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Georgia Public Service Commission

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Docket No. 37098

DOCKET# 37098
DOCUMENT# 223141

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

REF: Follow Up Inspection # JB24-001

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Ms. LaRhonda W. Patrick

On January 1, 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 JB24-001 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. 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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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: JB24-001

OPERATOR: City of Warner Robins Gas System

INVESTIGATOR: Jeff Baggett

INSPECTION DATE: January 1, 2024 REPORT MAILED DATE: June 25, 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
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	JL17-031	9/18/2017
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

3. CLEARED VIOLATIONS

Cleared on 1/1/2024

Violation	Description	Inspection#	Date
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
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

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

On July 17, 2023 Staff reported to the City of Warner Robins Gas System to perform a follow-up inspection of the Operators previously existing probable violations.

During this inspection, the Operator was represented by:
Danny Lyndall – VP Operations, Southern Region, ESG, Inc.
Robbie Miller – Regional Gas Manager, ESG, Inc.
Billy Meeks – Gas Superintendent, ESG, Inc.
Josh Lairsey – Compliance Manager, ESG, Inc.

Commission Staff was represented by:
Jeff Baggett – Lead Inspector
Jack Hewitt – Pipeline Safety Inspector

At the time of this inspection, the City of Warner Robins Gas System was under five (5) previously existing probable violations. The Operator is also negotiating a Consent Agreement with the Director for the proposed civil penalties for probable violations which were cited in Inspection Numbers DL14-032; JL16-006; KR20-044, and KR21-001.

Inspection Number	Violation Cited	Proposed Civil Penalty	Date Cleared	Insp # Cleared
DL14-032	§192.739(a)	$7,500.00	10/26/2016	DJ16-047
DL14-032	§192.241(a)	$45,000.00	10/26/2016	DJ16-047
DL14-032	§192.285(a)	$195,000.00	10/26/2016	DJ16-047
JL16-006	§192.723(b)(2)	$7,500.00	9/18/2017	JL17-031
KR20-044	§192.703(c)	$7,500.00	5/18/2021	KR21-016
KR20-044	§192.481	$7,500.00	5/18/2021	KR21-016
KR20-044	§192.805(e)	$7,500.00	5/18/2021	KR21-016
KR21-001	§192.705(b)	$7,500.00	11/9/2020	KR21-019
KR21-001	§192.605(a) / §192.703(b)	$7,500.00	7/17/2023	JB23-012
KR21-001	§192.605(a) / §192.465(a)	$7,500.00	7/17/2023	JB23-012

Staff reviewed these previously existing probable violations with the Operator and determined that:

PROBABLE VIOLATION CLEARED

1. In regard to the Probable Violation of 49CFR, §192.605(a) which was cited under inspection #LB20-016; in that report Staff stated that: "The City of Warner Robins failed to repair a reported leak in accordance with their established O&M procedures."

   Staff proposed a civil penalty of $7,500.00 for this probable violation.

   OPERATOR RESPONSE: in their response letter to Inspection Number LB20-016; dated September 16, 2020 the Operator requested an informal conference with the Director to discuss the proposed civil penalty for this violation.

   The Operator also stated: "Warner Robins will ensure that its personnel will follow procedures when repairing leaks and performing other tasks. Further, Warner Robins will ensure that its personnel will stop the flow of gas to the extent possible prior to repairing, leaks unless the protection of life or

property make it necessary to make repairs or take related action with gas escaping from the pipeline. By October 15. 2020, Warner Robins will revise its Operations and Maintenance Manual and Procedures to address these issues."

FIRST FOLLOW-UP INSPECTION: On August 20, 2020 Staff reported to the City of Warner Robins to investigate a complaint of a natural gas leak which had not been repaired. (Ref. Inspection Number JB20-009. In that inspection Staff stated: "At the time of this investigation the City of Warner Robins was under six (6) previously existing probable violations. Because this investigation was being performed to specifically address a complaint from the public, Staff did not review these items."

OPERATOR RESPONSE: In their response letter to Inspection Number JB20-009, dated October 19, 2020, the Operator stated: "Warner Robins will ensure that its personnel will follow procedures when repairing leaks and performing other tasks. Further, Warner Robins will ensure that its personnel will stop the flow of gas to the extent possible prior to repairing leaks unless the protection of life or property make it necessary to make repairs or take related action with gas escaping from the pipeline. By October 15, 2020, Warner Robins will revise its Operations and Maintenance Manual and Procedures to address these issues."

SECOND FOLLOW-UP INSPECTION: On October 26, 2020 staff reported to Warner Robins to perform a follow-up and a comprehensive inspection. (Ref. Insp Number KR20-043) At the time of this inspection the Operator was able to provide the changes made to their Operator Qualification Plan that states " Warner Robins will ensure that its personnel will follow procedures when repairing leaks and performing other tasks." However it is not clear how Warner Robins will determine when its personnel will stop the flow of gas to the extent possible prior to repairing leaks. Staff determined that this probable violation cannot be cleared at this time.

OPERATOR RESPONSE: In their response letter to Inspection Number KR20-043 dated March 2, 2021 the Operator stated: "Warner Robins will ensure that its personnel take all reasonable efforts to stop the flow of gas prior working in a gaseous (flammable) atmosphere.

Examples of reasonable efforts to stop the flow of gas include, but are not limited to:

- Closing Critical or Emergency Valve(s),
- Squeeze-off of steel mains/services utilizing appropriate squeeze-off tools,
- Squeeze-off of plastic (PE) mains/services utilizing appropriate squeeze-off tools in separate location(s) from the blowing gas due to the inherent risk of static electricity,
- Utilization of existing stopple fittings to stop the flow of gas, and
- Other methods of safely controlling the flow of gas based on sound engineering practices.

Warner Robins realizes that there may be some instances, due to circumstances where there is Imminent threat to life or property, where personnel may need to perform response or repair functions in a gaseous (flammable) atmosphere. In those instances, Warner Robins personnel shall use appropriate Personal Protective Equipment (PPE) in accordance with Warner Robins procedures and GPSC Regulations while performing work in a gaseous (flammable) atmosphere."

FOURTH FOLLOW-UP INSPECTION: On March 30, 2021, Staff reported to the City of Warner Robins Gas System to perform a review of the leak survey results for schools from the Operators recent survey. (Ref. Inspection Number JB21-004) In that inspection Staff stated: "At the time of this review the City of Warner Robins Gas System was under four (4) previously existing probable violations, and a consent agreement. Because this review was specifically to address the issue of leak surveys and

rechecks at schools related to the Hazardous Facility Order, which was issued under Inspection Number KR20-004, Staff did not review these items."
OPERATOR RESPONSE: In their response letter to Inspection Number JB21-004, dated May 19, 2021, the Operator stated: "Warner Robins will ensure that is personnel take all reasonable efforts to stop the flow of gas prior to working in a gaseous (flammable) atmosphere. Examples of reasonable efforts to stop the flow of gas include, but are not limited to: Closing Critical or Emergency Valve(s), Squeeze-off of steel mains/services utilizing appropriate squeeze-off tools, Squeeze-off of plastic (PE) mains/services utilizing appropriate squeeze-off tools in separate location(s) from the blowing gas due to the inherent risk of static electricity, Utilization of existing stopple fittings to stop the flow of gas, and Other methods of safely controlling the flow of gas based on sound engineering practices.
Warner Robins realizes that there may be some instances, due to circumstances where there is imminent threat to life or property, where personnel may need to perform response or repair functions in a gaseous (flammable) atmosphere. In those instances, Warner Robins personnel shall use appropriate Personal Protective Equipment (PPE) in accordance with Warner Robins' procedures and GPSC Regulations while performing work in a gaseous (flammable) atmosphere."

FIFTH FOLLOW-UP INSPECTION: On May 19 2021, Commission Staff reported to the City of Warner Robins to conduct a follow-up inspection of the Operators previously existing probable violations written in the Hazardous Facility Order that falls under inspection number KR20-044. (Ref. Inspection Number KR21-019) Staff did not review this violation during this inspection.

OPERATOR RESPONSE: In their response to Inspection Number KR21-016, dated November 15, 2021, the Operator stated: "Warner Robins will continue to ensure that its personnel take all reasonable efforts to stop the flow of gas prior to working in a gaseous (flammable) atmosphere. Examples of reasonable efforts to stop the flow of gas include, but are not limited to: Closing Critical or Emergency Valve(s), squeeze-off of steel mains/services utilizing appropriate squeeze-off tools, squeeze-off of plastic (PE) mains/services utilizing appropriate squeeze-off tools in separate location(s) from the blowing gas due to the inherent risk of static electricity, utilization of existing stopple fittings to stop the flow of gas, and other methods of safely controlling the flow of gas based on sound engineering practices. Warner Robins realizes that there may be circumstances in which there is imminent threat to life or property where personnel may need to perform response or repair functions in a gaseous (flammable) atmosphere. In those instances, Warner Robins personnel shall use appropriate Personal Protective Equipment (PPE) in accordance with Warner Robins' procedures and GPSC Regulations while performing work in a gaseous (flammable) atmosphere."

SIXTH FOLLOW-UP INSPECTION: On August 18, 2021 Pipeline Safety Staff began performing an inspection on the City of Warner Robins' anti-drug and alcohol program for their gas department. On November 22, 2021 Staff reported to Warner Robins to complete the inspection. (Ref. Inspection Number JS21-026). In that inspection Staff stated: "At the time of this inspection the City of Warner Robins Gas Department was under four previously existing probable violations and have two pending consent agreements. Staff did not review these items during the drug & alcohol inspection because they were meeting with the Operator's DER and not gas department personnel."

OPERATOR RESPONSE In their response letter to Inspection Number JS21-026, dated March 16, 2022, the Operator stated: "Warner Robins will continue to ensure that its personnel take all reasonable efforts to stop the flow of gas prior to working in a gaseous (flammable) atmosphere. Examples of reasonable efforts to stop the flow of gas include, but are not limited to: Closing Critical or Emergency Valve(s), squeeze-off of steel mains/services utilizing appropriate squeeze-off tools, squeeze-off of plastic (PE) mains/services utilizing appropriate squeeze-off tools in separate location(s) from the blowing gas due to the inherent risk of static electricity, utilization of existing stopple fittings to stop

the flow of gas, and other methods of safely controlling the flow of gas based on sound engineering practices. Warner Robins realizes that there may be circumstances in which there is imminent threat to life or property where personnel may need to perform response or repair functions in a gaseous (flammable) atmosphere. In those instances, Warner Robins personnel shall use appropriate Personal Protective Equipment (PPE) in accordance with Warner Robins' procedures and GPSC Regulations while performing work in a gaseous (flammable) atmosphere."

SEVENTH FOLLOW-UP INSPECTION: On June 24, 2022, Staff requested the City of Warner Robin's Methane Emissions O&M Plans (distribution and transmission), along with documentation to support the plans and other relevant documentation for hazardous leaks and releases of gas. On June 28, 2022, Warner Robins replied with the requested information and Staff began the inspection on June 28-29, 2022. (Ref. Inspection Number DL22-028 and DL22-030) In that inspection Staff stated: "At the time of this inspection, the City of Warner Robins was under six (6) previously existing probable violations and two (2) consent agreements. Staff did not review the existing probable violation at the time of this inspection."

OPERATOR RESPONSE In their response letter to Inspection Number DL22-028, dated November 21, 2022, the Operator stated: "Warner Robins will continue to ensure that its personnel take all reasonable efforts to stop the flow of gas prior to working in a gaseous (flammable) atmosphere. Examples of reasonable efforts to stop the flow of gas include, but are not limited to: Closing Critical or Emergency Valve(s), squeeze-off of steel mains/services utilizing appropriate squeeze-off tools, squeeze-off of plastic (PE) mains/services utilizing appropriate squeeze-off tools in separate location(s) from the blowing gas due to the inherent risk of static electricity, utilization of existing stopple fittings to stop the flow of gas, and other methods of safely controlling the flow of gas based on sound engineering practices. Warner Robins realizes that there may be circumstances in which there is imminent threat to life or property where personnel may need to perform response or repair functions in a gaseous (flammable) atmosphere. In those instances, Warner Robins personnel shall use appropriate Personal Protective Equipment (PPE) in accordance with Warner Robins' procedures and GPSC Regulations while performing work in a gaseous (flammable) atmosphere."

EIGHTH FOLLOW-UP INSPECTION: During this inspection (Inspection Number JB24-001) Staff discussed this violation and the Operators revised procedures. Since this violation was issued the Operator has contracted with ESG, Inc. to operate their system. The ESG representatives indicated to Staff that their policy is for their personnel to avoid working in a flammable environment, and of it is necessary that their employees are only to perform work with the proper PPE. The Operator also provided documentation which demonstrated that the ESG, Inc. personnel who are responding to leaks were re-qualified on leak response tasks.

Staff determined that this violation can be cleared.

2. In regard to the Probable Violation of 49CFR, §191.29(b) which was cited in Inspection Number KR21-001, in that inspection Staff stated: "The City of Warner Robins failed to update the National Pipeline Mapping system as required."

   OPERATOR RESPONSE: In their response letter to Inspection Number KR21-001, dated May 27, 2021 the Operator stated: "The National Pipeline Mapping System has been updated as required. Warner Robins will ensure that future updates are submitted timely."

FIRST FOLLOW-UP INSPECTION: On March 30, 2021 Staff reported to the City of Warner Robins Gas System to perform a review of the leak survey results for schools from the Operators recent survey. (Ref. Inspection Number JB21-004) In that inspection Staff stated: "At the time of this review the City of Warner Robins Gas System was under four (4) previously existing probable violations, and a consent agreement. Because this review was specifically to address the issue of leak surveys and rechecks at schools related to the Hazardous Facility Order, which was issued under Inspection Number KR20-004, Staff did not review these items.

OPERATOR RESPONSE: In their response letter to Inspection Number JB21-004, dated May 27, 2021 the Operator stated: "The National Pipeline Mapping System has been updated as required. Warner Robins will ensure that future updates are submitted timely."

SECOND FOLLOW-UP INSPECTION: On May 19 2021, Commission Staff reported to the City of Warner Robins to conduct a follow-up inspection of the Operators previously existing probable violations written in the Hazardous Facility Order that falls under inspection number KR20-044. (Ref. Inspection Number KR21-016) Staff did not address this violation in this inspection.

OPERATOR RESPONSE: In their response letter to Inspection Number KR21-016, dated November 23, 2021 the Operator stated: "The National Pipeline Mapping System has been updated as required. Warner Robins will ensure that future updates are submitted timely."

THIRD FOLLOW-UP INSPECTION: On August 18, 2021 Pipeline Safety Staff began performing an inspection on the City of Warner Robins' anti-drug and alcohol program for their gas department. On November 22, 2021 Staff reported to Warner Robins to complete the inspection. (Ref. Inspection Number JS21-026) In that inspection Staff stated: "At the time of this inspection the City of Warner Robins Gas Department was under four previously existing probable violations and have two pending consent agreements. Staff did not review these items during the drug & alcohol inspection because they were meeting with the Operator's DER and not gas department personnel."

OPERATOR RESPONSE: In their response letter to Inspection Number JS21-026, dated March 24, 2022 the Operator stated: "The National Pipeline Mapping System has been updated as required including the 2022 notification. Warner Robins will ensure that future updates are submitted timely."

FOURTH FOLLOW-UP INSPECTION: On June 24, 2022, Staff requested the City of Warner Robin's Methane Emissions O&M Plans (distribution and transmission), along with documentation to support the plans and other relevant documentation for hazardous leaks and releases of gas. On June 28, 2022, Warner Robins replied with the requested information and Staff began the Inspection on July 11-14, 2022. (Ref. Inspection Numbers DL22-08 and DL22-030) In those inspections Staff stated: "At the time of this inspection, the City of Warner Robins was under six (6) previously existing probable violations and two (2) consent agreements. Staff did not review the existing probable violation at the time of this inspection."

OPERATOR RESPONSE: In their response letter to Inspection Number DL22-028, dated November 21, 2022 the Operator stated: "The National Pipeline Mapping System has been updated as required including the 2022 notification. Warner Robins will ensure that future updates are submitted timely."

FIFTH FOLLOW-UP INSPECTION: During this inspection (Inspection Number JB24-001) Staff reviewed the Operators facilities in NPMS and found that the Revision Date in the system indicated 1/11/2023, however, the information for Emergency Contact still reflects the same gas superintendent who was identified as being gone for several years at the time the original violation was cited. However,

the Operator showed Staff where they had submitted updates for NPMS through the PHMSA Portal, but the changes have not yet flowed through to the NPMS system.

Staff determined that this violation can be cleared.

3. In regard to the Probable Violation of 49CFR §192.605(a) which was cited in Inspection Number KR21-001; in that inspection Staff cited two issues:

   a. In regard to the Probable Violation of §192.605(a) / 192.703(b) which was cited in Inspection Number KR21-001; in that inspection Staff stated: "The Operator failed to ensure that each segment of pipeline that becomes unsafe is replaced, repaired, or removed from service as required under §192.703(b)."

      Staff proposed a civil penalty of $7,500.00 for this probable violation.

      OPERATOR RESPONSE: In their response to Inspection Number KR21-001, dated May 27, 2021, the Operator stated that: "The referenced leaks have been repaired. Warner Robins has taken steps to ensure that leaks are repaired timely and properly in the future by contracting with ESG Operations to perform operations and maintenance tasks on its facilities, utilizing computerized maintenance management systems software to schedule and track required asset-based activities, and performing regular Operator Qualification training and qualifying."

      FIRST FOLLOW-UP INSPECTION: On March 30, 2021 Staff reported to the City of Warner Robins Gas System to perform a review of the leak survey results for schools from the Operators recent survey. (Ref. Inspection Number JB21-004) In that inspection Staff stated: "At the time of this review the City of Warner Robins Gas System was under four (4) previously existing probable violations, and a consent agreement. Because this review was specifically to address the issue of leak surveys and rechecks at schools related to the Hazardous Facility Order, which was issued under Inspection Number KR20-004, Staff did not review these items.

      OPERATOR RESPONSE: In their response letter to Inspection Number JB21-004, dated May 27, 2021 the Operator stated: "The referenced leaks have been repaired. Warner Robins has taken steps to ensure that leaks are repaired timely and properly in the future by contracting with ESG Operations to perform operations and maintenance tasks on its facilities, utilizing computerized maintenance management systems software to schedule and track required asset-based activities, and performing regular Operator Qualification training and qualifying."

      SECOND FOLLOW-UP INSPECTION: On May 19 2021, Commission Staff reported to the City of Warner Robins to conduct a follow-up inspection of the Operators previously existing probable violations written in the Hazardous Facility Order that falls under inspection number KR20-044. (Ref. Inspection Number KR21-016) Staff did not address this violation in this inspection.

      OPERATOR RESPONSE: In their response letter to Inspection Number KR21-016, dated November 23, 2021 the Operator stated: "The referenced leaks have been repaired. Warner Robins has taken steps to ensure that leaks are repaired timely and properly in the future by contracting with ESG Operations to perform operations and maintenance tasks on its facilities, utilizing computerized maintenance management systems software to schedule and track required asset-based activities, and performing regular Operator Qualification training and qualifying."

THIRD FOLLOW-UP INSPECTION: On August 18, 2021 Pipeline Safety Staff began performing an inspection on the City of Warner Robins' anti-drug and alcohol program for their gas department. On November 22, 2021 Staff reported to Warner Robins to complete the inspection. (Ref. Inspection Number JS21-026) In this inspection Staff stated: "At the time of this inspection the City of Warner Robins Gas Department was under four previously existing probable violations and have two pending consent agreements. Staff did not review these items during the drug & alcohol inspection because they were meeting with the Operator's DER and not gas department personnel."

OPERATOR RESPONSE: In their response letter to Inspection Number JS21-026, dated March 24, 2022 the Operator stated: "The referenced leaks have been repaired. Warner Robins has taken steps to ensure that leaks are being repaired timely and properly by contracting with ESG Operations to perform operations and maintenance tasks on its facilities, utilizing computerized maintenance management systems software to schedule and track required asset-based activities, and performing regular Operator Qualification training and qualifying."

FOURTH FOLLOW-UP INSPECTION: On June 24, 2022, Staff requested the City of Warner Robin's Methane Emissions O&M Plans (distribution and transmission), along with documentation to support the plans and other relevant documentation for hazardous leaks and releases of gas. On June 28, 2022, Warner Robins replied with the requested information and Staff began the Inspection on July 11-14, 2022. (Ref. Inspection Numbers DL22-08 and DL22-030) In those inspections Staff stated: "At the time of this inspection, the City of Warner Robins was under six (6) previously existing probable violations and two (2) consent agreements. Staff did not review the existing probable violation at the time of this inspection."

OPERATOR RESPONSE: In their response letter to Inspection Number DL22-028, dated November 21, 2022 the Operator stated: "The referenced leaks have been repaired. Documentation will be provided to GPSC Staff. Warner Robins has taken steps to ensure that leaks are being repaired timely and properly by contracting with ESG Operations to perform operations and maintenance tasks on its facilities, utilizing computerized maintenance management systems software to schedule and track required asset-based activities, and performing regular Operator Qualification training and qualifying"

FIFTH FOLLOW-UP INSPECTION: During this inspection (Inspection Number JB24-001) the Operator provided a work order for the repair of a 16-inch valve which was found to be source of the leak in the original violation. The Operator also provided documentation which demonstrated that the ESG, Inc. personnel who are responding to leaks were re-qualified on leak response tasks.

Staff determined that this violation has been addressed.

b. In regard to the Probable Violation of §192.605(a) / 192.465(a) which was cited in Inspection Number KR21-001; in that inspection Staff stated: "The Operator failed to follow their procedures regarding corrosion control monitoring as required under section 192.605(a)."

Staff proposed a civil penalty of $7,500.00 for this probable violation.

OPERATOR RESPONSE: In their response to Inspection Number KR21-001, dated May 27, 2021, the Operator stated: "A complete cathodic protection survey was performed in 2020. The survey for this year is scheduled for August 2021. Warner Robins has taken steps to ensure that cathodic protection surveys are performed timely and properly in the future by contracting with ESG

Operations to perform operations and maintenance tasks on its facilities, utilizing computerized maintenance management systems software to schedule and track required asset-based activities, and performing regular Operator Qualification training and qualifying."

FIRST FOLLOW-UP INSPECTION: On March 30, 2021 Staff reported to the City of Warner Robins Gas System to perform a review of the leak survey results for schools from the Operators recent survey. (Ref. Inspection Number JB21-004) In that inspection Staff stated: "At the time of this review the City of Warner Robins Gas System was under four (4) previously existing probable violations, and a consent agreement. Because this review was specifically to address the issue of leak surveys and rechecks at schools related to the Hazardous Facility Order, which was issued under Inspection Number KR20-004, Staff did not review these items.

OPERATOR RESPONSE: In their response letter to Inspection Number JB21-004, dated May 27, 2021 the Operator stated: "A complete cathodic protection survey was performed in 2020. The survey for this year is scheduled for August 2021. Warner Robins has taken steps to ensure that cathodic protection surveys are performed timely and properly in the future by contracting with ESG Operations to perform operations and maintenance tasks on its facilities, utilizing computerized maintenance management systems software to schedule and track required asset-based activities, and performing regular Operator Qualification training and qualifying."

SECOND FOLLOW-UP INSPECTION: On May 19 2021, Commission Staff reported to the City of Warner Robins to conduct a follow-up inspection of the Operators previously existing probable violations written in the Hazardous Facility Order that falls under inspection number KR20-044. (Ref. Inspection Number KR21-016) Staff did not address this violation in this inspection.

OPERATOR RESPONSE: In their response letter to Inspection Number KR21-016, dated November 23, 2021 the Operator stated: "Complete cathodic protection surveys were performed in 2020 and 2021, and deficiencies noted in the surveys have been addressed. Warner Robins has taken steps to ensure that cathodic protection surveys are being performed timely and properly by contracting with ESG Operations to perform operations and maintenance tasks on its facilities, utilizing computerized maintenance management systems software to schedule and track required asset-based activities. and performing regular Operator Qualification training and qualifying."

THIRD FOLLOW-UP INSPECTION: On August 18, 2021 Pipeline Safety Staff began performing an inspection on the City of Warner Robins' anti-drug and alcohol program for their gas department. On November 22, 2021 Staff reported to Warner Robins to complete the inspection. (Ref. Inspection Number JS21-026) In this inspection Staff stated: "At the time of this inspection the City of Warner Robins Gas Department was under four previously existing probable violations and have two pending consent agreements. Staff did not review these items during the drug & alcohol inspection because they were meeting with the Operator's DER and not gas department personnel."

OPERATOR RESPONSE: In their response letter to Inspection Number JS21-026, dated March 24, 2022 the Operator stated: "Complete cathodic protection surveys were performed in 2020 and 2021, and deficiencies noted in the surveys have been addressed. The 2022 cathodic protection survey is underway. Warner Robins has taken steps to ensure that cathodic protection surveys are being performed timely and properly by contracting with ESG Operations to perform operations and maintenance tasks on its facilities, utilizing computerized maintenance management systems software to schedule and track required asset-based activities, and performing regular Operator Qualification training and qualifying."

FOURTH FOLLOW-UP INSPECTION: On June 24, 2022, Staff requested the City of Warner Robin's Methane Emissions O&M Plans (distribution and transmission), along with documentation to support the plans and other relevant documentation for hazardous leaks and releases of gas. On June 28, 2022, Warner Robins replied with the requested information and Staff began the Inspection on July 11-14, 2022. (Ref. Inspection Numbers DL22-08 and DL22-030) In those inspections Staff stated: "At the time of this inspection, the City of Warner Robins was under six (6) previously existing probable violations and two (2) consent agreements. Staff did not review the existing probable violation at the time of this inspection."

OPERATOR RESPONSE: In their response letter to Inspection Number DL22-028, dated November 21, 2022 the Operator stated: "Complete cathodic protection surveys were performed in 2020 and 2021, and deficiencies noted in the surveys have been addressed. The 2022 cathodic protection survey is underway. Warner Robins has taken steps to ensure that cathodic protection surveys are being performed timely and properly by contracting with ESG Operations to perform operations and maintenance tasks on its facilities, utilizing computerized maintenance management systems software to schedule and track required asset-based activities, and performing regular Operator Qualification training and qualifying."

FIFTH FOLLOW-UP INSPECTION: During this inspection (Inspection Number JB24-001) Staff reviewed records for the operators CY 2021 and 2022 CP surveys which indicate that their systems are now meeting their established criteria.

Staff determined that this violation has been addressed.

4. In regard to the Probable Violation of 49CFR, §40.25(b) which was cited under Inspection Number JS21-026, in that inspection Staff stated: "The City of Warner Robins Gas Department failed to demonstrate that they requested drug & alcohol testing records of a potential employee seeking to perform safety-sensitive functions from previous DOT-regulated employers."

   OPERATOR RESPONSE In their response letter to Inspection Number JS21-026, dated March 16, 2022, the Operator stated: "Warner Robins has requested drug and alcohol testing records for the employee in question from the previous employer, although after the fact, and will ensure in the future that these records are requested appropriately for employees seeking to begin performing safety-sensitive duties for the first time."

   FIRST FOLLOW-UP INSPECTION: On June 24, 2022, Staff requested the City of Warner Robin's Methane Emissions O&M Plans (distribution and transmission), along with documentation to support the plans and other relevant documentation for hazardous leaks and releases of gas. On June 28, 2022, Warner Robins replied with the requested information and Staff began the Inspection on July 11-14, 2022. (Ref. Inspection Numbers DL22-08 and DL22-030) In those inspections Staff stated: "At the time of this inspection, the City of Warner Robins was under six (6) previously existing probable violations and two (2) consent agreements. Staff did not review the existing probable violation at the time of this inspection."

   OPERATOR RESPONSE: In their response letter to Inspection Number DL22-028, dated November 21, 2022 the Operator stated: "Warner Robins has requested drug and alcohol testing records for the employees in question from their previous employer, although after the fact. Documentation will be provided to GPSC Staff. Warner Robins will ensure in the future that these records are requested appropriately for employees seeking to begin performing safety-sensitive duties for the first time."

SECOND FOLLOW-UP INSPECTION: During this inspection (Inspection Number JB24-001) Staff reviewed documentation with the DER that indicated that they have preformed the pre-employment records check required by §40.25.

Staff determined that this violation has been addressed.

5. In regard to the Probable Violation of 49CFR, §199.105(a) which was cited under Inspection Number JS21-026, in that inspection Staff stated: "The City of Warner Robins failed to demonstrate that all of the personnel they hired or contracted to perform safety sensitive functions had passed a drug test or was covered by an anti-drug program that conforms to the requirements of 49CFR, Part 199."

   OPERATOR RESPONSE In their response letter to Inspection Number JS21-026, dated March 16, 2022, the Operator stated: "The City of Warner Robins ("Warner Robins") has performed drug tests on two of the employees in-question per pre-employment parameters, although after the fact. The third individual is no longer employed by Warner Robins. Warner Robins will ensure that pre-employment tests are performed appropriately for new covered employees in the future."

   FIRST FOLLOW-UP INSPECTION: On June 24, 2022, Staff requested the City of Warner Robin's Methane Emissions O&M Plans (distribution and transmission), along with documentation to support the plans and other relevant documentation for hazardous leaks and releases of gas. On June 28, 2022, Warner Robins replied with the requested information and Staff began the Inspection on July 11-14, 2022. (Ref. Inspection Numbers DL22-08 and DL22-030) In those inspections Staff stated: "At the time of this inspection, the City of Warner Robins was under six (6) previously existing probable violations and two (2) consent agreements. Staff did not review the existing probable violation at the time of this inspection."

   OPERATOR RESPONSE: In their response letter to Inspection Number DL22-028, dated November 21, 2022 the Operator stated: "The City of Warner Robins has performed drug tests on two of the employees in-question per pre-employment parameters, although after the fact. The third individual is no longer employed by Warner Robins. Warner Robins will ensure that pre-employment tests are performed appropriately for new covered employees in the future."

   SECOND FOLLOW-UP INSPECTION: During this inspection (Inspection Number JB24-001) Staff reviewed documentation with the DER that indicated that pre-employment testing is now being conducted as required by §199.105(a).

   Staff determined that this violation has been addressed.

PROBABLE VIOLATION CONTINUING

1. In regard to the Probable Violation of 49CFR, §192.181(b) which was cited under Inspection Number KR21-001, in that inspection Staff stated: "The City of Warner Robins failed to install a valve on the inlet piping to the regulator stations at a distance from the regulator station sufficient to permit the operation of the valve during an emergency that might preclude access to the station.

   OPERATOR RESPONSE: In their response to Inspection Number KR21-001, dated May 27, 2021, the Operator stated that: "Warner Robins is performing a condition assessment of each regulator stations to identify deficiencies, including the absence of inlet valves, and is reviewing records for the referenced regulator stations to determine whether any were constructed prior to adoption of this

regulatory requirement. The assessment and review process will be completed by July 21, 2021, after which a capital improvement plan and schedule will be developed for improvements as necessary. Warner Robins will advise GPSC Staff of the installation plan and schedule when they are developed."

FIRST FOLLOW-UP INSPECTION: On March 30, 2021 Staff reported to the City of Warner Robins Gas System to perform a review of the leak survey results for schools from the Operators recent survey. (Ref. Inspection Number JB21-004) In that inspection Staff stated: "At the time of this review the City of Warner Robins Gas System was under four (4) previously existing probable violations, and a consent agreement. Because this review was specifically to address the issue of leak surveys and rechecks at schools related to the Hazardous Facility Order, which was issued under Inspection Number KR20-004, Staff did not review these items.

OPERATOR RESPONSE: In their response letter to Inspection Number JB21-004, dated May 27, 2021 the Operator stated: "Warner Robins is performing a condition assessment of each regulator stations to identify deficiencies, including the absence of inlet valves, and is reviewing records for the referenced regulator stations to determine whether any were constructed prior to adoption of this regulatory requirement. The assessment and review process will be completed by July 21, 2021, after which a capital improvement plan and schedule will be developed for improvements as necessary. Warner Robins will advise GPSC Staff of the installation plan and schedule when they are developed."

SECOND FOLLOW-UP INSPECTION: On May 19 2021, Commission Staff reported to the City of Warner Robins to conduct a follow-up inspection of the Operators previously existing probable violations written in the Hazardous Facility Order that falls under inspection number KR20-044. (Ref. Inspection Number KR21-016) Staff did not address this violation in this inspection.

OPERATOR RESPONSE: In their response letter to Inspection Number KR21-016, dated November 23, 2021 the Operator stated: "Warner Robins has performed a condition assessment of each regulator station to identify deficiencies, including the absence of inlet valves, and is reviewing records for the referenced regulator stations to determine whether any were constructed prior to adoption of this regulatory requirement. The review process will be completed by December 31, 2021, after which a capital improvement plan and schedule will be developed for improvements as necessary. Warner Robins will advise GPSC Staff of the installation plan and schedule when they are developed."

THIRD FOLLOW-UP INSPECTION: On August 18, 2021 Pipeline Safety Staff began performing an inspection on the City of Warner Robins' anti-drug and alcohol program for their gas department. On November 22, 2021 Staff reported to Warner Robins to complete the inspection. (Ref. Inspection Number JS21-026) In this inspection Staff stated: "At the time of this inspection the City of Warner Robins Gas Department was under four previously existing probable violations and have two pending consent agreements. Staff did not review these items during the drug & alcohol inspection because they were meeting with the Operator's DER and not gas department personnel."

OPERATOR RESPONSE: In their response letter to Inspection Number JS21-026, dated March 24, 2022 the Operator stated: " "Warner Robins has performed a condition assessment of each regulator station to identify deficiencies, including the absence of inlet valves, and has reviewed records for the referenced regulator stations to determine whether any were constructed prior to adoption of this regulatory requirement. A capital improvement plan and schedule for necessary improvements has been drafted and is under consideration by Warner Robins. GPSC Staff will be advised of the improvement plan and schedule when they are approved."

FOURTH FOLLOW-UP INSPECTION: On June 24, 2022, Staff requested the City of Warner Robin's Methane Emissions O&M Plans (distribution and transmission), along with documentation to support the plans and other relevant documentation for hazardous leaks and releases of gas. On June 28, 2022, Warner Robins replied with the requested information and Staff began the Inspection on July 11-14, 2022. (Ref. Inspection Numbers DL22-08 and DL22-030) In those inspections Staff stated: "At the time of this inspection, the City of Warner Robins was under six (6) previously existing probable violations and two (2) consent agreements. Staff did not review the existing probable violation at the time of this inspection."

OPERATOR RESPONSE: In their response letter to Inspection Number DL22-028, dated November 21, 2022 the Operator stated: "Warner Robins has performed a condition assessment of each regulator station to identify deficiencies, including the absence of inlet valves, and has reviewed records for the referenced regulator stations to determine whether any were constructed prior to adoption of this regulatory requirement. A capital improvement plan and schedule for necessary improvements has been drafted and is under consideration by Warner Robins. GPSC Staff will be advised of the improvement plan and schedule when they are approved."

FIFTH FOLLOW-UP INSPECTION: During this inspection the Operator advised that they have identified a total of 27 regulator stations that require inlet valves. They have installed two inlet valves and eliminated three stations which leaves a total of 22 inlet valves remaining to be installed. The Operator has submitted a budget plan to the City of Warner Robins to install four inlet valves a year with an estimated completion day of CY2029.

Based on the time frame and expense required to complete this project Staff has recommended that the Director address this item through a Consent Agreement to ensure its completion.

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

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 Warner Robins

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37098

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 Warner Robins Gas System	)	**DOCKET NO. 37098**
	)	
	)	
	)	

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 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 1st day of July 2025:

Cathy Nesbitt

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