COMMISSIONERS

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

FILED
MAY 01 2025
EXECUTIVE SECRETARY
GPSC

REECE McALISTER
EXECUTIVE DIRECTOR

MICHELLE THEBERT
FACILITIES PROTECTION UNIT DIRECTOR

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. 37095

DOCKET# 37095
DOCUMENT# 222432

City of Unadilla Gas System
PO Box 307
Unadilla, GA 31091

REF: Follow Up Inspection # DC24-008

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Myron Mixon

On January 24, 2024, 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 DC24-008 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. 37095 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

COMMISSIONERS

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

REECE McALISTER
EXECUTIVE DIRECTOR

MICHELLE THEBERT
FACILITIES PROTECTION UNIT DIRECTOR

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

REPORT OF NATURAL GAS SAFETY

INSPECTION NO: DC24-008

OPERATOR: City of Unadilla Gas System

INVESTIGATOR: Daniel Clemmons

INSPECTION DATE: January 24, 2024 REPORT MAILED DATE: April 29, 2025

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

Violation	Description	Inspection#	Date
192.13(c)	Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and...	LB13-007	2/4/2013
192.616(c)	The operator must follow the general program recommendations, including baseline and supplemental...	DL17-022	8/8/2017
192.465(d)	Each operator shall take prompt remedial action to correct any deficiencies indicated by the...	JH19-002	1/16/2019
192.603(b)	Each operator shall keep records necessary to administer the procedures established under §192.605.	JH19-002	1/16/2019
192.703(b)	Each segment of pipeline that becomes unsafe must be replaced, repaired, or removed from service.	DJ20-001	1/6/2020

3. CLEARED VIOLATIONS

Cleared on 1/24/2024

Violation	Description	Inspection#	Date
192.463(a)	Each cathodic protection system required by this subpart must provide a level of cathodic...	JH19-002	1/16/2019
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	DJ20-001	1/6/2020

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

On January 24 2024, Commission Staff reported to the City of Unadilla to perform a follow-up inspection of the Operator's previously existing probable violations.

During the inspection the Operator was represented by:
Clifford Taylor – Gas Lead
Peter Schultz – Consultant (Harp & Associates)

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

At the time of this inspection, the City of Unadilla was under six (6) previously existing probable violations. This report also addresses one Consent Agreement Pending. Staff reviewed these probable violations with the Operator and determined that:

PROBABLE VIOLATION CLEARED

In regard to the Warning Letter for the Probable Violation of §192.463(a) which was cited in Inspection Number JH19-002; in that inspection Staff stated: "Operator has failed to provide a level of cathodic protection with the applicable criteria they have chosen in Part 192 of appendix D which is -0.85."

FIRST OPERATORS RESPONSE: In their response to Inspection Number JH19-002, dated March 20, 2020, the City of Unadilla stated: "The City of Unadilla did experience a problem with the cathodic protection on the Housing Authority in Pinehurst but this situation has been cleared up as Harp and Associates worked to find and clear a short where the gas line was layinq in contact with a cast iron water main. These were separated and all readings found on the Housing Authority apartments after corrections were 1.2v or higher."

FIRST FOLLOW-UP INSPECTION: On January 6, 2020, Commission Staff reported to the City of Unadilla to perform a Follow-up Inspection of the Operator's existing Probable Violations and Warnings. (Ref. Inspection Number DJ20-001) In that inspection Staff stated: "During this inspection (DJ20-001) Staff found that Operator had not received the written report for Inspection Number JH19-002 so they had not had the opportunity to respond. Staff determined that this probable violation could not be cleared at this time."

SECOND OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number DJ20-001.

SECOND FOLLOWUP INSPECTION: During this inspection (DC24-009) Staff found that although the City of Unadilla failed to provide a response to Inspection Number DJ20-001, they did provide a response to the Warning Letter for this violation on March 20, 2020.

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

PROBABLE VIOLATIONS CONTINUING

1. In regard to the Notice of Probable Violation for 49CFR §192.13(c) (Ref: Commission Rule 515-9-1-.05) which was cited in Inspection Number LB13-007; in that inspection Staff stated that: "The operator

failed to follow its written procedure for responding to Grade I leak. Records verified that Grade I leak was not responded to properly. The operator had several Grade I leak that were discovered during the past five years of leakage surveys that were not responded to properly. Staff examined leak survey records which indicated that two Grade I leak were not repaired as required by the operator's procedures. Staff also examined records indicating that three Grade I leak were not responded to immediately but were left for several days after they were discovered. The improper response to these leaks represents a disregard for public safety."

FIRST OPERATOR RESPONSE: Staff found no response from the Operator to this inspection.

FIRST FOLLOWUP INSPECTION: On March 25, 2013, Staff conducted an inspection of the Operator leak repair orders and leak survey reports. (Ref Inspection Number JL13-016) In that inspection Staff stated: "On 3/25/2013 Staff reported to the City of Unadilla to review the operator's leak repair orders and leak survey reports. Staff met with Mr. Teriano Felder (Gas Superintendent) to investigate a complaint received at the Georgia Public Service Commission that the City of Unadilla did not respond to a leak that had been called in by the public. Staff reported to the City of Unadilla on 3rd Street @ Mulberry Street and found a Grade I leak located in a valve box. Staff notified Mr. Felder of the leak. Operator immediately responded, blocked off the intersection, and began investigating the leak and determined the source of the leak was a missing valve stem. Operator made the repairs and found no residual gas after the leak had been repaired. Staff examined the operator's leak reporting data, and found no evidence that the operator had previously been made aware of the leak. During this investigation, Staff examined the operator's leak survey records and did not find in previous leak surveys where this leak had been discovered; however, Staff did find that the City of Unadilla failed to repair or make safe multiple leaks found during the operator's leak survey from 2010-2012. Please see attached files labeled (Exhibit 1, Exhibit 2, Exhibit 3, and Exhibit 4) for copies of the leaks. Staff determined that this issue is currently being addressed under the operator's comprehensive inspection (LB13-007). Staff did not review the operator's existing probable violations during this inspection/Investigation."

SECOND OPERATOR RESPONSE: In their response to Inspection Number JL13-016, dated July 22, 2013, the City of Unadilla responded and stated that: "This letter is simply to inform you that your warning letter has been received and reviewed concerning existing probable violations to be corrected for the City of Unadilla. The warning letter was in reference to an on-site inspection of our gas system on March 25, 2013. We are pleased that no enforcement action or penalty assessment proceedings were taken. Please be assured that upon receiving the letter action was promptly taken to address each issue."

SECOND FOLLOWUP INSPECTION: On April 24, 2014, Staff conducted a follow-up inspection of the City of Unadilla's existing violations. (Ref: Inspection Number JL14-028). In that inspection, Staff stated that: "Staff determined that the Operator has failed to respond to this inspection."

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number JL14-028, dated April 3, 2015, The City of Unadilla stated that: "GPSC discovered that The City of Unadilla had some Grade 1 leaks that were not fixed in compliance with state and federal code. Since that time, the city has repaired all Grade 1's discovered immediately. The city has leak repair records on-site that indicate time of discovery, time of repair, action took to repair said leak, and who repaired the leak. These records are on-site for GPSC review."

THIRD FOLLOWUP INSPECTION: On August 25, 2015, Commission Staff reported to the City of Unadilla to perform a Drug and Alcohol/199 and Part 40 inspection. (Ref: Inspection Number DL15-032) In that inspection, Staff stated: "At the time of this inspection the City of Unadilla was under four previously existing probable violations. Due to the time which would be required to review these violations, and because this inspection was with the DER at City Hall, Staff did not address these probable violations during this inspection."

FOURTH OPERATOR RESPONSE: In their response to Inspection Number DL15-032, dated May 3, 2016, the City of Unadilla did not specifically address this probable violation; however they did state: "The City of Unadilla now has a new written Operations and Maintenance Procedures Manual in place and is making every effort to comply with all procedures as stated in the manual. New manual is ready for review by inspector(s) at their convenience."

FOURTH FOLLOW-UP INSPECTION: On August 7, 2017, Commission Staff reported to the City of Unadilla to perform a Follow-up inspection of the Operator's existing Probable Violations and Warnings. (Ref. Inspection Number DL17-021) At the time of this inspection the City of Unadilla was under sixteen (16) previously existing probable violations. In regard to this violation of §192.13(c) Staff stated: "During this inspection Staff determined that the time which would be required to re-evaluate the Operators leak discovery, notification, and repair program would require a separate follow-up inspection. Staff determined that this violation could not be cleared at this time."

FIFTH OPERATOR RESPONSE: In their response to Inspection Number DL17-021, dated December 7, 2017, the City of Unadilla did not specifically address this probable violation; however they stated: "This violation was due to the fact operator had failed to repair and document repairs that were made as required."

FIFTH FOLLOW-UP INSPECTION: On January 1, 2019, Commission Staff reported to the City of Unadilla to perform a Follow-up inspection of the Operator's existing Probable Violations and Warnings. (Ref. Inspection Number JH19-001). In that inspection Staff stated: " During this inspection JH19-001 during field inspections Staff rechecked one of the grade 1 leaks found in previous inspections and determined there was still gas present in the general area of original leak, therefore this probable violation cannot be cleared at this time."

SIXTH OPERATOR RESPONSE: In their response to Inspection Number JH19-001, dated October 4, 2019, the City of Unadilla stated: "PSC Staff found gas still present at 1 of the previous grades 1 leaks and would not clear violation. City of Unadilla staff has gone back and removed old service line and tap to kill all gas to this location. No gas detected."

SIXTH FOLLOW-UP INSPECTION: On January 6, 2020, Commission Staff reported to the City of Unadilla to perform a Follow-up Inspection of the Operator's existing Probable Violations and Warnings. (Ref. Inspection Number DJ20-001) "During this inspection (DJ20-001) Staff performed leak rechecks at four (4) locations where, according to the Operator, repairs had been made; however, the Operator could not produce documentation for any of these repairs. Staff found evidence of a leak at Hudson Construction at East Borum Street. The records the Operator did have indicated that this leak was originally found on August 30, 2010, and was recorded as a Grade 2 leak. Staff advised the Operator to immediately investigate the active leak to determine the classification of the leak and to make necessary permanent repairs to clear this leak. In addition, Staff advised the Operator to recheck other leak repairs from surveys that are missing field documentation, ensure that repairs are secure, and prepare the required field documentation. Staff determined that this probable violation could not be cleared at this time."

SEVENTH OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number DJ20-001.

SEVENTH FOLLOWUP INSPECTION: On January 7, 2020, Staff reported to the City of Unadilla Gas Department to perform an inspection of the Operator's Distribution Integrity Management Plan (DIMP) and Protocol 9 inspections for compliance with the minimum federal safety standards. (Ref. Inspection Number DJ20-002) In that inspection Staff stated: "At the time of this inspection, City of Unadilla was under thirteen (13) previously existing probable violation. These violations will be addressed under Follow-Up Inspection Number DJ20-001."

SEVENTH OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number DJ20-002.

EIGHTH FOLLOWUP INSPECTION: On May 27, 2020, Pipeline Safety Staff began performing an inspection on the City of Unadilla to conduct an inspection of the Operator's Drug and Alcohol misuse plan for compliance with the minimum federal safety standards. (Ref. Inspection Number DJ20-019) In that inspection Staff stated: "At the time of this inspection, City of Unadilla was under thirteen (13) previously existing probable violation. These violations will be addressed under Follow-Up Inspection Number DJ20-001."

EIGHTH OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number DJ20-019.

EIGHTH FOLLOWUP INSPECTION: On June 7, 2022, Staff reported to the City of Unadilla Gas Department to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-026) In that inspection Staff stated: "At the time of this inspection the City of Unadilla was under six (6) previously existing probable violations and one Consent Agreement Pending. Staff did not review any previously existing violations during this inspection."

NINTH OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number DJ22-026.

NINTH FOLLOWUP INSPECTION: On December 4, 2023, Staff reported to City of Unadilla to conduct an inspection of the Operator's operator qualification (OQ) program for compliance with the minimum federal standards in 49CFR §192, SubPart N. (Ref. Inspection Number JJ23-049) In that inspection Staff stated: "At the time of this inspection the City of Unadilla was under six (6) previously existing probable violations. Operator is negotiating a Consent Agreement with the FPU Director. Staff did not review these items during this inspection."

TENTH OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number JJ23-049.

TENTH FOLLOWUP INSPECTION: During this inspection (DC24-009) Staff found that the City of Unadilla did not provide a response to this continuing violation in Inspection Number DJ20-001. In that inspection Staff found evidence of continuing leaks at locations where ethe Operator stated that they had performed repair actions, but for which no documentation was available. The City of Unadilla also failed to provide any response to update the status of this violation in the subsequent inspections

they have received. These included Inspection Numbers DJ20-002 (DIMP); DJ20-019 (D&A); DJ22-026 (Methane Emission); and JJ24-049 (OQ).

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

2. In regard to Probable Violation §192.616(c) which was cited in DL17-022; in that inspection Staff stated that: "Based on the deficiencies identified under Questions 2.04, 2.06, 3.01, 3.02, 3.03, 4.01, 4.02, 4.03, 4.04, 4.05, 4.06, and 4.07 of the PHMSA Public Awareness Program Effectiveness Inspection Checklist, the City of Unadilla has failed to conduct a Public Awareness Program as required by 49CFR §192.616."

   Staff proposed a civil penalty of $2,500.00 for this violation. This civil penalty was addressed in a Consent Agreement with the Director on October 21, 2020.

   FIRST OPERATOR RESPONSE: In their response letter to Inspection Number DL17-022, dated December 5, 2017, the City of Unadilla failed to address the identified deficiencies with their PAP program; however, they stated: "Operators existing Public Awareness Plan failed to comply with all requirements of API RP 1162 and records that would have documented that the operator was doing what was required could not be found during this inspection. Operator has started making the necessary changes to correct this situation with Ms. Sabrina Sinyard —Assistant to the Mayor taking over the PAP program and doing what is required to comply with these regulations."

   FIRST FOLLOWUP INSPECTION: On September 17-18, 2018, Staff conducted a follow-up inspection of the Operators previously existing probable violations. (Ref. Inspection Number LB18-041) In that inspection Staff stated: "At the time of this inspection Staff elected not to conduct a follow up inspection of the previously existing probable violations because there is an ongoing follow up inspection under JH18-011." (Note from Supervisor Review of DC24-008 – Inspection Number JH18-011 was not completed in CY 2018 and was continued into CY2019 under Inspection Number JH19-001)

   SECOND OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number LB18-041.

   SECOND FOLOWUP INSPECTION: On January 1, 2019, Commission Staff reported to the City of Unadilla to perform a follow-up inspection of the Operator's previously existing probable violations. (Ref. Inspection Number JH19-001) In that inspection Staff stated: "During this inspection (JH19-001) Staff determined that due to the extent of the deficiencies which were identified regarding the Operators Public Awareness Program that a complete PAP Inspection would have to be performed to properly address this probable violation."

   THIRD OPERATOR RESPONSE: In their response to Inspection Number JH19-001, dated October 14, 2019 the City of Unadilla stated: "The corrections have been made to the existing PAP plan and the requirements to be performed by operator have been performed. This violation needs a follow-up inspection and operator believes it can be cleared up."

   THIRD FOLLOW-UP INSPECTION: On January 6, 2020, Commission Staff reported to the City of Unadilla to perform a Follow-up Inspection of the Operator's existing Probable Violations and Warnings. (Ref. Inspection Number DJ20-001) In that inspection Staff stated: "During this inspection (DJ20-001) Staff determined that due to the extent of the deficiencies which were identified regarding

the Operators Public Awareness Program that a complete PAP Inspection would have to be performed to properly address this probable violation. Staff determined that this violation cannot be cleared at this time."

FOURTH OPERATORS RESPONSE: Staff found no response from the Operator for Inspection Number DJ20-001.

FOURTH FOLLOWUP INSPECTION: During this inspection (DC24-009) Staff determined that due to the extent of the deficiencies which were identified regarding the Operators Public Awareness Program that a complete PAP Inspection would have to be performed to properly address this probable violation. Staff determined that this violation cannot be cleared at this time. Staff found that the City of Unadilla did not provide a response to this continuing violation in Inspection Number DJ20-001. They also failed to provide any response to update the status of this violation in the subsequent inspections they have received. These included Inspection Numbers DJ20-002 (DIMP); DJ20-019 (D&A); DJ22-026 (Methane Emission); and JJ24-049 (OQ).

3. In regard to the Probable Violation §192.465(d) which was cited in Inspection Number JH19-002; in that inspection Staff stated: "Operator failed to take remedial action on discrepancies found during monitoring of their cathodic protection system."

   FIRST OPERATOR RESPONSE: In their response to Inspection Number JH19-002, dated March 20, 2020, the City of Unadilla stated: "The City of Unadilla and its consultant continue to work and make changes to its cathodic protection system and make corrections when problems are found. Operator is not real sure what the inspector is talking about as he never stated that there were problems that had not been addressed. The operator will continue to make corrections as problems are found.

   FIRST FOLLOW-UP INSPECTION: On January 6, 2020, Commission Staff reported to the City of Unadilla to perform a Follow-up Inspection of the Operator's existing Probable Violations and Warnings. (Ref. Inspection Number DJ20-001) In that inspection Staff stated: "During this inspection (DJ20-001) Staff found that Operator had not received the written report for Inspection Number JH19-002 so they had not had the opportunity to respond. Staff determined that this probable violation could not be cleared at this time."

   SECOND OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number DJ20-001.

   SECOND FOLLOW-UP INSPECTION: On May 27, 2020, Pipeline Safety Staff began performing an inspection on the City of Unadilla to conduct an inspection of the Operator's Drug and Alcohol misuse plan for compliance with the minimum federal safety standards. (Ref. Inspection Number DJ20-019) In that inspection Staff stated: "At the time of this inspection, City of Unadilla was under thirteen (13) previously existing probable violation. These violations will be addressed under Follow-Up Inspection Number DJ20-001."

   THIRD OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number DJ20-019.

   THIRD FOLLOWUP INSPECTION: On June 7, 2022, Staff reported to the City of Unadilla Gas Department to perform an inspection of the Operator's methane emission reduction plan for compliance

with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-026) In that inspection Staff stated: "At the time of this inspection the City of Unadilla was under six (6) previously existing probable violations and one Consent Agreement Pending. Staff did not review any previously existing violations during this inspection."

FOURTH OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number DJ22-026.

FOURTH FOLLOWUP INSPECTION: On December 4, 2023, Staff reported to City of Unadilla to conduct an inspection of the Operator's operator qualification (OQ) program for compliance with the minimum federal standards in 49CFR §192, SubPart N. (Ref. Inspection Number JJ23-049) In that inspection Staff stated: "At the time of this inspection the City of Unadilla was under six (6) previously existing probable violations. Operator is negotiating a Consent Agreement with the FPU Director. Staff did not review these items during this inspection."

FIFTH OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number JJ23-049.

FIFTH FOLLOW-UP INSPEECTION: During this inspection (DC24-009) Staff found that the Operator failed to address this violation in their initial response to Inspection Number JH19-002. Staff also found that that the City of Unadilla did not provide a response to this continuing violation in Inspection Number DJ20-001. They also failed to provide any response to update the status of this violation in the subsequent inspections they have received. These included Inspection Numbers DJ20-002 (DIMP); DJ20-019 (D&A); DJ22-026 (Methane Emission); and JJ24-049 (OQ).

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

4. In regard to the Probable Violation §192.603(b) which was cited in Inspection Number JH19-002; in that inspection Staff stated: "The City of Unadilla failed to keep records which demonstrate that they have complied with the procedures they established to meet the requirements of §192.605".

   FIRST OPERATOR RESPONSE: In their response to Inspection Number JH19-002, dated March 20, 2020, the City of Unadilla stated: "The City of Unadilla 2017 DOT 7100 Annual Report listed 4 corrosion leaks on its qas system, however, no records of any corrosion leaks could be found either in the annual leak survey or leak repair records. This appears to have been a typo error on the report and a supplemental report will be filed with PHMSA stating this was a mistake."

   FIRST FOLLOW-UP INSPECTION: On January 6, 2020, Commission Staff reported to the City of Unadilla to perform a Follow-up Inspection of the Operator's existing Probable Violations and Warnings. (Ref. Inspection Number DJ20-001) In that inspection Staff stated: "During this inspection (DJ20-001) Staff found that Operator had not received the written report for Inspection Number JH19-002 so they had not had the opportunity to respond. Staff determined that this probable violation could not be cleared at this time."

   SECOND OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number DJ20-001.

SECOND FOLLOW-UP INSPECTION: On May 27, 2020, Pipeline Safety Staff began performing an inspection on the City of Unadilla to conduct an inspection of the Operator's Drug and Alcohol misuse plan for compliance with the minimum federal safety standards. (Ref. Inspection Number DJ20-019) In that inspection Staff stated: "At the time of this inspection, City of Unadilla was under thirteen (13) previously existing probable violation. These violations will be addressed under Follow-Up Inspection Number DJ20-001."

THIRD OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number DJ20-019.

THIRD FOLLOWUP INSPECTION: On June 7, 2022, Staff reported to the City of Unadilla Gas Department to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-026) In that inspection Staff stated: "At the time of this inspection the City of Unadilla was under six (6) previously existing probable violations and one Consent Agreement Pending. Staff did not review any previously existing violations during this inspection."

FOURTH OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number DJ22-026.

FOURTH FOLLOWUP INSPECTION: On December 4, 2023, Staff reported to City of Unadilla to conduct an inspection of the Operator's operator qualification (OQ) program for compliance with the minimum federal standards in 49CFR §192, SubPart N. (Ref. Inspection Number JJ23-049) In that inspection Staff stated: "At the time of this inspection the City of Unadilla was under six (6) previously existing probable violations. Operator is negotiating a Consent Agreement with the FPU Director. Staff did not review these items during this inspection."

FIFTH OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number JJ23-049.

FIFTH FOLLOW-UP INSPEECTION: During this inspection (DC24-009) Staff found that the City of Unadilla did provide a response to this initial violation on March 20, 2020. Staff also found that the City of Unadilla did file a Supplemental update to their CY2017 7100 report on January 8, 2024, This report indicates that there was one (1) corrosion leak on their system in CY2017.

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

5. In regard to the Warning Letter §192.703(b) which was cited in Inspection Number DJ20-001; in that inspection Staff stated that: "The City of Unadilla has failed to ensure that each segment of pipeline that becomes unsafe has been replaced, repaired, or removed from service as required.

   FIRST OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number DJ20-001.

   FIRST FOLLOW-UP INSPECTION: On May 27, 2020, Pipeline Safety Staff began performing an inspection on the City of Unadilla to conduct an inspection of the Operator's Drug and Alcohol misuse plan for compliance with the minimum federal safety standards. (Ref. Inspection Number DJ20-019)

In that inspection Staff stated: "At the time of this inspection, City of Unadilla was under thirteen (13) previously existing probable violation. These violations will be addressed under Follow-Up Inspection Number DJ20-001."

SECOND OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number DJ20-019.

SECOND FOLLOWUP INSPECTION: On June 7, 2022, Staff reported to the City of Unadilla Gas Department to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-026) In that inspection Staff stated: "At the time of this inspection the City of Unadilla was under six (6) previously existing probable violations and one Consent Agreement Pending. Staff did not review any previously existing violations during this inspection."

THIRD OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number DJ22-026.

THIRD FOLLOWUP INSPECTION: On December 4, 2023, Staff reported to City of Unadilla to conduct an inspection of the Operator's operator qualification (OQ) program for compliance with the minimum federal standards in 49CFR §192, SubPart N. (Ref. Inspection Number JJ23-049) In that inspection Staff stated: "At the time of this inspection the City of Unadilla was under six (6) previously existing probable violations. Operator is negotiating a Consent Agreement with the FPU Director. Staff did not review these items during this inspection."

FOURTH OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number JJ23-049.

FOURTH FOLLOWUP INSPECTION: During this inspection (DC24-009) Staff found that the City of Unadilla did not provide a response to this violation in Inspection Number DJ20-001. They also failed to provide any response to update the status of this violation in the subsequent inspections they have received. These included Inspection Numbers DJ20-002 (DIMP); DJ20-019 (D&A); DJ22-026 (Methane Emission); and JJ24-049 (OQ).

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

CONSENT AGREEMENT CLEARED

Staff determined, the FPU Director and the City of Unadilla sign a Joint Consent Agreement on October 20, 2020. In this Consent Agreement, the FPU Director agrees to settle this matter with the City Unadilla as follows:

1. Unadilla shall execute this Consent Agreement within thirty (30) days of the Commission's approval of said Consent Agreement.
   - Staff determined that the Operator has addressed this item.

2. Unadilla shall have a third-party, system-wide leak survey conducted on its system no later than March 2021. The results of this survey shall be made available to pipeline safety staff.

- Staff determined the City Unadilla used a third-party to conducted system-wide leak survey in January 2021.
- Staff determined; the City of Unadilla has addressed that issue at this time.

3. Unadilla shall repair any and all leaks documented in their leak survey report within three (3) months.
   - Staff determined that the Operator has addressed this item.

4. Unadilla shall submit a certificate check for Five Thousand ($5,000) dollars made payable to the Georgia Public Service Commission within thirty (30) days of the Commission's approval of the Consent Agreement. The city's name, Docket Number, and Inspection Report number shall be written in the "memo" line of the certified check
   - Staff determined the Five Thousand ($5,000) check was received on March 21, 2022. (JL14-028 / DL15-032 / JB16-001 / DL17-002).
   - Staff determined that the Operator has addressed this item.

5. Unadilla shall mail the check to: Ms. Michelle Thebert, Director Facilities Protection Unit, Georgia Public Service Commission, 244 Washington Street, Atlanta, Georgia 30334.
   - Staff determined that the Operator has addressed this item.

Staff determined that the Operator has complied with the terms of the Consent Agreement which was signed on October 21, 2020.

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 Unadilla

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37095

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
☐ Notice of Amendment (NOA)	☐ Yes ☐ No
☐ Warning Letter	☐ Yes ☐ No
☐ Letter of Concern	☐ Yes ☐ No
☐ Observed Issue	☐ Yes ☐ No
☐ Proposed Civil Penalty	☐ Yes ☐ No

$_____
Proposed Penalty for this violation

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 Unadilla Gas System	)	**DOCKET NO. 37095**
	)	
	)	
	)	

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

*The Honorable Myron Mixon, Mayor
City of Unadilla Gas System
P.O. Box 307
Unadilla, GA 31091
myronmixon@yahoo.com

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

Respectfully Submitted this 5th day of May 2025:

Cathy Nesbitt

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