FILED
NOV 10 2022
EXECUTIVE SECRETARY
G.P.S.C.

COMMISSIONERS
TRICIA PRIDEMORE , Chairman
TIM G. ECHOLS , Vice-Chairman
FITZ JOHNSON
LAUREN "BUBBA" McDONALD
JASON SHAW

REECE McALISTER
EXECUTIVE DIRECTOR

MICHELLE THEBERT
FACILITIES PROTECTION UNIT DIRECTOR

# Georgia Public Service Commission

FILED
JAN 11 2023
EXECUTIVE SECRETARY
G.P.S.C.

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

244 Washington Street, SW
Atlanta, GA 30334-5701

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

Docket No. 44734

DOCKET# 44734
DOCUMENT# 192679

The Woods of Savannah Apartment Complex
C/O Gene B. Glick Co.
8801 River Crossing Boulevard
Suite 200
Indianapolis, 46240

REF: Methane Emission Plan Inspection # JJ22-044

☐ Certified Mail ☑ Regular Mail ☐ Email

Attention: Mr. Tommy Jennings

On August 29, 2022, a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an inspection of your gas system. The enclosed inspection report numbered JJ22-044 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. 44734 in your response.

Please let me know if there are any questions concerning this report at (404) 463-6526 or michellet@psc.state.ga.us. Thank you for your continuing contribution toward increased pipeline safety.

Sincerely,

*Michelle Thebert*

Michelle L. Thebert
Director, Office of Pipeline Safety/Facilities Protection

# OPERATOR RESPONSE FORM

Operator Name: Woods of Savannah

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 44734

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

Response to Inspection Number: JJ22-044

| 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: 60108(a)(2) & 192.603(c) ☒ 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:

During the inspection conducted by the Georgia Commission the Woods of Savannah did In fact have a Section 114 plan in place. Gene B Glick is contracted with Utility Safety and Design who handles all manual requirements. USDI completed the manuals for the property before the December 27th deadline. However, due to turnover the new staff was unaware of how to obtain a copy of the emissions plans. USDI spoke directly with Joe on the matter and it was understood that all matters were resolved upon completion of the conversation. If you wish to see a copy of the 114 plan please reach out to mmartin@usdi.us for a copy.

Response Provided by: Michael Martin / Operations Manager (Name / Title) Date: 12/2/2022

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: _____