

City of Tompkinsville

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August 22, 2012

L. Allyson Honaker
Kentucky Public Service Commission
211 Sower Blvd. P.O. Box 615
Frankfort, Kentucky 40602

RECEIVED

AUG 27 2012

PUBLIC SERVICE
COMMISSION

Dear Ms. Honaker:

This letter is in response to the Order No. 2012-00362. Tompkinsville Natural Gas System has contracted with Shawn Martin with Martin Contracting as a gas consultant to bring Tompkinsville Natural Gas Systems back into compliance. The following is a list of our responses to the gas violation findings that Joel Grugin reported on March 2, 2012. These responses were filed on July 19, 2012 with the Public Service Commission. As you will see a great deal of the violations have to deal with lost records. Our original records were kept in the Police Department in the Courthouse. When the Police Department moved to the new location these records were lost. Prior management and administrations failed to keep current with new standards and staying in compliance with the Public Service Commission. Present management and administration is taking corrective measures to obtain compliance once again. We are requesting an informal meeting to discuss the corrective measures that are being taken to bring Tompkinsville Natural Gas System back into compliance.

Responses to the sections alleged to be violated are as follows:

1. 49 CFR Part 192.605 regarding the updated working copy of an operation and maintenance plan. Prior management neglected to update plan. Supervisor Harold Frazier will ensure plan is updated and reviewed periodically. Supervisor Frazier has also met with the employees to stress how important staying up to date and current with

all certifications required. Tompkinsville contracted with Danny Spencer/SME, Gas Consultant to provide the needed procedural manuals. Per an email from Joel Grugin to City Clerk Jennifer Arms, the PSC now has a copy of the procedural manuals that Mr. Spencer provided for the City of Tompkinsville.

2. 49 CFR Part 192.616 regarding public awareness. Records were lost during the transfer from the courthouse to the designated storage located in the police station. Designated storage located in the police station has been communicated to designated employees and will be supervised by Harold Frazier. Designated employees trained in the new standards and implemented/supervised by Harold Frazier.
3. 49 CFR Part 192.465 regarding the external corrosion control monitoring. Records documenting monitoring were lost during the transfer from the courthouse to the designated storage located in the police station, by previous management. Designated storage located in the police station has been communicated to designated employees and will be supervised by Harold Frazier. Designated employees trained in the new standards and implemented/supervised by Harold Frazier.
4. 49 CFR Part 192.721 regarding distribution systems patrolling. Records documenting patrolling were lost during the transfer from the courthouse to the designated storage located in the police station, by previous management. Designated storage located in the police station has been communicated to designated employees and will be supervised by Harold Frazier. Designated employees trained in the new standards and implemented/supervised by Harold Frazier.
5. 49 CFR Part 192.723 regarding distribution systems leakage surveys. Records documenting leak surveys were lost during the transfer from the courthouse to the designated storage located in the police station, by previous management. Designated storage located in the police station has been communicated to designated employees and will be supervised by Harold Frazier. Designated employees trained in the new standards and implemented/supervised by Harold Frazier.
6. 49 CFR Part 192.747 regarding valve maintenance of distribution systems. Records documenting valve maintenance were lost during the transfer from the courthouse to the designated storage located in

the police station, by previous management. Designated storage located in the police station has been communicated to designated employees and will be supervised by Harold Frazier. Designated employees trained in the new standards and implemented/supervised by Harold Frazier

7. 49 CFR 192.741 regarding pressure limiting and regulating stations. Deficiencies occurred due to prior management's failure to implement /supervise maintenance program. Tompkinsville Natural Gas System has contracted with Martin Contracting, Inc. to assist utility with facility maintenance and replacement of gas system components. Supervisor Frazier and city employees will work in conjunction with Martin Contracting to evaluate /repair needed system components.
8. 49 CFR Part 192.1005 regarding the DIMP Plan Deficiencies occurred due to prior management's failure to implement /supervise DIMP plan. Tompkinsville Natural Gas System has contracted with Martin Contracting, Inc. and other resources to develop/implement DIMP plan. Supervisor Frazier will supervise the development and implementation of DIMP plan.
9. 49 CFR Part 191.11 regarding annual report. Prior management neglected to file DOT Form PHMSA 7100-1. Supervisor Harold Frazier will ensure that PHMSA F 7100-1 will be filed according to standard. Supervisor Frazier has been designated as the responsible person for maintaining records and filing appropriately.
10. 49 CFR Part 192-383 regarding excess flow valve installation. Prior management neglected to train/supervise on the installation of excess flow valves. Tompkinsville Natural Gas System has contracted with Martin Contracting, Inc. to work on Natural Gas System. Tompkinsville Natural Gas System employees will be retrained and certified in gas service implementation standards. Supervisor Harold Frazier and management will supervise installation standards for anyone completing service installation on the gas system.
11. 49 CFR Part 192.805 regarding qualification programs. Prior management neglected to develop, implement, and maintain operator qualification plan. Tompkinsville Natural Gas System will utilize Chris Sly with Bluegrass Instructional Services, LLC to develop and implement operator qualification plan. Supervisor Harold Frazier and

management will supervise the development of operator qualification plan and will ensure its implementation.

12.49 CFR Part 192.805 (h) regarding qualification programs. Prior management neglected to track and schedule operator qualification training. Harold Frazier and Tompkinsville Natural Gas System management will ensure that employees are trained in all tasks needed. Tompkinsville Natural Gas System will contract Martin Contracting Inc. in tasks that are currently expired. Employees will be trained in needed tasks or those tasks will be contracted by Martin Contracting, Inc.

13.49 CFR Part 192.625 (f) regarding odorization of gas. Prior management neglected to track and schedule calibration on the odorator. Harold Frazier and Tompkinsville Natural Gas System management will track and schedule needed calibrations.

14.49 CFR Part 192.625(a) regarding odorization of gas qualification programs. Prior management neglected to schedule and maintain operator qualification training. All operator qualifications will be documented and tracked per supervision of Harold Frazier. Tompkinsville Natural Gas System has contacted Chris Sligh with Bluegrass Instructional Services to conduct operator qualification training.



Jeff Proffitt, Mayor
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