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MICHELLE THEBERT
FACILITIES PROTECTION UNIT DIRECTOR

Georgia Public Service Commission

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Docket No. 37098

DOCKET# 37098
DOCUMENT# 219965

City of Warner Robins Gas System
PO Box 8629
Warner Robins, GA 31095

REF: DIMP – Implementation Inspection # DJ24-006

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Ms. LaRhonda W. Patrick

On January 22, 2024, a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an inspection of your gas system. The enclosed inspection report numbered DJ24-006 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. 37098 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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Director, Office of Pipeline Safety/Facilities Protection

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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: DJ24-006

OPERATOR: City of Warner Robins Gas System

INVESTIGATOR: Daphne Jones

INSPECTION DATE: January 22, 2024 REPORT MAILED DATE: September 17, 2024

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 Operators 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
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	JL17-031	9/18/2017
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	LB20-016	4/16/2020
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	KR21-001	11/9/2020
192.181(b)	Each regulator station controlling the flow or pressure of gas in a distribution system must have...	KR21-001	11/9/2020
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	KR21-016	5/18/2021
40.25	Must an employer check on the drug and alcohol testing record of employees it is intending to use...	JS21-026	8/18/2021
199.105(a)	Pre-employment Testing	JS21-026	8/18/2021

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

From January 22-23, 2024, Staff reported to the City of Warner Robins's Gas Department to perform an inspection of the Operator's Distribution Integrity Management Plan (DIMP) Implementation and Protocol 9 inspections for compliance with the minimum federal safety standards. The exit meeting was held on January 23, 2024.

During this inspection the Operator was represented by:
Josh Lairsey – Compliance Manager, ESG
Robbie Miller - Regional Gas Manager, ESG
Billy Meeks - Gas Superintendent, ESG
Wade Sharpe – MGAG/SRCS (Consultant)

Commission Staff was represented by:
Daphne Jones – Lead Inspector
Daniel Clemmons – Pipeline Safety Inspector

At the time of this inspection the City of Warner Robins's Gas System was under five (5) previously existing probable violation. These violations will be addressed in a separate follow-up inspection under Inspection Number JB24-001.

NO VIOLATIONS FOUND

During this inspection, Staff examined the Operator's Distribution Integrity Management Plan version 6.1.1 with an effective date of 7/07/2022. Staff reviewed the Operator's DIMP procedures and all related records to verify compliance with Minimum Federal Safety Regulations. Staff reviewed the City of Warner Robins Gas Department's identified threats, accelerated actions, baseline measures, and performance measures for the Operator's Distribution Integrity Management Program's current version and preceding versions.

During this inspection, Staff reviewed the Operator's Annual 7100 reports for 2013 through 2022 which indicated that no new facilities were installed during this period. Staff verified that the Operator has documented the following on their work orders: • Location • Material type and size • Wall thickness or SDR • Manufacturer • Lot or production number.

During this inspection, Staff conducted three Operator Qualification Protocol 9 field verification inspections to ensure that covered task(s) were being performed in accordance with appropriate operator-approved procedures, that the procedures were present at the job site, and that the individuals performing the observed covered task(s) were adhering to the operator-approved procedures as written.

Peter Bubb, Crew Leader, performed:
- Task #381– Spring-Load and Pilot-Operated Pressure Regulating, Limiting, and Relief Devices: Inspection, Testing, Preventative and Corrective Maintenance, qualified 2/8/2022 thru 2/8/2025
Adam Windham, Crew Leader, performed:
- Task #0111– Maintain Rectifier, qualified 5/6/2022 thru 5/6/2025
Amado Lazaro, Gas Service Technician, performed:
- Task #1241 – Outside Gas Leak Investigation, qualified 10/6/2021 thru 10/6/2024

Staff verified that the individual was able to perform the covered tasks according to the procedures and was able to identify generic and task specific abnormal conditions and define the applicable actions.

LETTER OF CONCERN

§192.614 Damage prevention program
(a) Except as provided in paragraphs (d) and (e) of this section, each operator of a buried pipeline must carry out, in accordance with this section, a written program to prevent damage to that pipeline from excavation activities. For the purposes of this section, the term "excavation activities" includes excavation, blasting, boring, tunneling, backfilling, the removal of aboveground structures by either explosive or mechanical means, and other earthmoving operations.

STAFF'S CONCERN: During this inspection, Staff reviewed numerous records concerning excavation damages for CY 2019, 2020, 2021, and 2022. Staff noticed that in CY2022 Warner Robins had a moderate spike in excavation damages due to locating practices not sufficient. The City of Warner Robins stated that the slight trend upward was resulting from facilities not located or marked incorrectly. Although the City of Warner Robins may have followed the procedures detailed in their Distribution Integrity Management Program (DIMP); the number of excavation damages are trending upwards and the chosen mitigative measures appear to not be addressing the reduction of the damages. Staff have a concern that if the City of Warner Robins does not adequately determine a way to reduce the number of damages due to locating practices not sufficient, the opportunity and likelihood of an event increases dramatically.

As a result of this inspection, Staff noted no probable violations of the minimum federal safety standards.

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.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

IN THE MATTER OF:	)	
	)	
DIMP-Implementation Inspection	)	**DOCKET NO. 37098**
City of Warner Robins Gas System	)	
Inspection DJ24-006 on January 22, 2024	)	
	)	

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that I have caused to be served a copy of the foregoing, and a copy of same was served upon all parties and persons listed below via electronic mail as indicated by an asterisk I further certify that the *City of Warner Robins Gas System* was served a hard copy of the above-stated document by U.S. Mail, certified/return receipt requested.

*Sallie Tanner, Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334

*The Honorable LaRhonda W. Patrick, Mayor
City of Warner Robins Gas System
P.O. Box 8629
Warner Robins, GA 31093
lpatrick@wrga.gov

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

Respectfully Submitted this 24th day of September 2024:

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