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Atlanta, GA 30334-5701

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Docket No. 37049

DOCKET# 37049
DOCUMENT# 225791

City of Eatonton
P. O. Box 3820
Eatonton, GA 31024
DELIVERED VIA E-MAIL

RE: Inspection Report JS25-038

Dear Mr. Gary Sanders -

Based on review of City of Eatonton's response, discussions with Pipeline Safety Staff and/or Operator, and/or any additional information provided for Inspection , I have cleared the following Enforcement Actions:

Any new or continuing Enforcement Action(s) not listed above will be addressed during the Operator's future inspection. No action is required by City of Eatonton at this time.

Please let me know if there are any questions or concerns regarding this correspondence at (404) 985-4271 or mthebert@psc.ga.gov. Thank you for your continuing contribution toward increased pipeline safety.

Sincerely,

Michelle Thebert
Director, Office of Pipeline/Facilities Safety

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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: JS25-038

OPERATOR: City of Eatonton

INVESTIGATOR: Jason Smith

INSPECTION DATE: July 22, 2025 REPORT MAILED DATE: March 10, 2026

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 review of the Operator's Distribution Integrity Management Plan (DIMP) for compliance with the minimum federal standards in 49CFR Part 192, SubPart P.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.181(a)	Each high-pressure distribution system must have valves spaced so as to reduce the time to...	AT21-025	9/20/2021
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	AT23-003	1/10/2023
515-9-3-.09	Response Options Open to the Operator	AT23-003	1/10/2023

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

On July 22, 2025, Pipeline Safety Staff obtained the City of Eatonton's Distribution Integrity Management Plan (DIMP) version 5.1.3, and on July 23, 2025, Staff began performing an Annual Review of the DIMP. On December 1, 2025, Staff picked back up the review of Eatonton's DIMP version 5.1.3 (generated 2023-01-05)

During this inspection the Operator was represented by:
Gary Sander – City Administrator
Charles Bales – Gas Superintendent
Wade Sharp – MGAG/SRCS (Consultant)

This review was conducted by:
Jason Smith - Lead Inspector
Brian Withrow - Pipeline Safety Inspector
Ed Luebke - Pipeline Safety Inspector

On December 16, 2025, while on a Teams meeting with Eatonton Gas, Staff was informed by the Operator that version 5.1.3 was not their current plan. The City of Eatonton then provided Staff with their DIMP version 6.0 (generated 2024-07-02).

At the time of this inspection the City of Eatonton had an existing probable violation under #AT21-025; one under #AT23-003 and a pending consent agreement. These items were not reviewed during this DIMP review.

During this inspection, Staff utilized ten years of annual 7100 reports, PHMSA Portal Operator Dashboard data and the PHMSA Gas Distribution Integrity Management (DIMP) Inspection form to aid in the review of the City of Eatonton's DIMP.

OBSERVED ISSUES

As a result of this review Staff identified potential deficiencies with the City of Eatonton's Distribution Integrity Management Plan version 6.0, specifically:

1. Section 11.4 'Description Of The Process Followed To Develop This Plan' under #4 'Validate Risk Rankings' it states: "You should not automatically accept SHRIMP's order of risk ranking. Review it, consider the summary description of why SHRIMP ranked each threat and, if you disagree with the order, rearrange the order of threats as you believe it should be, and be sure to enter a description of what factors you considered that led you to change the order."

   In section 5.2 'Risk Ranking' the threat 'Cathodic Protected, Bare Steel' was ranked #2 on the list, but SHRIMP ranked this threat #6. There was no explanation of the factors that led Eatonton to believe this threat justified a higher ranking on the list.

2. Section 11.2 'List of Answers from SHRIMP Interviews' under the 'System Information' section, Staff noticed data in the following tables were actually pulled from the City of Eatonton's 2018 annual 7100 reports:

General System Description (PART B1)
Mains By Size (PART B2)
Services By Size (PART B3)
System Description By Decades In Service
Part C - Total Leaks and Hazardous Leaks Eliminated/Repaired During The Year

When the City of Eatonton performed the 5-year re-evaluation of their DIMP on July 2, 2024, to bring it from 5.1.3 to version 6.0, all the information within these tables should have been updated to 2023 information.

3. Section 11.2 'List of Answers from SHRIMP Interviews' under the 'Incorrect Operations' threat table that states: "How many leak repairs resulting from incorrect operations occurred during the years shown?" 2019 indicates 1 under service, but Staff did not find this on the City of Eatonton's 2019 annual 7100 report.

4. Section 11.2 'List of Answers from SHRIMP Interviews' under the 'Incorrect Operations' threat; the sub-threat 'Failure To Follow Procedures (Welding-Entire System)' has a table which illustrates the number of pipeline failure due to a failure to follow procedures for a period of 10-years. The table has two columns, one for the year and one for the number of failures. As of December 22, 2025, Eatonton's DIMP version 6.0 does not show the years.

Year	Failures
0	2
0	1
0	0
0	0
0	*2*
0	*1*
0	1
0	0
0	1
0	0

In addition, Staff believes two of these rows may have incorrect data. Eatonton's 2018 annual 7100 report list one hazardous leak on a service due to 'Incorrect Operations' while the table shows 2 and their 2019 annual 7100 report list none, while the table shows 1.

5. Chapter 4 'Threat Assessment' Section 4.2.4 'Incorrect Operations' all four sub-categories:

Due to Drugs & Alcohol

Failure To Follow Procedure
Welding, Inadequate Procedures and
Operator Qualification Revocation

All four sub-categories state the threat indicators are not present / none are found, but the Operator's annual 7100 reports show leaks due to 'Incorrect Operations' in 2014 (2), 2015 (1), 2018 (1), 2020 (1) and 2022 (1). The City of Eatonton explained to Staff that they attribute these leaks to incorrect operations that occurred prior to Operator Qualifications becoming a part of the federal code.

Staff recommends the Operator reconsider this explanation, because the OQ rule became effective on October 26, 1999, while the Integrity Management Program for Gas Distribution Pipelines rule became effective on February 2, 2010.

Staff still questions if section 4.2.4 should state no threat indicators found or present, especially since 'Incorrect Operations - Failure to Follow Procedures: Welding' was added as threat #13 to their DIMP version 6.0. It was not a threat in Eatonton's previous DIMP ver. 5.1.3.

6. Section 11.3 'List of Data Sources from SHRIMP Interviews' list a repetitive (generic) list of data sources used during the threat assessment which include: operator system knowledge, annual 7100 reports, work orders and annual inspections.

   Eatonton's previous DIMP version 5.1.3 listed more specific data sources for each of the threats, when possible, for example:

   'Atmospheric Corrosion' threat should maybe also refer to atmospheric corrosion inspection records / reports and leak repair records

   'External Corrosion – Cathodic Protected, Bare Steel' threat should maybe also refer to Operator management current replacement program until all bare steel has been removed from the system and CP surveys

   'Internal Corrosion' threat should maybe also refer to work orders documenting inspection of where any steel pipe that is removed from a pipeline for any reason, Gas Analysis reports

   'Equipment Failure – Regulator/Relief Valves: Fisher/046 (meter sets)' threat should maybe also refer to leak surveys, CP surveys

   'Excavation - Third Party Damages' threat should maybe also refer to the one-call system ticket information / damage reports caused by excavation

   'Incorrect Operations - Failure to Follow Procedures - Welding' threat should maybe also refer to operator qualification records, incident/accident investigations

'Natural Forces - Flooding - Murder Creek, Cedar Creek & Little River' threat should maybe also refer to patrolling records.

'Other Outside Forces' threat should maybe also include incident reports, failure investigations, patrolling records, leak surveys

7. The City of Eatonton's current DIMP version 6.0 added 'Equipment Malfunction - Failing Equipment: Regulators/Relief Valves: Fisher / 046 (meter set regulators)' as the #6 threat. Staff noticed the difference between the current threat and 'Equipment Malfunction Regulators Prone To Failure (American, 113, 3/16" orifice)' which was #7 in the Operator's previous DIMP version 5.1.3.

   Since this is not listed as a threat in Eatonton's current DIMP version 6.0, Staff questions if the Operator has successfully removed all of these American 113, 3/16" orifices regulators out of their system

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 Eatonton

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37049

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 Eatonton Gas System	)	**DOCKET NO. 37049**
	)	
	)	
	)	

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

*Gary M Sanders, City Administrator
City of Eatonton Gas System
P.O. Box 3820
Eatonton, GA 31024
gsanders@eatontonga.us

*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