 37086
DOCUMENT# 227412

Docket No. 37086

City of Sylvania Gas Department
104 South Main Street
Sylvania, GA 30467

REF: Follow Up Inspection # JS26-013

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Stacy Mathis

On May 18, 2026, 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 JS26-013 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. 37086 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: JS26-013

OPERATOR: City of Sylvania Gas Department

INVESTIGATOR: Jason Smith

INSPECTION DATE: May 18, 2026 REPORT MAILED DATE: July 30, 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 Operator's previously existing probable violations.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	JJ20-030	6/9/2020
192.807(b)	Records supporting an individual's current qualification shall be maintained while the individual...	JS25-001	1/21/2025
192.1007(c)	Evaluate and rank risk.	JS26-007	2/2/2026
192.1007(f)	Periodic Evaluation and Improvement.	JS26-007	2/2/2026
192.1007(b)	Identify threats. The operator must consider the following categories of threats to each gas...	JS26-007	2/2/2026
192.1007(f)	Periodic Evaluation and Improvement.	JS26-008	2/2/2026
199.101	Anti-Drug Plan	JS26-009	2/19/2026
199.105(c)(7)	Each operator shall ensure that random drug tests conducted under this subpart are unannounced and..	JS26-009	2/19/2026
199.101(a)(1)	Methods and procedures for compliance with all the requirements of this part, including the...	JS26-009	2/19/2026
192.463(a)	Each cathodic protection system required by this subpart must provide a level of cathodic…	JS26-014	5/6/2026
192.619(a)	No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum...	JS26-014	5/6/2026
192.723(a)	Each operator of a distribution system shall conduct periodic leakage surveys in accordance with...	JS26-014	5/6/2026

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

On May 18, 2026, Staff reported to the City of Sylvania Gas System to perform a follow-up inspection of the Operator's previously existing probable violations.

During this inspection, the Operator was represented by:
Michael Phillips - Gas Superintendent
Noah Rosier - Gas Tech
Chris Cawley - MGAG/SRCS (consultant)

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

At the time of this inspection, the City of Sylvania Gas System was under one previously existing probable violation and waiting for a consent agreement to be sent to them. Staff reviewed the probable violation with the Operator and determined that:

PROBABLE VIOLATION CONTINUING

In regard to the previously existing probable of violation of 49CFR §192.807(b) which was cited in Inspection Number JS25-001; in that report Staff stated:

> "On PHMSA's OQ Plan Review Inspection form, question #11 asks: Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?
>
> Staff needed to verify that the Operator had records of prior qualifications of individuals no longer performing covered tasks, and they are retained for a period of five years. Sylvania Gas System utilizes Qualification Keeper to maintain their OQ records. Staff requested that the Operator demonstrate prior qualifications and records of Roy Burke, a Gas Tech who left the Operator in the summer (August) of 2023. The Operator was not able to access records for Roy Burke on the Qualification Keeper database. The Operator then began searching through their office for hard copies of his qualification records. While they were able to locate a few records (task evaluation checklist), Sylvania Gas System was not able to demonstrate they retained all of Roy Burks' prior qualification records for five years.
>
> PROBABLE VIOLATION: Sylvania Gas System failed to maintain records of prior qualification and records of individuals no longer performing covered tasks for a period of five years as required by 192.807(b)."

FIRST FOLLOW-UP: On February 9-11, 2026, Staff reported to the City of Sylvania Gas Department to perform DIMP and DIMP Implementation inspections (ref. #JS26-007 and #JS26-008). Then on February 25 & 26, 2026, Staff reported back to the City of Sylvania to perform an inspection on their drug & alcohol program (ref. #JS26-009). At the time of these inspections, the Operator had not yet received a copy of the existing notice of probable violation, so they had not had the opportunity to submit a written response. Staff chose not to perform a follow-up inspection at this time.

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number JS25-001, dated April 23, 2026, the Operator stated: "City of Sylvania located OQ Records for Roy Burke. Records are available for review."

FOLLOW-UP: During this inspection, JS26-013; the City of Sylvania Gas System provided Staff with some 'Task Evaluation Checklist' for Roy Burke from the past. They included:

10 records from 2018 including:
Task #0101 - Inspect Rectifier & Obtain Readings; which was done 11/20/2018. (re-eval. period 5 years)
Task #0151 - Visual Inspection of Buried Pipe & Components When Exposed; which was done 8/06/2018. (re-eval. period 3 years)
Task #0301 - Manually Opening & Closing Valves; which was done - not legible (re-eval. period 3 years)
Task #0301-B - Opening & Closing Service Valves; which was done 8/06/2018 (re-eval. period 3 years)
Task #0901 - Installation of PE Pipe in a Ditch; which was done 8/06/2018. (re-eval. period 3 years)
Task #1011 - External Coating Application & Repair – Wrapped; which was done 11/19/2018. (re-eval. period 3 years)
Task #1141 - Squeeze Off PE Pipe; which was done 11/15/2018. (re-eval. period 3 years)
Task #1161 - Install Customer Meter & Regulator – Residential & Commercial; was done 8/06/2018. (re-eval. period 3 years)
Task #1231 - Inside Gas Leak Investigation; which was done 11/14/2018. (re-eval. period 3 years)
Task #1241 - Outside Gas Leak Investigation; which was done 11/14/2018. (re-eval. period 3 years)

10 records from 2019 including:
Task #0101 - Inspect Rectifier & Obtain Readings; which was done 11/20/2019. (re-eval. period 5 years)
Task #0141 - Inspect For Atmospheric Corrosion; which was done 11/20/2019. (re-eval. period 5 years)
Task #0681 - Joining of Plastic Pipe – Stab Fittings; which was done 3/15/2019. (re-eval. period 1 year)
Task #0691- 0701 - Joining of Plastic – Non-Bottom Out & Bottom Out Compression Couplings; which was done 3/15/2019. (re-eval. period 1 year)
Task #0711 - Joining of Plastic – Compression Couplings; which was done 3/15/2019. (re-eval. period 1 year)
Task #0751- 0761 - Joining of Plastic – Butt Heat Fusion: Manual & Hydraulic Machine; which was done 3/15/2019. (re-eval. period 1 year)
Task #0781 - Joining of Plastic – Electrofusion; which was done 3/15/2019. (re-eval. period 1 year)
Task #0791 - Joining of Plastic Socket Heat Fusion; which was done 3/15/2019. (re-eval. period 1 year)
Task #1211 - Odorization Sampling; which was done 11/1/2019. (re-eval. period 5 years)
Task #1291 - Locating; which was done 6/12/2019. (re-eval. period 1 year)

5 records from 2020 including:
Task #0151 - Visual Inspection of Buried Pipe & Components When Exposed; which was done 3/16/2020. (re-eval. period 3 years)
Task #0901 - Installation of PE Pipe in a Ditch; which was done 3/16/2020. (re-eval. period 3 years)
Task #0941 - Installation of Tracer Wire; which was done 3/16/2020. (re-eval. period 3 years)
Task #0981 - Backfilling; which was done 3/16/2020. (re-eval. period 3 years)
Task #1291 - Locating; which was done 6/16/2020. (re-eval. period 1 year)

2 records from 2021 including:
Task #0941 - Installation of Tracer Wire; which was done 6/14/2021. (re-eval. period 3 years)
Task #1291 - Locating; which was done 7/08/2021. (re-eval. period 1 year)

2 records from 2022 including:

Task #0681 Joining Plastic – Stab Fittings; which was done 7/07/2022. (re-eval. period 1 year)
Task #1291 - Locating; which was done 7/13/2022. (re-eval. period 1 year)

The Operator informed Staff that at the time of this follow-up inspection, they did not have access to Roy Burke's records online through the OQ Keeper database and were having some difficulties retrieving them ('Workers Covered Task Qualification Record' history spreadsheet). The Gas Superintendent informed Staff that to his best recollection, Roy Burke left the City of Sylvania Gas System in the winter of 2023.

Staff notes that no records were provided for calendar year 2023.

Based on the records the Operator was able to present to Staff, it appears Roy Burke may have been qualified for the following task up until his departing from the gas system.
Task #0101 - Inspect Rectifier & Obtain Readings
Task #0141 - Inspect For Atmospheric Corrosion
Task #1211 - Odorization - Periodic Sampling;
Task #0941 - Installation of Tracer Wire
Task #0681 Joining Plastic – Stab Fittings & #1291 – Locating would have expired in 7/2023

Staff determined that the records provided by the Operator failed to demonstrate compliance with the requirements under §192.807(b). Additionally, the response filed by the Operator fails to indicate that they took corrective measures to achieve compliance, or to include a written plan of action outlining the corrective measures that will be taken to achieve compliance and when compliance is anticipated, as required under CR 515-9-3.-09.

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

FOLLOW-UP ON CONSENT AGREEMENT PENDING

During this inspection, Staff found that on May 5, 2026, the City of Sylvania City Manager sent an e-mail to the Pipeline Safety Director stating she agrees with the terms of the consent agreement draft and asked for a final version to be prepared for execution.

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 Sylvania

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37086

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 Sylvania Gas Department	)	**DOCKET NO. 37086**
	)	
	)	
	)	

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

*Stacy Mathis, City Manager
City of Sylvania Gas Department
104 South Main Street
Sylvania, GA 30467
csyv@planters.net

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

Respectfully Submitted this 3rd day of August 2026:

Cathy Nesbitt

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