

CITY OF WARNER ROBINS

GEORGIA'S INTERNATIONAL CITY - CHARTERED 1943
"A CITY OF CHARACTER"

MAYOR

Randy Toms

MEMBERS OF COUNCIL

Post 1

Chuck Shaheen

Post 2

Carolyn Robbins

Post 3

Keith Lauritsen

Post 4

Tim Thomas

Post 5

Clifford Holmes, Jr.

Post 6

Mike Davis

CITY CLERK

William G. Harte

CITY ATTORNEY

James E. Elliott, Jr.

17 December 2018

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street
Atlanta, GA 30334

RE: Docket No. 37098
Inspection No. JL18-015

Dear Mr. McAlister:

The City of Warner Robins ("Warner Robins") respectfully files this response to the Report on Inspection No. JL18-015 that was filed on October 16, 2018, in Docket No. 37098, in accordance with the *Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC's Pipeline Safety Director* that was attached to the Report.

Enclosed herewith are five (5) copies of this response, as well as a CD containing an electronic version of the response.

NOTICE OF PROBABLE VIOLATION

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

49CFR §192.907(a)...

OBSERVED DEFICIENCY: Staff found that the Operator's Integrity Management plan identifies "internal corrosion" as a threat and to date has not conducted any assessments for the threat.

PROBABLE VIOLATION: Based on the observed deficiencies indicated in this report, Staff determined that

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the Operator has failed to develop and follow a written integrity management program that contains all the elements described in § 192.911 and that addresses the risks on each covered transmission pipeline segment.”

RESPONSE

In accordance with sections IA1 and IIA2 of the *Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC's Pipeline Safety Director*, Warner Robins does not contest the violation alleged or request an informal conference to discuss this NOPV and files the following written plan of action outlining the corrective measures that will be taken to achieve compliance and when compliance is anticipated:

Assessment will begin on 07 Jan 2019 and be completed on 01 June 2019 by a C.P. Contractor/engineering firm the city has selected.

NOTICE OF AMENDMENT

“As a result of this inspection Staff found that the City of Warner Robins was in probable violation of the minimum federal safety standards, specifically:

49CFR §192.907(a)...

PROBABLE VIOLATION: Based on the observed deficiencies indicated in this report, Staff determined that the Operator has failed to develop and follow a written integrity management program that contains all the elements described in § 192.911 and that addresses the risks on each covered transmission pipeline segment.”

RESPONSE

In accordance with sections IA2 and IIC1 of the *Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications*

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Issued by the GPSC's Pipeline Safety Director, Warner Robins does not contest the Notice of Amendment (NOA) and files the measures taken and plans to address the observed deficiencies identified in the NOA as follows:

Warner Robins is currently amending its IMP to address the Observed Deficiencies cited in this Inspection Report and will be completed by 01 June 2019. The City of Warner Robins is currently using a C.P. private contractor for investigating the system and providing advice for improvements.

CONTINUING PROBABLE VIOLATION

In accordance with section IID of the *Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC's Pipeline Safety Director* that was included with this Report, Warner Robins provides the current status, updates, expected completion dates, and proposed modifications, if any, of the Continuing and/or existing Violation(s) that were not cleared as a result of the current Inspection.

192.905(a) as cited in Inspection #JL17-032

STATUS

Warner Robins is revising its IMP to address the issues cited in the referenced Inspection Report. The revisions will begin on 07 January 2019 and will be completed by 01 June 2019.

192.905(b)(1) as cited in Inspection #JL17-032

STATUS

Warner Robins has communicated with public officials in determining Identified Sites.

191.17(a) as cited in Inspection #JL17-032

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STATUS

Warner Robins has submitted a Supplemental 7100.2-1 Report to address the discrepancy noted in the referenced Inspection Report.

Please let us know if you have any questions or need additional information.

Sincerely,
CITY OF WARNER ROBINS

Mayor Randy Toms

Signed: 

cc: Michelle Thebert, GPSC
Rob Pace, SRCS