COMMISSIONERS

JASON SHAW , Chairman
LAUREN "BUBBA" McDONALD , Vice-Chairman
PETER HUBBARD
ALICIA M. JOHNSON
TRICIA PRIDEMORE

REECE McALISTER
EXECUTIVE DIRECTOR

MICHELLE THEBERT
FACILITIES PROTECTION UNIT DIRECTOR

FILED
MAR 1 2 2026
EXECUTIVE SECRETARY
GPSC

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# 37099
DOCUMENT# 225788

Docket No. 37099

City of Waynesboro Gas Dept.
615 N Liberty Street
Waynesboro, GA 30830

☐ Certified Mail ☐ Regular Mail

Attention: Valerie Kirkland

On October 6, 2025, a representative of the Georgia Public Service Commission Pipeline Safety/Facilities Protection Office conducted a review of the terms of your Consent Agreement and found that the previously agreed upon items have either been addressed, or are continuing, as identified below.

☐ Consent Agreement complied with - All provisions have been completed

☒ Consent Agreement has not yet been complied with

- ☒ Operator is still working to address the provisions of the Consent Agreement / Staff to schedule followup based on Operators response to this inspection.
- ☐ Operator has addressed the provisions of the Consent Agreement / Monitoring by Staff will continue as required under the terms of the Consent Agreement.

☐ Consent Agreement not complied with - Additional Enforcement

- ☐ Notice of Proposed Violation with Proposed Civil Penalty
- ☐ Notice of Proposed Violation
- ☐ Warning Letter
- ☐ Letter of Concern
- ☐ Observed Issue

The enclosed inspection report numbered JS25-034 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. 37099 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 L. Thebert
Director, Office of Pipeline Safety/Facilities Protection

COMMISSIONERS

JASON SHAW , Chairman
LAUREN "BUBBA" McDONALD , Vice-Chairman
PETER HUBBARD
DR. ALICIA M. JOHNSON
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: JS25-034

OPERATOR: City of Waynesboro Gas Dept.

INVESTIGATOR: Jason Smith

INSPECTION DATE: October 6, 2025 REPORT MAILED DATE: March 11, 2026

Any questions concerning this report may be directed to the above address or by telephoning (404) 463-6526.

1. PURPOSE OF INSPECTION

To follow-up on the Operator's previously existing consent agreement.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
Under Consent Agreement	Operator is under a Consent Agreement.	DL20-025	6/30/2020
199.227	Retention of records.	JS25-003	1/27/2025
199.117	Recordkeeping	JS25-003	1/27/2025
192.287	Plastic pipe; inspection of joints.	JS25-035	9/29/2025
192.739	Pressure limiting and regulating stations: Inspection and testing.	JS25-035	9/29/2025
192.615(b)(2)	Train the appropriate operating personnel to assure that they are knowledgeable of the emergency...	JS25-035	9/29/2025
192.465(b)	Each cathodic protection rectifier or other impressed current power source must be inspected six...	JS25-035	9/29/2025
192.465(d)	Each operator shall take prompt remedial action to correct any deficiencies indicated by the...	JS25-035	9/29/2025
192.465(a)	Each pipeline that is under cathodic protection must be tested at least once each calendar year...	JS25-035	9/29/2025
192.195(a)	General requirements. Except as provided in §192.197, each pipeline that is connected to a gas...	JS25-035	9/29/2025
192.473(b)	Each impressed current type cathodic protection system or galvanic anode system must be designed...	JS25-035	9/29/2025
192.479(a)	Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the...	JS25-035	9/29/2025
192.285(a)	No person may make a plastic pipe joint unless that person has been qualified under the applic...	JS25-035	9/29/2025
192.625(f)	To assure the proper concentration of odorant in accordance with this section, each operator must...	JS25-035	9/29/2025
515-9-5-.01	Emergency Procedures	JS25-035	9/29/2025

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

On October 6, 2025, Pipeline Safety Staff reported to the City of Waynesboro to perform a comprehensive inspection on the Natural Gas System's plans records and facilities. While on site Staff followed up with the status of a consent agreement they are currently under with the Commission.

At the time of this inspection the Operator was represented by:
Everett Rhodes - Gas Superintendent
Chris Cawley - MGAG/SRCS (consultant)

Commission Staff were represented by:
Jason Smith - Lead Inspector
Glen Murphy - Pipeline Safety Inspector
Brian Withrow - Pipeline Safety Inspector
Joe Jones - Pipeline Safety Inspector

At the time of this inspection the City of Waynesboro Natural Gas System had no previously existing probable violations but was under a consent agreement from Inspection Number JL13-012.

During this Follow-Up Inspection (Inspection Number JS25-034), Staff found that on July 31, 2019, the City of Waynesboro signed a Consent Agreement with the Commission to address the probable violation of 49 C.F.R. §192.13(c) and proposed civil penalty of Fifteen Thousand Dollars ($15,000.00) which was cited in Inspection Number JL13-012. Staff found that there were four (4) items in the consent agreement, and that two (2) of these items (Item 3 and Item 4) had already been addressed. Staff reviewed each of the remaining items from the Consent Agreement and determined the following:

a) Consent Item 1 - Waynesboro shall send two employees to the Georgia Pipeline Safety Seminar in Macon beginning in 2020 for the next three (3) years at an estimated cost of $1000 per person per year.

   FIRST FOLLOW-UP INSPECTION: On September 20, 2020, Staff conducted a follow-up inspection to monitor the City of Waynesboro's compliance with the terms of their Consent Agreement related to probable violations and proposed civil penalties from Inspection Numbers AT17-036 and JL13-012. (Ref. Inspection Number DL20-034) In that inspection Staff stated:

   "During this inspection (DL20-025) Staff determined that due to the Covid 19 conditions, the Georgia Pipeline Safety Seminar did not take place and this item could not take place.

   Staff determined that the Operator has not yet complied with the terms of the consent agreement regarding this item."

   OPERATORS FIRST RESPONSE: The City of Waynesboro did not respond to Inspection Number DL20-034.

   SECOND FOLLOW-UP INSPECTION: On February 20. 2023, Staff reported to the City of Waynesboro Natural Gas System to conduct a follow-up inspection of the Operators previously existing probable violations. (Ref. Inspection Number DL23-007) In that inspection Staff stated:

   "During this inspection (DL23-007) Staff determined that this item cannot be corrected until the 2023 Georgia Pipeline Safety Seminar in Macon."

   OPERATORS SECOND RESPONSE: The City of Waynesboro did not respond to Inspection Number DL23-007.

THIRD FOLLOW-UP INSPECTION: On January 30, 2025, Pipeline Safety Staff reported to the City of Waynesboro to perform an inspection on the Natural Gas System's drug and alcohol program. While on site Staff followed up with the status of a consent agreement they are currently under with the Commission. (Ref. Inspection Number JS25-002) In that inspection Staff stated:

"During this inspection (Inspection Number JS25-002) the Operator informed Staff that their Gas Superintendent, Everett Rhodes has been attending the Pipeline Safety Seminar. They provided an e-mail verification from the Georgia Municipal Association's Deputy Director of Conferences & Management Services, stating Everett Rhodes has attended the seminar every year since 2013. The Georgia Municipal Association also informed Staff that in 2022, two other people did accompanied Everett Rhodes to the seminar. The City of Waynesboro Natural Gas has not been able to demonstrate a second person also attended the Georgia Pipeline Safety Seminar in Macon with the Gas Superintendent for all three years.

The Operator is advised that failing to complete this requirement at the next scheduled pipeline safety seminar will result in an evaluation by the Director to determine if the City of Waynesboro should be scheduled for a hearing with the Commission to determine if they should be subject to additional enforcement for failing to comply with a Commission order.

Staff determined that Consent Item 1 has not been fully addressed."

OPERATORS THIRD RESPONSE: At the time of this inspection (Inspection Number JS25-034) the Operator had not received Inspection Number JS25-002, therefore they had not had the opportunity to respond.

FOURTH FOLLOW-UP INSPECTION: During this inspection (Inspection Number JS25-034) the Operator informed Staff that in addition to the gas superintendent attending the 2025 Pipeline Safety Seminar, Waynesboro sent Ms. Emma Mullis, front office Administrative Assistant. The Operator provided a copy of the certificate of attendance for Emma Mullis and the Gas Superintendent.

If Waynesboro continues sending two people to the seminar for the next two years, the consent agreement item will be fully addressed after the 2027 Pipeline Safety Seminar.

At this time Consent Item 1 has not been fully addressed.

b) Consent Item 2 - Waynesboro shall send one employee to the Drug and Alcohol class offered by Staff during the next three Pipeline Safety Seminars beginning in 2020 at an estimated cost of $500.00 per year.

FIRST FOLLOW-UP INSPECTION: On September 20, 2020, Staff conducted a follow-up inspection to monitor the City of Waynesboro's compliance with the terms of their Consent Agreement related to probable violations and proposed civil penalties from Inspection Numbers AT17-036 and JL13-012. (Ref. Inspection Number DL20-034) In that inspection Staff stated:

"During this inspection (DL20-025) Staff determined that due to the Covid 19 conditions, the Georgia Pipeline Safety Seminar did not take place and this item could not take place.

Staff determined that the Operator has not yet complied with the terms of the consent agreement regarding this item."

OPERATORS FIRST RESPONSE: The City of Waynesboro did not respond to Inspection Number DL20-034.

SECOND FOLLOW-UP INSPECTION: On February 20. 2023 Staff reported to the City of Waynesboro Natural Gas System to conduct a follow-up inspection of the Operators previously existing probable violations. (Ref. Inspection Number DL23-007) In that inspection Staff stated:

"During this inspection (DL23-007) Staff determined that this item cannot be corrected until the 2023 Georgia Pipeline Safety Seminar in Macon.

Staff determined that this item has not been addressed."

OPERATORS SECOND RESPONSE: The City of Waynesboro did not respond to Inspection Number DL23-007..

THIRD FOLLOW-UP INSPECTION: On January 30, 2025, Pipeline Safety Staff reported to the City of Waynesboro to perform an inspection on the Natural Gas System's drug and alcohol program. While on site Staff followed up with the status of a consent agreement they are currently under with the Commission. (Ref. Inspection Number JS25-002) In that inspection Staff stated:

"During this inspection (JS25-002) the Operator informed Staff that they did not have documented verification that anyone, including their Gas Superintendent attended the Drug and Alcohol class offered by Pipeline Safety Staff during the Pipeline Safety Seminars in Macon.

The Operator is advised that failing to complete this requirement at the next scheduled pipeline safety seminar will result in an evaluation by the Director to determine if the City of Waynesboro should be scheduled for a hearing with the Commission to determine if they should be subject to additional enforcement for failing to comply with a Commission order.

Staff determined that Consent Item 2 has not been addressed."

OPERATORS THIRD RESPONSE: At the time of this inspection (Inspection Number JS25-034) the Operator had not received Inspection Number JS25-002, therefore they had not had the opportunity to respond.

FOURTH FOLLOW-UP INSPECTION: During this inspection (Inspection Number JS25-034) the Operator informed Staff that Ms. Emma Mullis, front office Administrative Assistant attended the April 7, 2025 '2 Hours of Training on Drug & Alcohol Awareness' for Part 199 class. Waynesboro Natural Gas System supplied the certificate of attendance for Ms. Mullis.

If Waynesboro continues sending someone to the Drug & Alcohol class offered at the Pipeline Safety Seminar for the next two years, the consent agreement item will be fully addressed after the 2027 Pipeline Safety Seminar.

At this time Consent Item 2 has not been fully addressed.

Staff determined that this Consent Agreement cannot 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

Informal Conference Requested: Yes ☐ No ☐

Operator Name: City of Waynesboro Docket Number: 37099

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	Proposed Penalty for this violation
☐ 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 Waynesboro Gas Department	)	**DOCKET NO. 37099**
	)	
	)	
	)	

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

*Valerie Kirkland, City Manager
City of Waynesboro Gas Department
615 N. Liberty Street
Waynesboro, GA 30830
vkirkland@waynesboroga.com

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

Respectfully Submitted this _____ day of March 2026:

Cathy Nesbitt

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