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Docket No. 37099

DOCKET# 37099
DOCUMENT# 225792

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

REF: Comprehensive Inspection # JS25-035

☒ Certified Mail ☐ Regular Mail ☐ Email

Attention: Valerie Kirkland

On September 29, 2025, a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an inspection of your gas system. The enclosed inspection report numbered JS25-035 is provided for your information and file.

In conjunction with this inspection report, Staff has recommended the following enforcement(s):

Enforcement Action:

- ☒ Notice of Probable Violation
- ☒ Notice of Probable Violation with Proposed Civil Penalty
- ☐ Notice of Amendment

Enforcement Letter:

- ☒ Warning Letter
- ☒ Letter of Concern

Enforcement Notification:

- ☐ Observed Issue
- ☐ No Violation

Please review and respond to this report in accordance with the attached Instructions for Responding to Enforcement Actions, Enforcement Letters, and Notifications Issued by the Georgia Public Service Commission. Please refer to Docket No. 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 Thebert

Michelle L. Thebert
Director, Office of Pipeline Safety/Facilities Protection

COMMISSIONERS

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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: JS25-035

OPERATOR: City of Waynesboro Gas Dept.

INVESTIGATOR: Jason Smith

INSPECTION DATE: September 29, 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 conduct a comprehensive inspection of the Operator's plans, programs, procedures, pipeline, and pipeline facilities for compliance with the minimum federal safety standards in 49CFR Parts 191 and 192.

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

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
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

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

On September 30, 2025, Pipeline Safety Staff began reviewing the City of Waynesboro Natural Gas System's Operations & Maintenance manual utilizing the Georgia's / PHMSA comprehensive inspection form. On October 6 - 9, and 27 - 28, 2025, Staff reported to the City of Waynesboro to perform the comprehensive inspection of the natural gas systems procedures, records and facilities.

During this inspection the Operator was represented by:
Everett Rhodes - Gas Superintendent
Melvyn Verdree – Gas Technician
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. This matter was addressed under Inspection Number JS25-034.

NOTICE OF PROBABLE VIOLATION

As a result of this inspection Staff found that the City of Waynesboro Natural Gas System was in probable violation of the minimum federal safety standards; specifically:

1. 49CFR §192.465 - External corrosion control: Monitoring and remediation.
   (d) Each operator must promptly correct any deficiencies indicated by the inspection and testing required by paragraphs (a) through (c) of this section. For onshore gas transmission pipelines, each operator must develop a remedial action plan and apply for any necessary permits within 6 months of completing the inspection or testing that identified the deficiency. Remedial action must be completed promptly, but no later than the earliest of the following: prior to the next inspection or test interval required by this section; within 1 year, not to exceed 15 months, of the inspection or test that identified the deficiency; or as soon as practicable, not to exceed 6 months, after obtaining any necessary permits.

   Inspection form question #11. Correction of Corrosion Control Deficiencies states:
   Do records adequately document actions taken to correct any identified deficiencies in corrosion control?

   STAFFS COMMENTS: The Operator's 2020 and 2021 CP surveys contained recommendations from their cathodic protection specialist stating Waynesboro Natural Gas should insert the service at 112 5th Street with plastic pipe since the off readings were below the -.850 criteria.

2020 CP survey: 112 5th Street	On Reading: -0.858 Off Reading: -0.667
2021 CP survey: 112 5th Street	On Reading: -0.992 Off Reading: -0.819

   In 2022 112 5th Street was placed on the Isolated Service monitoring list; with On Reading of -1.213 and Off Read 'No Drop'. It remains on the isolated service list in the 2023 - 2025 CP surveys. The

Waynesboro Gas Superintendent informed Staff that the service was not inserted with plastic pipe or isolated from the steel gas main. An anode was dropped on this service.

Staff has additional concerns about this requirement and will be following up with a data request to determine if any additional enforcement actions should be initiated.

PROBABLE VIOLATION: The City of Waynesboro Natural Gas System failed to correct deficiencies in their corrosion control indicated by required inspection and testing.

2. §192.465 External corrosion control: Monitoring and remediation.
   (a) Each pipeline that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of §192.463. However, if tests at those intervals are impractical for separately protected short sections of mains or transmission lines, not in excess of 100 feet (30 meters), or separately protected service lines, these pipelines may be surveyed on a sampling basis. At least 10 percent of these protected structures, distributed over the entire system must be surveyed each calendar year, with a different 10 percent checked each subsequent year, so that the entire system is tested in each 10-year period.

   Inspection Form Question #8. Cathodic Protection Monitoring states:
   Do records adequately document cathodic protection monitoring tests have occurred as required?

   STAFFS COMMENTS: While reviewing five-years of the Operator's cathodic protection survey records (2020 - 2025) in 2022 through 2025 the only location listed on the 'Isolated Services' sheet was 112 5th Street.

   Staff then reviewed appendix K-1 'Isolated Structure Monitoring' list from Waynesboro's Operations & Maintenance manual and found it contained approximately 38/39 locations, of which approximately 12 of the locations were either replaced with plastic or retired. That leaves around 26/27 locations on the 'Isolated Structure Monitoring' list.

   Staff asked the Operator if they had documentation showing the 26/27 isolated services had been annually inspected. Waynesboro Natural Gas System could not provide documentation demonstrating they inspected these isolated structures.

   PROBABLE VIOLATION: The City of Waynesboro Natural Gas System failed to demonstrate that each of their pipelines that is under cathodic protection has been tested at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of §192.463.

3. 49CFR §192.473 - External corrosion control: Interference currents.
   (b) Each impressed current type cathodic protection system or galvanic anode system must be designed and installed so as to minimize any adverse effects on existing adjacent underground metallic structures.

   Inspection form question #17. Interference Currents states:

Do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?

STAFFS COMMENTS: During this inspection, Staff reviewed Waynesboro Natural Gas System's cathodic protection records from 2020 through 2025. Staff found there were no pipe-to-soil readings to verify the adverse effects from Waynesboro's CP systems on to other adjacent underground metallic structures.

PROBABLE VIOLATION: The City of Waynesboro Natural Gas System failed to ensure that their cathodic protection system is not having an adverse effect on existing adjacent underground metallic structures.

4. 49CFR, §192.615 Emergency plans.
   (b) Each operator shall:
      (2) Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective.

Inspection Form Question # 7. Emergency Response Training states:
Has the operator trained the appropriate operating personnel on emergency procedures and verified that the training was effective in accordance with its procedures?

STAFFS COMMENTS: Waynesboro's Emergency Procedures Manual section IX. 'Acquainting Appropriate Operating and Maintenance Personnel with Procedures' 2) states:

> *"The Gas Superintendent, or his/her designee, is responsible for ensuring that Operations and Maintenance personnel who perform emergency response activities are trained in the contents of this manual and are knowledgeable of the requirements contained therein. Particular attention should be paid to new operating personnel; these persons will receive training in in this manual prior to actions requiring the use of procedures contained therein. Additional training for all personnel shall be provided as outlined in paragraph 4 of this section below."*

Section 2, Item 3 of the procedure also references appendix P 'Verification of Emergency Manual Training' which is a sheet that shows what employees received the training. The only completed Emergency Manual Training sheet Staff found was completed in October 2017. Waynesboro's Gas Superintendent informed Pipeline Safety Staff that the current gas employee has been with them for approximately two and a half years. There's no documentation this employee has received Emergency Manual Training.

PROBABLE VIOLATION: The City of Waynesboro Natural Gas System failed to demonstrate that they trained their operating personnel to ensure they are knowledgeable of emergency plan procedures.

5. 49CFR, §192.625 Odorization of gas.
   (f) To assure the proper concentration of odorant in accordance with this section, each operator must conduct periodic sampling of combustible gases using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable.

Inspection Form Question #16. Odorization of Gas states:
Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?

STAFFS COMMENTS: In the Waynesboro's Operations & Maintenance procedures manual, Section 12-U, 'Odorization of Gas' item (c) states:

> *"City of Waynesboro will assure the proper concentration of odorant in accordance with this Section by conducting quarterly, not to exceed 120 days, or more frequent sampling of combustible gases using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable." This section also includes a reference to OQ Procedure 1211 - Odorization – Periodic Sampling, which states that: "Each instrument used for periodic odorization sampling shall be operated and maintained in accordance with the manufacturer's recommended operating instructions."*

During this inspection, Staff reviewed documentation of the Operator's periodic sampling of their odorant. Staff noted that the City of Waynesboro Natural Gas System has no records of odorant sampling from CY 2020 until current date (October 2025). The Operator has not conducted periodic sampling of their odorant for each quarter, not to exceed 120 days, as stated in the Operator's procedure.

Staff also found that the City of Waynesboro Natural Gas Systems odorometer has been out of calibration since 6/30/2023.

PROBABLE VIOLATION: The City of Waynesboro Natural Gas System failed to demonstrate that they have assured the proper concentration of odorant in their system by conducting periodic sampling of combustible gases using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable, as required by §192.615(f) and their Operations and Maintenance procedures.

6. 49CFR, §192.195 Protection against accidental overpressuring.
   (a) General requirements. Except as provided in § 192.197, each pipeline that is connected to a gas source so that the maximum allowable operating pressure could be exceeded as the result of pressure control failure or of some other type of failure, must have pressure relieving or pressure limiting devices that meet the requirements of §§ 192.199 and 192.201.

Inspection Form Question #43. Protection against Accidental Overpressuring states:
Do records indicate that the pipeline has pressure relieving or pressure limiting devices that are required by 192.195(a), and that they meet the requirements of 192.199 and 192.201?

STAFFS COMMENTS: While reviewing the 2020-2024 records for inspecting their regulator stations, Staff noticed that the Highway 56 Tap Station relief valve was listed as a 1-inch Fisher 289H, set to relieve at 40psi. The wide-open regulator capacity for this relief valve was calculated at 13.85MCFH. During a field visit of this location, Staff found the relief valve was not a Fisher 289H as noted on the records, but a Fisher 1805 series relief valve. This Fisher 1805 series relief valve capacity was not determined by the Operator.

On October 28, 2025, the Operator had a Fisher 289H relief valve installed on the regulator station.

PROBABLE VIOLATION: The City of Waynesboro Natural Gas System records failed to properly document if the pressure relieving device on their regulator station could provide protection against accidental over pressurization.

7. 49CFR, §192.465 External corrosion control: Monitoring and remediation.
(b) Cathodic protection rectifiers and impressed current power sources must be periodically inspected as follows:
(1) Each cathodic protection rectifier or impressed current power source must be inspected six times each calendar year, but with intervals not exceeding 2 ½ months between inspections, to ensure adequate amperage and voltage levels needed to provide cathodic protection are maintained. This may be done either through remote measurement or through an onsite inspection of the rectifier.

Inspection Form Question #17. Rectifier or other Impressed Current Sources states:
Do field observations confirm impressed current sources are properly maintained and are functioning properly?

STAFFS COMMENTS: Waynesboro's Operations & Maintenance section 9-G 'External Corrosion Control - Monitoring and Remediation' (b) states:

"Each cathodic protection rectifier or other impressed current power source will be inspected at least six times each calendar year, but with intervals not exceeding 2½ months, to ensure that it is operating. This may be done either through remote measurement or through an onsite inspection of the rectifier."

and (d) states:

"City of Waynesboro will take prompt remedial action to correct any deficiencies indicated by the inspection and testing required by paragraphs (a), (b), and (c) above.
(1)...
(2) Remedial action should correct the deficiency before the next required monitoring cycle required. However, if remedial action cannot be completed prior to the next scheduled monitoring cycle, City of Waynesboro will develop, document, and follow a written plan the actions taken to correct the deficiency and state the expected timeframe for completion."

During this inspection Staff visited the Highway 56 rectifier on October 9, 2025, and found it was not operating at the time. Staff asked the Operator how long this rectifier was down, but they were unable to provide that information at the time. The Operator went back to their office to check their records and found the rectifier was last physically inspected during the annual Cathodic Protection survey on June 24, 2025. Then they checked their remote monitoring unit (RMU) system which appears to indicate the rectifier went offline after July 2025.

The rectifier should have been inspected, at least 2 ½ months from the last inspection date which would have made the next time for its inspection around September 10-13, 2025. Waynesboro missed at least two opportunities to recognize a problem with their Highway 56 rectifier but only discovered the issue upon Pipeline Safety Staff's inspection.

PROBABLE VIOLATION: The City of Waynesboro Natural Gas System failed to inspect their cathodic protection rectifier six times each calendar year, but with intervals not exceeding 2 ½ months between inspections, to ensure adequate amperage and voltage levels needed to provide cathodic protection are maintained.

8. 49CFR, §192.739 Pressure limiting and regulating stations: Inspection and testing.
   (a) Each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is—
   (1) In good mechanical condition;
   (2) Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed;
   (3) Except as provided in paragraph (b) of this section, set to control or relieve at the correct pressure consistent with the pressure limits of § 192.201(a); and
   (4) Properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.

   Inspection Form Question #38. Pressure Limiting and Regulating Stations Inspection and Testing states:
   Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?

   STAFFS COMMENTS: On October 8, 2025, Staff visited the Highway 56 Tap Station and found a Fisher 1805 series relief valve on this regulator station, but the Operator's records indicate a 1-inch Fisher 289H relief on this station. The records document a 289H relief valve set at 40psi, with a wide-open capacity calculated at 13.85MCFH. Staff questions how the Operator's inspection of this regulator station and relief is adequate when their records contain inaccurate information.

   PROBABLE VIOLATION: The City of Waynesboro Natural Gas System failed to demonstrate that the inspection and testing of their regulator station and relief devices for adequate capacity and reliability of operation was sufficient to ensure compliance with the requirements of §192.195 and §192.739.

WARNING LETTER

1. 49CFR, §192.479 Atmospheric corrosion control: General.
   (a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.

   Inspection Form Question #22. Atmospheric Corrosion states:
   Do records document the protection of above ground pipe from atmospheric corrosion?

   STAFFS COMMENTS: Waynesboro's Operation & Maintenance manual section 9-P 'Atmospheric Corrosion Control – Monitoring' (d) states: If no atmospheric corrosion is found but the facility's coating is loose, cracked, damaged, absent, raised, blistered, or flaking, City of Waynesboro will take necessary steps to clean facilities by brushing, scraping, etc., and to paint or re-coat these facilities before atmospheric corrosion takes place.

While reviewing records Staff found:

- 2020 atmospheric corrosion inspection list survey called for test station at 833 MLK to be painted.
- 2021 atmospheric corrosion inspection list called for the 833 MLK test station to be painted due to light surface rust.
- 2023 and 2024 atmospheric corrosion inspection list 405 4th Street, 405 Victory Drive and 524 Shadrack St was in need of paint.
- 2023, 2024 and 2025 atmospheric corrosion inspection list 793 Hwy 56 South, 502 Academy Avenue, 206 8th Street, and 241 7th Street was in need of paint.

PROBABLE VIOLATION: The City Waynesboro Natural Gas System failed to clean and coat each portion of their pipeline that is exposed to the atmosphere as required by their procedure.

2. 49CFR, §192.285 Plastic pipe: Qualifying persons to make joints.
(a) No person may make a plastic pipe joint unless that person has been qualified under the applicable joining procedure by:
(1) Appropriate training or experience in the use of the procedure; and
(2) Making a specimen joint from pipe sections joined according to the procedure that passes the inspection and test set forth in paragraph (b) of this section.

Inspection Form Question #34. Plastic Pipe - Qualifying Personnel to Make Joints states:
Do records indicate persons making joints in plastic pipelines are qualified in accordance with §192.285?

STAFFS COMMENTS: During this inspection Staff reviewed the Operator's records for personnel making joints in plastic pipelines and discovered the following:

- Everett Rhodes qualification for task #0711 'Joining of Pipe – Compression Couplings' expired Dec. 7, 2023.
- Everett Rhodes qualification for task #0751 - 0761 'Joining of Plastic Pipe – Butt Heat Fusion' expired March 18, 2017.
- Everett Rhodes qualification for task #0781 'Joining of Plastic Pipe – Electrofusion' expired June 24, 2022.

Staff confirmed with the Operator that the qualifications for these three tasks should have been kept up to date by personnel as they do get utilized.

Staff has additional concerns about this requirement and will be following up with a data request to determine if any additional enforcement actions should be initiated.

PROBABLE VIOLATION: The City of Waynesboro Natural Gas System failed to ensure that their personnel making plastic pipe joints have been qualified under an applicable joining procedure.

3. 49CFR, §192.287 Plastic pipe: Inspection of joints.
No person may carry out the inspection of joints in plastic pipes required by §§ 192.273(c) and 192.285(b) unless that person has been qualified by appropriate training or experience in evaluating the acceptability of plastic pipe joints made under the applicable joining procedure.

Inspection Form Question #35. Qualification of Personnel Inspecting Joints in Plastic Pipelines states:

Do records indicate persons inspecting the making of plastic pipe joints have been qualified?

STAFFS COMMENTS: In the Waynesboro's Operations & Maintenance section 6-G 'Plastic Pipe: Inspection of Joints' it states:

(a) No person may carry out the inspection of joints in plastic pipes required by Sections 6-A(c) and 6-F(b) unless that person has been qualified by appropriate training or experience in evaluating the acceptability of plastic pipe joints made under the applicable joining procedure.
(b) Any person who holds a current qualification to make joints in plastic pipelines is also qualified to inspect joints in plastic pipelines. Authorization to inspect such joints will be granted at the discretion of City of Waynesboro.

During this inspection Staff reviewed the Operator's records for personnel making joints in plastic pipelines and discovered the following:

- Everett Rhodes qualification for task #0711 'Joining of Pipe – Compression Couplings' expired Dec. 7, 2023 (in OQ Keeper database).
- Everett Rhodes qualification for task #0751 - 0761 'Joining of Plastic Pipe – Butt Heat Fusion' expired March 18, 2017 (in OQ Keeper database).
- Everett Rhodes qualification for task #0781 'Joining of Plastic Pipe – Electrofusion' expired June 24, 2022 (in OQ Keeper database).

Staff confirmed with the Operator that the qualifications for these three tasks should have been kept up to date by personnel as they do get utilized. Since Everett Rhodes is not qualified in making plastic joining using these procedures, he is then not qualified to inspect joints being made within the system since his qualifications lapsed.

Staff has additional concerns about this requirement and will be following up with a data request to determine if any additional enforcement actions should be initiated.

PROBABLE VIOLATION: The City of Waynesboro Natural Gas System failed to ensure that their personnel are qualified to carry out the inspection of joints in plastic pipe.

4. Commission Rule 515-9-5-.01 - Emergency Procedures
Each and every entity under the jurisdiction of the Commission shall establish procedures that its employees and agents shall follow in the event that a utility facility is damaged when blasting or excavating activities are performed. At a minimum, these procedures shall prescribe the following:
(d) The need for safety equipment to effect the purposes of this rule that must be present at every excavation or blasting site, which equipment, at a minimum, shall include, reflective vests and hard hats to be worn by persons working in the excavation or blasting site; at least one working portable communication device, such as cellular telephone or a two-way radio, which may be utilized to contact emergency services on 911, the Utilities Protection Center and affected utility(ies); fluorescent cones for blocking off pedestrian and vehicle traffic; and flags, signs or other devices to notify the general public to avoid the area in which excavation or blasting activities are taking place.

STAFFS COMMENTS: During this inspection, Staff reviewed records related to an excavation damage that took place April 2, 2025, at 2935 GA Highway 56.

The 'After Action Review Guidance' form that was completed by the Operator indicated that they did not have Nomex coveralls. The City of Waynesboro Natural Gas System personnel had to borrow coveralls from a neighboring gas system to make necessary repairs to the damaged steel service. In addition to not having the flame retardant clothing, Waynesboro did not have warning signs to display in order to prevent the public from accessing the damage area.

PROBABLE VIOLATION: The City of Waynesboro Natural Gas System failed to provide adequate safety equipment for their personnel performing repairs to their damaged facilities while working in an excavation.

ITEMS OF CONCERN

1. 49CFR §192.471 - External corrosion control: Test leads.
   (a) Each test lead wire must be connected to the pipeline so as to remain mechanically secure and electrically conductive.

   Inspection form question #16. Test Leads states:
   Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?

   STAFFS CONCERN: While reviewing the 2024 and 2025 CP surveys, Staff found the Liberty Street @ Barron Street casing was missing its test point.

   Staff is concerned that the the City of Waynesboro Natural Gas System failed to ensure each test lead wire was connected to the pipeline so as to remain mechanically secure and electrically conductive.

2. 49CFR, §192.475 Internal corrosion control: General.
   (b) Whenever any pipe is removed from a pipeline for any reason, the internal surface must be inspected for evidence of corrosion.

   Inspection Form Question #19. Internal Corrosion in Cutout Pipe states:
   Do records document examination of removed pipe for evidence of internal corrosion?

   STAFFS CONCERN: Waynesboro's Operation & Maintenance manual section 9-L 'Internal Corrosion Control – General' (b) states that whenever any pipe is removed from a pipeline for any reason, the internal surface will be inspected for evidence of corrosion.

   While reviewing work orders from 2020 to 2025, Staff came across two locations where Waynesboro Natural Gas System killed services by cutting the section out and capping it. While the Operator informed Staff that they have never found indications of internal corrosion in their distribution system, the work orders for 834 Waters Street and 872 Jones Avenue failed to document that they checked for internal corrosion.

   Staff is concerned that the City of Waynesboro Natural Gas System failed to document the examination of pipe removed from the system for evidence of internal corrosion.

3. 49CFR §192.365 Service lines: Location of valves.
(b) Outside valves. Each service line must have a shut-off valve in a readily accessible location that, if feasible, is outside of the building.

STAFFS CONCERN: During this inspection, on October 7, 2025, Staff found the inlet valve on the riser at 625 N Liberty Street was not readily accessible to Waynesboro Gas personnel because a garage style storage shed had been placed over the pipe, separating the valve from the regulator. The day this facility was found, the property owner was not available to grant the Operator access to the locked storage shed. The Operator followed up the next day and gained access to the shed.

Staff advised the Operator that this riser needs to be relocated outside so that the valve is readily accessible to gas personnel.

4. 49CFR, §192.479 Atmospheric corrosion control: General.
(a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.

Inspection Form Question #27. Atmospheric Corrosion Monitoring states:
Do field observations indicate that pipe exposed to atmospheric corrosion is properly coated?

STAFFS CONCERN: During this inspection Staff visited Waynesboro's Town Border Station and Highway 56 Tap Station. Staff observed both regulator stations in need of cleaning and coating to protect the piping from atmospheric corrosion.

Staff is concerned that the City of Waynesboro Natural Gas System failed to clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere.

5. 49CFR, §192.751 Prevention of accidental ignition.
Each operator shall take steps to minimize the danger of accidental ignition of gas in any structure or area where the presence of gas constitutes a hazard of fire or explosion, including the following:
(c) Post warning signs, where appropriate.

Inspection Form Question #42. Prevention of Accidental Ignition states:
Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.

STAFFS CONCERN: Waynesboro's Operations & Maintenance manual section 13-Z 'Prevention of Accidental Ignition' (a) states:

> City of Waynesboro will take steps to minimize the danger of accidental ignition of gas in any structure or area where the presence of gas constitutes a hazard of fire or explosion, including:
> (3) Post warning signs, where appropriate, such as at above-ground facilities, vents, leak repair operations, etc.

During this inspection, Staff asked Operator personnel if they had warning signs available to them when responding to investigations or leaks for repair operations. The Operator informed Staff that they did not have any warning signs.

Staff is concerned that the City of Waynesboro Natural Gas System failed to be maintain the warning signs required for their personnel to comply with the requirements of §192.751(c).

6. Under the Pipeline and Hazardous Materials Safety Administrations (PHMSA) Guidelines for States Participating in the Pipeline Safety Program, Staff are tasked with reviewing and evaluating operators procedures and actions to address recommendations from the National Transportation Safety Board (NTSB) and PHMSA advisory bulletins. During this inspection Staff found that the City of Waynesboro Natural Gas System had neither a procedure in place, nor any records to demonstrate that that they had reviewed any of these items.

   STAFFS CONCERN: Staff are concerned that in the event of an accident or incident the Operator will not be able to demonstrate that they performed a review of the relevant NTSB and/or PHMSA notices, or what actions they decided to take, or not to take, in regard to the notices. Staff recommends that the Operator develop a procedure to review these bulletins and then document what actions they took in regard to the notices.

OPERATOR QUALIFICATION (OQ) PROTOCOL 9 FIELD EVALUATIONS

While on site, Staff performed Operator Qualification Protocol 9 field validation inspections on gas department personnel to ensure that covered tasks are being performed in accordance with appropriate operator-approved procedures. The Operator provided qualification records for a gas employee, Melvyn Verdree; for Pipeline Safety Staff to examine prior to observing performance of the tasks. Staff verified that his qualification records were current.

Melvyn Verdree performed the following covered task:
- Task #0301-B 'Manually Open and Close Valves (Meter Turn On or Off)' - Qualification good through 10/17/2027
- Task #0681 'Joining of Plastic Pipe: Stab Fittings' - Qualification good through 12/01/2026.
- Task #1011 'Apply or Repair Wrapped Coatings' - Qualification good through 5/05/2028.

Staff verified Melvyn Verdree was able to perform the covered tasks according to the procedures and was able to identify abnormal operating conditions (AOCs).

PROPOSED CIVIL PENALTY

Under Commission Rule 515-9-1.01, by virtue of the authority vested in the Commission by law and pursuant to orders issued by the Commission on May 4, 1967, July 6, 1967, April 23, 1968, and October 29, 1970, all Rules and Regulations prescribed by the United States Department of Transportation applicable to the "Transportation of Natural and Other Gas by Pipeline: Minimum Safety Standards" (C.F.R. 49, Parts 191 and 192) are by this Rule made the Rules and Regulations of the Georgia Public Service Commission for the safe installation and operation of all natural gas transmission and distribution facilities by companies subject to the jurisdiction of the Commission within this State.

Under Commission Rule 515-9-3-.08 (Written Formal Notice of Violation), the Commission may propose a civil penalty in conjunction with this notice of probable violation. Further, the City of Waynesboro Natural Gas System is subject to civil penalties under O.C.G.A. § 46-2-91(b) which states that: Any operator which violates any rule or regulation of the commission prescribed pursuant to subsection (i) of Code Section 46-2-20, or which fails, neglects, or refuses to comply with any order after notice thereof, shall be liable to a penalty not to exceed the maximum penalties provided for in 49 C.F.R. Section 190.223.

Staff have reviewed the circumstances surrounding the probable violations cited in this report and have recommended the civil penalties listed below. Please note that this recommended amount is less than the amount authorized by Georgia law.

Item #	Code / Rule	Description	Proposed Penalty
2	§192.465(a)	CP Monitoring	$5,000.00
4	§192.615(b)(2)	Emergency Plans – training	$5,000.00
5	§192.625(f)	Odorization – periodic sampling	$5,000.00
7	§192.465(b)(1)	Rectifier Monitoring	$5,000.00
TOTAL PROPOSED PENALTY			$20,000.00

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	$_____ 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 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