

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

CLOSURE OF PIPELINE SAFETY)	CASE NO.
INVESTIGATION – EASTERN KENTUCKY)	2020-00077
UNIVERSITY)	

ORDER

The Commission, on its own motion, initiates this proceeding to close the investigation of the master meter system operated by Eastern Kentucky University (EKU) on its campus in Richmond, Kentucky, for alleged violations of minimum federal pipeline safety standards. Staff from the Commission’s Division of Inspections (Staff) conducted a periodic inspection of EKU’s master meter system on October 22, 2018, and cited the university for two violations of federal pipeline safety standards. Staff performed a follow-up inspection on June 4, 2019, and cited EKU for five additional safety violations. Staff prepared reports of each inspection (Inspection Reports) setting forth its findings of violations.

Based upon the findings of violations, Staff issued EKU a Demand for Remedial Measures and Penalty Assessment, a copy of which is attached to this Order as an Appendix, to resolve all compliance and enforcement matters pertaining to the alleged pipeline safety violations. Staff noted in the letter that EKU had taken appropriate remedial measures to bring its system into compliance with federal safety standards. EKU subsequently paid the proposed penalty.

The Commission finds that EKU has addressed to its satisfaction the probable violations cited by Staff in the Inspection Reports. The Commission further finds that the Commission's investigation of the incident should be closed.

IT IS THEREFORE ORDERED that:

1. EKU's payment of Staff's proposed penalty and completion of remedial measures is accepted and resolves any and all alleged violations of KRS 278.495, KAR Title 807, or 49 CFR Parts 191, 192 or 199 as well as all claims for any penalty that could be assessed under KRS 278.992(1), arising out of the pipeline safety violations cited in the Inspection Reports.

2. EKU's payment of Staff's proposed penalty is not an admission by EKU that it willfully violated any provision of KRS 278.495, KAR Title 807, or 49 CFR Parts 191, 192 or 199.

3. The Commission's investigation of EKU's master meter system is closed.

4. This case is closed and removed from the Commission's docket.

By the Commission

ENTERED
MAR 16 2020 rcs
KENTUCKY PUBLIC
SERVICE COMMISSION

ATTEST:



Executive Director

Case No. 2020-00077

APPENDIX

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE
COMMISSION IN CASE NO. 2020-00077 DATED MAR 16 2020

FORTY-NINE PAGES TO FOLLOW



Matthew G. Bevin
Governor

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Secretary
Energy and Environment Cabinet

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Michael J. Schmitt
Chairman

Robert Cicero
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Talina R. Mathews
Commissioner

January 15, 2020

Brian Wilcox
Associate Vice President
Eastern Kentucky University
Richmond, KY 40475

Re: Periodic and Follow-up Inspections
Eastern Kentucky University Master Meter System

DEMAND FOR REMEDIAL MEASURES AND PENALTY ASSESSMENT

Dear Mr. Wilcox:

On October 22, 2018, Commission Staff (Staff) performed a periodic inspection of the master meter system of Eastern Kentucky University (EKU) in Richmond, Kentucky. Based on its review of EKU's operations and management practices, Staff prepared the attached Inspection Report dated November 13, 2018 (Periodic Report). Staff also has received and considered EKU's response to the Periodic Report dated December 20, 2018.

As outlined in the Periodic Report, Staff identified the following violations of federal pipeline safety standards during its inspection of the city's gas distribution system:

1. **49 CFR § 192.455(a)** – External Corrosion Control: Buried or submerged pipelines installed after July 31, 1971.

(a) Except as provided in paragraphs (b), (c), (f) and (g) of this section, each buried or submerged pipeline installed after July 31, 1971, must be protected against external corrosion, including the following: . . . (2) It must have a cathodic protection system designed to protect the pipeline in accordance with this subpart, installed and placed in operation within 1 year after completion of construction.

Finding: At the time of the periodic inspection, EKU could not provide records to establish that its pipelines have a cathodic protection system.

2. **49 CFR § 192.465** – External corrosion control: Monitoring.

(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.

Finding: EKU did not perform pipe-to-soil readings as required per CFR part 192.465(a).

Because of the regulatory violations cited in the Periodic Inspection Report, Staff performed a follow-up inspection of EKU's master meter system on June 4, 2019. Based on its follow-up inspection, Staff prepared the attached Inspection Report dated June 24, 2019 (Follow-up Report). Staff also has received and considered EKU's response to the Follow-up Report emailed to Staff on July 31, 2019.

As outlined in the Follow-up Report, Staff identified the following additional violations of federal pipeline safety standards during its inspection of the university's gas distribution system:

3. **49 CFR § 192.453** – General.

The corrosion control procedures required by §192.605(b)(2), including those for the design, installation, operation, and maintenance of cathodic protection systems, must be carried out by, or under the direction of, a person qualified in pipeline corrosion control methods.

Finding: EKU's cathodic protection program is not carried out by, or under the supervision of, a person qualified by experience and training in pipeline corrosion control methods.

4. **49 CFR § 192.465** – External corrosion control: Monitoring.

Each operator shall take prompt remedial action to correct any deficiencies indicated by the monitoring.

Finding: Pipe-to-soil readings taken in November 2018 following the initial inspection indicated there were approximately ten sections of pipe with low cathodic protection readings. Some of these segments of pipe had low cathodic protection readings going back to 2015. EKU failed to take prompt remedial action to correct these deficiencies.

5. **49 CFR § 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. Operators of master meter systems may comply with this requirement by: (1) Receiving written verification from their gas source that the gas has the proper concentration of odorant; and (2) Conducting periodic "sniff" tests at the extremities of the system to confirm that the gas contains odorant.

Finding: EKU failed to conduct sniff tests to confirm that the gas contains odorant.

6. **49 CFR § 192.616** – Public Awareness.

(j) Unless the operator transports gas as a primary activity, the operator of a master meter or petroleum gas system is not required to develop a public awareness program as prescribed in paragraphs (a) through (g) of this section. Instead the operator must develop and implement a written procedure to provide its customers public awareness messages twice annually.

Finding: At the time of the follow-up inspection, EKU could not provide records to ensure that the public awareness message was being provided to its customers twice annually

7. **49 CFR § 192.615** – Emergency plans.

(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following: . . . (4) The availability of personnel, equipment, tools, and materials, as needed at the scene of an emergency. . . .

Finding: EKU's Emergency Plan does not provide for the availability of personnel, equipment, tools, and materials needed at the scene of the emergency.

REMEDIAL MEASURES

Staff has determined that EKU has remediated the violations identified in the Periodic and Follow-up Reports.

CIVIL PENALTY

KRS 278.992(1) provides that any person who violates any minimum pipeline safety standard adopted by the United States Department of Transportation or any regulation adopted by the Commission governing the safety of pipeline facilities shall be subject to a civil penalty not to exceed the maximum civil penalty contained in 49

CFR § 190.223, as amended. As of the date of the periodic inspection, the maximum civil penalty under 49 CFR § 190.223 was \$209,002 per violation per day, not to exceed \$2,090,022 for any related series of violations. As of the date of the follow-up inspection, the maximum civil penalty under 49 CFR § 190.223 was \$213,268 per violation per day, not to exceed \$2,132,679 for any related series of violations. The penalty caps in effect as of the date of each inspection apply to the violations identified during that inspection.

In determining the amount of the proposed penalty, Staff considers the assessment factors set forth in KRS 278.992(1): "the size of the business of the person charged, the gravity of the violation, and the good faith of the person charged in attempting to achieve compliance, after notification of the violation." Additionally, Staff considers the assessment factors applied under federal law by the Associate Administrator for Pipeline Safety for PHMSA to determine the amount of the civil penalty for violation of a federal pipeline safety standard.¹

Based on its investigation of this matter and consideration of the penalty assessment factors discussed above, Staff concludes that EKU should be assessed a civil penalty in the amount of \$9,500. Staff considers EKU's failure to perform pipe-to-soil readings to confirm cathodic protection, failure to carry out its cathodic protection program with a qualified operator, and failure to take prompt remedial action to correct cathodic protection deficiencies indicated by monitoring to be serious violations that pose an unacceptable risk to public safety. EKU's record-keeping violations, though less serious, prevent the Commission from determining whether the university is conducting its master meter operations in compliance with minimum federal pipeline safety standards. In calculating the penalty to be assessed, Staff also considered the fact that EKU operates a small system and that it has taken adequate steps to bring its system into compliance with regulatory requirements.

If EKU does not wish to contest the proposed civil penalty, it should mail or deliver a cashier's check or money order made payable to the "**Kentucky State Treasurer**" in the amount of \$9,500 within 30 days of the date of this letter, to:

Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

¹ Federal law provides that PHMSA shall consider: (1) the nature, circumstances and gravity of the violation, including adverse impact on the environment; (2) the degree of the respondent's culpability; (3) the respondent's history of prior offenses; (4) any good faith by the respondent in attempting to achieve compliance; and (5) the effect on the respondent's ability to continue in business. The Associate Administrator also may consider: (1) the economic benefit gained from the violation, if readily ascertainable, without any reduction because of subsequent damages; and (2) such other matters as justice may require. See 49 CFR § 190.225.

Payment of the proposed civil penalty and completion of all remedial measures will satisfy and resolve any and all claims against ECU for violation(s) of KRS 278.495, KAR Title 807, or 49 CFR Parts 191, 192 or 199, as well as for any penalty that could be assessed under KRS 278.992(1), arising out of the pipeline safety violations cited herein. ECU's payment of the proposed civil penalty will not be considered an admission by ECU that it willfully violated any provision of KRS 278.495, KAR Title 807, or 49 CFR Parts 191, 192 or 199. Upon payment of the proposed penalty, the Commission will confirm the resolution of this matter by entry of an order. Payment of the penalty constitutes a waiver by ECU of any right to a hearing in any proceeding initiated to close the investigation.

If ECU does not pay the proposed civil penalty within 30 days of the date of this letter, the Commission will institute an administrative proceeding against ECU and hold a formal hearing during which ECU will have an opportunity to present evidence and show cause why it should not be subject to penalties under KRS 278.992(1) for the pipeline safety violations cited herein.

This demand letter addresses only those matters specifically referred to in this document. This demand letter does not waive or otherwise affect any obligations or liabilities that may result from other activities by ECU. If you have any questions, please contact John Park at 502-782-2589.

Sincerely,



Gwen R. Pinson
Executive Director

Attachment

INSPECTION INFORMATION

KY PSC Inspector(s):	Scott Morris, David Nash		Report Number:	102218
Inspection Date(s):	10/22/2018		Report Date:	11/13/2018
Inspection Type:	Periodic Regulatory Compliance Inspection			

OPERATOR INFORMATION

Name of Operator:	Eastern Kentucky University		OP ID No.:	
Type of Facility:	Master Meter Operator		Location of Facility:	Madison County
Area of Operation:	Richmond	Campus of EKU		
<u>Official Operator Contact and Address:</u> (Contact for Inspection Letter) Tim Wiseman - Utility Compliance Coordinator Brian Wilcox - Associate VP Facilities Services & Capital Planning Gentry Building 521 Lancaster Avenue Richmond, KY 40475			<u>Unit Name and Address</u> 63 buildings, offices and houses on and around the campus of EKU.	
Phone # and Email:	Emergency contact: Tim Wiseman 859-248-4385 Timothy.wiseman@eku.edu			
Records Location:	EKU and RussMar			
<u>Persons Interviewed</u>	<u>Title</u>	<u>Phone No.</u>	<u>Email</u>	
Tim Wiseman	Utility Compliance Coordinator	859-248-4385	Timothy.wiseman@eku.edu	
Earl Taylor	RussMar Utilities, Systems Compliance Officer	606-235-0790	Earl.taylor@russmarutilities.com	
Ronnie Mink	Associate Director Facilities Services	859-622-2966	Ron.mink@eku.edu	
Brian Wilcox	Associate V.P. Facilities Services & Capital Planning	859-622-1497	Brian.wilcox@eku.edu	
Has the Operator provided an updated Emergency Contact List?				
			Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Number of Customers:	Approximately 4,600 students			
Workforce Summary:	There are approximately 23 OQ trained employees between RussMar and EKU that operate this system. RussMar handles the			

		day to day operations, and 4 EKU employees are trained on M5, M7, M11 and M13 tasks to respond in case of emergencies.		
Number of Separate Gas Supplied Buildings:		63 buildings have gas powered boilers, 8 buildings have emergency gas powered generators. The Powell building and Case dining have a couple of diners that use gas for cooking for the cafeterias. There are two rental houses and one office that have gas hot water heaters.		
Number of Gas Supplied Units:		63		
Number of Gas Maintenance Employees:		15 RussMar and Martin Contracting employees, and 4 OQ trained EKU employees for all emergency responses. Emergency calls go to the EKU police department, then to EKU employees who respond to emergency calls, and contact RussMar as needed.		
Name(s) of Contractor(s):		RussMar Utility Management Company		
Gas Supplier(s):		Richmond Utilities		
Operating Pressure(s):		32 psig		
Date System Installed:		Approximately 1960 to present		
Size of Mains:	6 inch down to 2 inch		Type of Pipe:	Coated steel and plastic
Size of Services:	2 inch and under		Type of Pipe:	Coated steel and plastic
		Additional Operator Information:		
		RussMar Utility Management Company is operating this master meter system.		

Date of Last Inspection:	8/17/2017			
Number of Deficiencies:	0		Deficiencies not Cleared:	0

Summary of Areas Inspected

<u>PHMSA Question Set</u>					
<input checked="" type="checkbox"/> Emergency Plan	<input checked="" type="checkbox"/> Operations and Maintenance Plan	<input checked="" type="checkbox"/> Critical Valves Maintenance Inspections			
<input checked="" type="checkbox"/> Cathodic Protection	<input checked="" type="checkbox"/> Accidents	<input checked="" type="checkbox"/> Leak Surveys			
<input checked="" type="checkbox"/> Odorization	<input checked="" type="checkbox"/> Operator Qualification	<input checked="" type="checkbox"/> Damage Prevention			
<input checked="" type="checkbox"/> Pipeline Markers	<input checked="" type="checkbox"/> Regulator Stations	<input checked="" type="checkbox"/> DIMP			
<input checked="" type="checkbox"/> Field Inspection	<input type="checkbox"/> Other				

Summary:

The Operation and Maintenance, Emergency, Operator Qualification, Distribution Integrity Management, and Public Awareness Plan requirements were discussed and reviewed during the office visit. Also inspected were records pertaining to sniff tests, valve inspections and leakage surveys. Corrosion records were not available to review.

Findings

1. At the time of the inspection the operator could not provide records to ensure that the pipeline was cathodically protected per CFR 192.455.
2. The operator did not perform pipe to soil readings as required per CFR part 192.465(a).

Recommendations

It is recommended that the Emergency Plan be up-dated. At the time of the inspection, RussMar employee Earl Taylor sent me a copy of the Emergency Plan by e-mail.

Submitted by:



11/13/2018

Utility Regulatory & Safety Investigator

OPERATION, MAINTENANCE, AND EMERGENCY PLANS

1. O&M Plans *Does operator have a written Operation and Maintenance Plan (O&M Plan)?*

49 CFR 192.605(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. O&M Plans *Does operator review and update the O&M Plan annually?*

49 CFR 192.605(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes Reviewed 12-26-17 by Zane Salyers. Scheduled to be reviewed in December 2018.

3. O&M Plans *Does operator's O&M Plan require the reporting of incidents by telephone to OPS and the KY PSC?*

49 CFR 191.5

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Emergency Plans *Does operator have a written Emergency Plan?*

49 CFR 192.615(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes: At the time of the inspection, RussMar employee Earl Taylor sent me a copy of the Emergency Plan by e-mail. The Emergency Plan needs up-dating, there are personnel listed in it that are no longer with EKV, and some new persons that are now at EKV that are not included, and one person listed in it has a title change.

5. Emergency Plans *Does the Emergency Plan provide for: receiving, identifying, and classifying notices of events requiring immediate response by the operator?*

49 CFR 192.615(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Emergency Plans *Does the Emergency Plan provide for: Establishing and maintaining communication with fire, police, and other public officials?*

49 CFR 192.615(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Question Set
STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

7. Emergency Plans Does the Emergency Plan provide for: Prompt and effective response to a notice of each type of emergency, including gas detected inside or near a building, fire located new or directly involving a pipeline facility, explosion involving a pipeline facility, and a natural disaster?

49 CFR 192.615(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

8. Emergency Plans Does the Emergency Plan provide for: the availability of personnel, equipment, tools, and materials needed at the scene of the emergency?

49 CFR 192.615(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Emergency Plans Does the Emergency Plan provide for: actions directed toward protecting people first and then property?

49 CFR 192.615(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

10. Emergency Plans Does the Emergency Plan provide for: emergency shutdown and pressure reduction in any section of the operator's pipeline system necessary to minimize hazards to life or property?

49 CFR 192.615(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

11. Emergency Plans Does the Emergency Plan provide for: making safe any actual or potential hazard to life or property?

49 CFR 192.615(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

12. Emergency Plans Does the Emergency Plan provide for: notifying appropriate fire, police, and other public officials of gas pipeline emergencies and coordinating with them during an emergency?

49 CFR 192.615(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Question Set
STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

13. Emergency Plans Does the Emergency Plan provide for: safely restoring any service outages?

49 CFR 192.615(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

14. Emergency Plans Does the Emergency Plan provide for: starting an accident investigation under 192.617 as soon as practicable?

49 CFR 192.615(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

15. Emergency Plans Does the Operator: furnish a copy of the emergency plan to the person responsible for emergency action?

49 CFR 192.615(b)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

16. Emergency Plans Does the Operator: train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures?

49 CFR 192.615(b)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

17. Emergency Plans Does the Operator: review employee activities after an emergency to determine if procedures were followed?

49 CFR 192.615(b)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

CRITICAL VALVES AND CATHODIC PROTECTION

1. Critical Valves Does operator check and maintain each valve (critical or key valve) necessary for the safe operation of the system at intervals not exceeding 15 months, but at least once each calendar year?

49 CFR 192.747

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Date of Last Check: 6-27-18

Maintenance performed by: Marvin Anderson

Notes

EKU has 5 critical valves, there are approximately 50 non-critical valves. There were 9 new valves installed recently on Park Drive near the Whitlock building and Powell buildings.

PHMSA Question Set
STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

2. Critical Valves *Are the critical valve records adequate?*

49 CFR 192.747

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Cathodic Protection *Is the cathodic protection program carried out by, or under the direction of, a person qualified by experience and training in pipeline corrosion control methods?*

49 CFR 192.453

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

EKU has contracted with RussMar to conduct pipe to soil readings. At the time of the inspection RussMar had not provided cathodic protection inspections as required.

4. Cathodic Protection *Pipelines installed after July 31, 1971, are cathodically protected and have an external coating?*

49 CFR 192.455(a)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

The rectifier was taken out in 2017, and anodes were supposed to be installed according to the 2017 inspection report. 2018 pipe to soil readings were not available to review. According to the 2017 inspection, pipe to soil readings last taken by Marvin Anderson in July 2017.

5. Cathodic Protection *Pipelines installed before August 1, 1971 that is bare or coated are cathodically protected in areas of active corrosion?*

49 CFR 192.457(b)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

6. Cathodic Protection *Does the cathodic protection system provide a level of cathodic protection that complies with one of more of the applicable criteria contained in Appendix D of the Regulations?*

49 CFR 192.463(a)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Question Set
STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

7. Cathodic Protection Does operator test each pipeline that is under cathodic protection at intervals not exceeding 15 months, but at least once each calendar year?

49 CFR 192.465(a)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Date of Last Check:	7/10/2017	Survey performed by:	Marvin Anderson
Notes EKU has 18 points where they take readings. The rectifier was removed in 2017, and anodes were supposed to be installed to provide CP protection. No records on CP readings and anode installation locations were available to review. The 2018 pipe to soil readings were not conducted as required.			

8. Cathodic Protection Are the cathodic protection survey records adequate?

49 CFR 192.465(a)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes Follow up

9. Cathodic Protection Is each buried pipeline electrically isolated from other underground structures that may cause interference with the cathodic protection system?

49 CFR 192.467(a)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

10. Cathodic Protection Inspection and electrical tests are made to assure that electrical isolation is adequate?

49 CFR 192.467(d)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

11. Cathodic Protection Does operator have sufficient test stations or other contact points for electrical measurement purposes?

49 CFR 192.469

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

ACCIDENTS, LEAK SURVEYS, AND ODORIZATION

1. Accidents Are there established procedures for analyzing accidents and failures including samples of the failed facility or equipment for the purpose of determining the cause of the failure and minimizing the possibility of recurrence?

49 CFR 192.617

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes Robert Barrett – RussMar employee performed this 10-16-18, and 2-3 days prior or after this, found 5 grade 3 leaks and one valve that was repaired on 10/15/18. Previous leak survey performed July 2017.
--

PHMSA Question Set
STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

2. Leak Surveys Does operator test each disconnected service line in the same manner as a new service line, before being reinstated?

49 CFR 192.725

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Leak Surveys Does operator disconnect abandoned pipelines from all sources and supplies of gas, purge of gas and seal at the ends?

49 CFR 192.727

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Leak Surveys Does operator lock service lines that are inactive?

49 CFR 192.727

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Leak Surveys Does operator patrol mains where anticipated physical movement or external loading could cause failure or leakage?

49 CFR 192.721

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Date of Last Check:

Survey performed by:

Notes

EKU has no areas where patrolling is required.

6. Leak Surveys Are the main patrolling records adequate?

49 CFR 192.721

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

7. Leak Surveys Does operator perform leakage surveys with leak detector equipment with the required intervals?

49 CFR 192.723

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Date of Last Check:

10/15/18

Survey performed by:

Robert Barrett

Notes

PHMSA Question Set
STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

8. Leak Surveys *Are the leakage survey records adequate?*

49 CFR 192.723

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Odorization *Is the gas in the operator's pipeline odorized?*

49 CFR 192.625(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes Richmond Utilities provides gas to EKU.

10. Leak Surveys *Does operator have written verification from their gas supplier that the gas has the proper concentration of odorant?*

49 CFR 192.625(f)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Columbia Transmission odorizes the gas they provide to Richmond Utilities; Robert Barrett performs odorant testing monthly with an odorometer. Last performed 10-9-18.

11. Odorization *Does operator conduct periodic (recommend at least once per month) "sniff" tests at the extremities of the system to confirm that the gas contains odorant?*

49 CFR 192.625(f)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Date of Last Check: 10/9/18 **Test performed by:** Robert Barrett

Notes

Sniff tests are performed monthly when odorant testing is performed.

12. Odorization *Are the "sniff" test records adequate?*

49 CFR 192.625(f)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Robert Barrett performs odorant testing monthly with an odorometer. Last performed 10-9-18.

OPERATOR QUALIFICATION

1. Operator Qualification *Does operator have a written qualification program (OQ Program)?*

49 CFR 192.805

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes OQ records reviewed for everyone who has performed work at EKU since 2017 inspection. 7 EKU employees OQ records for EKU employees qualified to shut down services as needed. Earl sent me records on 4 EKU employees 9/15/16. Anglin, Frazier, Kirby, Wiseman.

PHMSA Question Set
STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

2. Operator Qualification Does the OQ Program include provisions to identify covered tasks?

49 CFR 192.805

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Operator Qualification Does the OQ Program include provisions to ensure through evaluation that individuals performing covered tasks are qualified?

49 CFR 192.805

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Operator Qualification Does the OQ Program include provisions to allow individuals that are not qualified pursuant to this subpart to perform a covered task if directed and observed by an individual that is qualified?

49 CFR 192.805

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Operator Qualification Does the OQ Program include provisions to evaluate an individual if the operator has reason to believe that the individual's performance of a covered task contributed to an incident as defined in Part 191?

49 CFR 192.805

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Operator Qualification Does the OQ Program include provisions to evaluate an individual if the operator has reason to believe that the individual is no longer qualified to perform a covered task?

49 CFR 192.805

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

7. Operator Qualification Does the OQ Program include provisions to communicate changes that affect covered tasks to individuals performing those covered tasks?

49 CFR 192.805

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Question Set
STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

8. Operator Qualification Does the OQ Program include provisions to identify those covered tasks and the intervals at which evaluation of the individual's qualifications is needed?

49 CFR 192.805

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Operator Qualification Does operator keep records that demonstrate compliance with OQ regulations?

49 CFR 192.807

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

10. Operator Qualification Does operator's qualification records include identification of qualified individuals?

49 CFR 192.807(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

11. Operator Qualification Does operator's qualification records include identification of the covered tasks the individual is qualified to perform?

49 CFR 192.807(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

12. Operator Qualification Does operator's qualification records include dates of current qualification?

49 CFR 192.807(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

13. Operator Qualification Does operator's qualification records include qualification methods?

49 CFR 192.807(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

14. Operator Qualification Does operator maintain an individual's current qualifications while the individual is performing the covered task?

49 CFR 192.807(b)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Question Set
STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

15. Operator Qualification *Does operator keep records of prior qualification and records of individuals no longer performing covered tasks for a period of five years?*

49 CFR 192.807(b)

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes Not available for review during the inspection.

16. Operator Qualification *Has operator completed the qualification of individuals performing covered tasks?*

49 CFR 192.809(b)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

DAMAGE PREVENTION, PUBLIC AWARENESS, LINE MARKERS, AND REGULATOR STATIONS

1. Damage Prevention *Is the operator a member of a qualified one-call system (Kentucky 811)?*

49 CFR 192.614

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Who located your buried pipelines in the area of excavation activity before the activity begins?

RussMar employees perform locates, 4 locates performed in 2018.

Is the locator OQ qualified? Yes

Notes

2. Public Awareness *Has the operator developed and implemented a written procedure to provide to its customer's public awareness messages twice annually?*

49 CFR 192.616(j)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes Sent out once a semester September 2018, due again Jan. 2019. Brian Wilcox sent me this.

2. Public Awareness *Does the public awareness message include a description of the purpose and reliability of the pipeline?*

49 CFR 192.616(j)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Public Awareness *Does the public awareness message include an overview of the hazards of the pipeline and prevention measures used?*

49 CFR 192.616(j)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Question Set
STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

4. Public Awareness Does the public awareness message include information about damage prevention?

49 CFR 192.616(j)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Public Awareness Does the public awareness message include how to recognize and respond to a leak?

49 CFR 192.616(j)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Public Awareness Does the public awareness message include how to recognize and respond to a leak?

49 CFR 192.616(j)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Public Awareness Does the public awareness message include how to get additional information?

49 CFR 192.616(j)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

7. Line Markers Are line markers placed and maintained along each section of aboveground main in an area accessible to the public?

49 CFR 192.707(c)

No

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

8. Regulator Stations Is the operator responsible for the regulator and setting at the source of supply?

49 CFR 192.739

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

9. Regulator Stations Are regulators being inspected and tested once each calendar year (not to exceed 15 months)?

49 CFR 192.739

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Question Set
STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

10. Regulator Stations *Do inspection and test records indicate that regulators are in good mechanical condition?*

49 CFR 192.739

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

11. Regulator Stations *Do inspection and test records indicate that regulators are adequate from the standpoint of capacity and reliability of operation for the service in which it is employed?*

49 CFR 192.739

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

12. Regulator Stations *Do inspection and test records indicate that regulators are set to function at the correct pressure?*

49 CFR 192.739

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

13. Regulator Stations *Do inspection and test records indicate that regulators are properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation?*

49 CFR 192.739

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

14. Regulator Stations *Are regulator inspections being performed by an individual that is OQ qualified?*

49 CFR 192.739

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

DISTRIBUTION INTEGRITY MANAGEMENT (DIMP)

1. DIMP *Has the operator developed and implemented an IM program?*

49 CFR 192.1015(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Question Set
STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

2. DIMP Does the IM program include a written plan?

49 CFR 192.1015(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Effective date of DIMP plan was 9/11/2014. Last reviewed on 3-5-18 by Zane Salyers.

3. DIMP Does the written plan address knowledge of pipeline system, including approximate location and material, and a plan for gaining knowledge through normal activities conducted on the pipeline (i.e. design, construction, O and M)?

49 CFR 192.1015(b)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. DIMP Does the written plan address identification of threats (existing or potential) including corrosion, natural forces, excavation damage, other outside force damage, material weld failure, equipment failure, and incorrect operation?

49 CFR 192.1015(b)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. DIMP Does the written plan rank risks (the operator must evaluate the risks to its pipeline and estimate the relative importance of each identified threat)?

49 CFR 192.1015(b)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes The number one threat listed is excavation damage.

6. DIMP Does the written plan identify and implement measures designed to reduce the risks from failure of its pipeline?

49 CFR 192.1015(b)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

7. DIMP Does the written plan measure performance, monitor results, and evaluate effectiveness, including the number of leaks eliminated or repaired on its pipeline and their causes?

49 CFR 192.1015(b)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes 2017 1 leak external corrosion, RussMarr scheduled to come to EKU in December 2018 review plans.

8. DIMP Does the written plan address the operation determination of the appropriate period for conducting IM program evaluations and re-evaluation of the entire program at least every five (5) years?

49 CFR 192.1015(b)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Question Set
STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

9. DIMP Has the operator maintained the following records for a period of at least 10 years: A written IM plan in accordance with this section, including superseded IM plans?

49 CFR 192.1015(c)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes Not Due until 2024

10. DIMP Has the operator maintained the following records for a period of at least 10 years: Documents supporting threat identification?

49 CFR 192.1015(c)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

11. DIMP Has the operator maintained the following records for a period of at least 10 years: Documents showing the location and material of all piping and appurtenances installed after the effective date of its IM program and, to the extent known, the location and material of all pipe and appurtenances that were existing on the effective date of its pro?

49 CFR 192.1015(c)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

FIELD INSPECTION

1. Field Inspection Is each meter and service regulator installed in a readily accessible location and protected from corrosion and other damage (including vehicular damage) that may be anticipated?

49 CFR 192.353(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. Field Inspection Is each service regulator, installed with a building, located as near as practical to the point of service line entrance?

49 CFR 192.353(b)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Field Inspection Is each meter, installed within a building, located in a ventilated place and not less than 3 feet from any source of ignition or any source of heat which might damage the meter?

49 CFR 192.353(c)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

No inside meters.

PHMSA Question Set
STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

4. Field Inspection *Do service regulator vents and relief vents terminate outdoors?*

49 CFR 192.355(b)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Field Inspection *Are service regulator vents and relief vents rain and insect resistant?*

49 CFR 192.355(b)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Field Inspection *Are service regulator vents and relief vents located at a place where gas from the vent can escape freely into the atmosphere and away from an opening into the building?*

49 CFR 192.355(b)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

7. Field Inspection *Are service regulator vents and relief vents protected from damage caused by submergence in areas where flooding may occur?*

49 CFR 192.355(b)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

8. Field Inspection *Are any meter sets found where customers are abusing meters?*

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

No

9. Field Inspection *Were any leaks found during the field inspection? Leak detector equipment used? Vegetation?*

49 CFR 192.723

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

There was no leak inspection performed during the field inspection.

10. Field Inspection *Were main line valves located and marked?*

49 CFR 192.707

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Question Set
STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

11. Field Inspection *Are line markers placed and maintained along each section of aboveground main in an area accessible to the public?*

49 CFR 192.707

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes
None

12. Field Inspection *Is information on line markers correct and legible?*

49 CFR 192.707

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

13. Field Inspection *Is a fire extinguisher provided when a hazardous amount of gas is being vented into open air?*

49 CFR 192.751(a)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

INSPECTION INFORMATION

KY PSC Inspector(s):	Scott Morris		Report Number:	062419
Inspection Date(s):	06/04/2019		Report Date:	06/24/2019
Inspection Type:	Follow-up Periodic Regulatory Compliance Inspection			

OPERATOR INFORMATION

Name of Operator:	Eastern Kentucky University		OP ID No.:	n/a
Type of Facility:	Master Meter Operator		Location of Facility:	Madison County
Area of Operation:	Richmond	Campus of EKU		
Official Operator Contact and Address: (Contact for Inspection Letter)		Unit Name and Address		
Tim Wiseman - Utility Compliance Coordinator Brian Wilcox - Associate VP Facilities Services & Capital Planning Gentry Building 521 Lancaster Avenue Richmond, KY 40475		63 buildings use gas boilers for heat, two houses use natural gas heat and hot water. Two dormitories (Martin Hall, North Hall) have gas logs in the lobbies. Powell and Stratton cafeterias use natural gas for cooking.		
Phone # and Email:	Emergency contact: Tim Wiseman 859-248-4385 Timothy.wiseman@eku.edu 2 nd contact Glen Adams 859-200-9096 Glen.adams@eky.edu			
Records Location:	EKU			
Persons Interviewed	Title	Phone No.	Email	
Tim Wiseman	Utility Compliance Coordinator	859-248-4385	Timothy.wiseman@eku.edu	
Has the Operator provided an updated Emergency Contact List?			Yes <input checked="" type="checkbox"/>	<input type="checkbox"/> No
Number of Customers:	Approximately 4,600 students			
Workforce Summary:	There are 3 EKU maintenance employees that are OQ trained on M5, M7, M11 and M13 tasks to respond in case of emergencies: Inspect, Service and Operate Line Valves, Prevent Accidental Ignition, Recognize and React to Generic Abnormal Operating Conditions, and Investigate Reported gas leaks and odors in buildings. Besides 4 OQ tasks, EKU does not currently have a contractor to help run the master meter system and emergency operations.			

Number of Separate Gas Supplied Buildings:		63 buildings have gas powered boilers, 8 buildings have emergency gas powered generators. The Powell building and Case dining have a couple of diners that use gas for cooking for the cafeterias. There are two rental houses and one office that have gas hot water heaters.		
Number of Gas Supplied Units:		63		
Number of Gas Maintenance Employees:		3 OQ trained EKU employees for all emergency responses. Emergency calls go to the EKU police department, then to EKU employees who respond to emergency calls.		
Name(s) of Contractor(s):		None currently		
Gas Supplier(s):		Richmond Utilities		
Operating Pressure(s):		32 psig		
Date System Installed:		Approximately 1960 to present		
Size of Mains:	6 inch down to 2 inch		Type of Pipe:	Coated steel and plastic
Size of Services:	2 inch and under		Type of Pipe:	Coated steel and plastic
Additional Operator Information:				
Date of Last Inspection:	10/22/2018			
Number of Deficiencies:	2		Deficiencies not Cleared:	1

Summary of Areas Inspected

<u>PHMSA Question Set</u>		
<input checked="" type="checkbox"/> Emergency Plan	<input checked="" type="checkbox"/> Operations and Maintenance Plan	<input checked="" type="checkbox"/> Critical Valves Maintenance Inspections
<input checked="" type="checkbox"/> Cathodic Protection	<input checked="" type="checkbox"/> Accidents	<input checked="" type="checkbox"/> Leak Surveys
<input checked="" type="checkbox"/> Odorization	<input checked="" type="checkbox"/> Operator Qualification	<input checked="" type="checkbox"/> Damage Prevention
<input checked="" type="checkbox"/> Pipeline Markers	<input checked="" type="checkbox"/> Regulator Stations	<input checked="" type="checkbox"/> DIMP
<input checked="" type="checkbox"/> Field Inspection	<input type="checkbox"/> Other	

Summary:

The Operation and Maintenance, Emergency, Operator Qualification, Distribution Integrity Management, and Public Awareness Plan requirements were discussed and reviewed during the office visit. Also inspected were records pertaining to sniff tests, valve inspections, cathodic protection records and leakage surveys. A protocol 9 inspection was performed with Utility Compliance Coordinator Tim Wiseman on emergency valve shut off procedures.

This was a follow-up inspection from the previous inspection conducted on October 22, 2018. There were 2 violations as a result of the 2018 inspection, one of the two were corrected:

1. At the time of the inspection the operator could not provide records to ensure that the pipeline was cathodically protected per CFR 192.455 – **not corrected**.
2. The operator did not perform pipe to soil readings as required per CFR part 192.465(a) – **corrected**.

The operator addressed the 49 CFR part 192.465(a) deficiency by having contract personnel from RussMar perform pipe to soil readings on 11-30-18.

The results of those tests indicated 10 locations with low cathodic protection readings. Some of those dating back to 2015 and possibly longer. At the time of this inspection, the cathodic protection on the piping with low cathodic protection readings had not been corrected as stated in EKU's response to the October 22, 2018, inspection.

Findings

The 2019 follow-up inspection resulted in 6 total deficiencies, one deficiency from the 2018 inspection, and five new deficiencies. The deficiencies were discussed during the exit interview.

1. The cathodic protection program is not carried out by, or under the direction of, a person qualified by experience and training in pipeline corrosion control methods per 49 CFR 192.453.
2. At the time of the inspection the operator could not provide records to ensure that the pipeline was cathodically protected per 49 CFR 192.455.
3. The operator did not take prompt remedial action to correct any deficiencies by the monitoring per 49 CFR 192.465(d).
4. The operator had not conducted sniff tests to confirm that the gas contains odorant as required per 49 CFR 192.625(f).
5. At the time of the inspection the operator could not provide records to ensure that the public awareness message was being provided to its customers twice annually per 49 CFR 192.616(j).
6. The Emergency Plan does not provide for the availability of personnel, equipment, tools, and materials needed at the scene of the emergency as required per 49 CFR 192.615(a).

Area of Concerns

The operator ended their contract with RussMar in March of 2019, and this left the operator without qualified persons to perform the required tasks associated with the operation and maintenance of the master meter system. Listed below are areas of concerns of required tasks that EKU no longer has qualified personnel to perform that was previously performed by RussMar.

1. The operator does not have a qualified person to perform locates as required per 49 CFR 192.614
2. The operator does not have a qualified person to perform leakage surveys as required per 49 CFR 192.723.
3. The written qualification program required per 49 CFR 192.805 was under the direction of contractor RussMar previously, including training and re-qualification of EKU maintenance persons for operator qualified tasks.

Recommendations

It is recommended that the Public Awareness message be provided to students, faculty, and staff, more than twice a year, not just for the fall and spring semesters, but any time school is in session, including intercession, summer school, and summer camps.

Submitted by:



Scott Morris
Utility Inspector

PHMSA Question Set

STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

OPERATION, MAINTENANCE, AND EMERGENCY PLANS

1. O&M Plans *Does operator have a written Operation and Maintenance Plan (O&M Plan)?*

49 CFR 192.605(a)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

The O&M Plan was up-dated in 2019.

2. O&M Plans *Does operator review and update the O&M Plan annually?*

49 CFR 192.605(a)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes.

3. O&M Plans *Does operator's O&M Plan require the reporting of incidents by telephone to OPS and the KY PSC?*

49 CFR 191.5

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes:

4. Emergency Plans *Does operator have a written Emergency Plan?*

49 CFR 192.615(a)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes:

5. Emergency Plans *Does the Emergency Plan provide for: receiving, identifying, and classifying notices of events requiring immediate response by the operator?*

49 CFR 192.615(a)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Emergency Plans *Does the Emergency Plan provide for: Establishing and maintaining communication with fire, police, and other public officials?*

49 CFR 192.615(a)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Question Set

STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

7. Emergency Plans Does the Emergency Plan provide for: Prompt and effective response to a notice of each type of emergency, including gas detected inside or near a building, fire located new or directly involving a pipeline facility, explosion involving a pipeline facility, and a natural disaster?

49 CFR 192.615(a)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

8. Emergency Plans Does the Emergency Plan provide for: the availability of personnel, equipment, tools, and materials needed at the scene of the emergency?

49 CFR 192.615(a)

Sat +	Sat	Concern	Unsat	NA	NC
			x		

Notes

The Emergency plan lists contract personnel RussMar Utility Management (EKU no does not currently have a contract with RussMar). Personnel to perform all of the operator qualified tasks are not identified in the Emergency Plan.

9. Emergency Plans Does the Emergency Plan provide for: actions directed toward protecting people first and then property?

49 CFR 192.615(a)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

10. Emergency Plans Does the Emergency Plan provide for: emergency shutdown and pressure reduction in any section of the operator's pipeline system necessary to minimize hazards to life or property?

49 CFR 192.615(a)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

11. Emergency Plans Does the Emergency Plan provide for: making safe any actual or potential hazard to life or property?

49 CFR 192.615(a)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

12. Emergency Plans Does the Emergency Plan provide for: notifying appropriate fire, police, and other public officials of gas pipeline emergencies and coordinating with them during an emergency?

49 CFR 192.615(a)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Question Set

STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

13. Emergency Plans Does the Emergency Plan provide for: safely restoring any service outages?

49 CFR 192.615(a)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

14. Emergency Plans Does the Emergency Plan provide for: starting an accident investigation under 192.617 as soon as practicable?

49 CFR 192.615(a)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

15. Emergency Plans Does the Operator: furnish a copy of the emergency plan to the person responsible for emergency action?

49 CFR 192.615(b)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

16. Emergency Plans Does the Operator: train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures?

49 CFR 192.615(b)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

17. Emergency Plans Does the Operator: review employee activities after an emergency to determine if procedures were followed?

49 CFR 192.615(b)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

CRITICAL VALVES AND CATHODIC PROTECTION

1. Critical Valves Does operator check and maintain each valve (critical or key valve) necessary for the safe operation of the system at intervals not exceeding 15 months, but at least once each calendar year?

49 CFR 192.747

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Date of Last Check: 6-27-18

Maintenance performed by: Marvin Anderson

Notes

EKU has identified 6 critical valves, and approximately 50 non-critical valves. There were 9 new valves installed on Park Drive near the Whitlock building and Powell buildings. Three EKU maintenance employees are operator qualified for Service and Operate Line Valves.

PHMSA Question Set

STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

2. Critical Valves *Are the critical valve records adequate?*

49 CFR 192.747

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Cathodic Protection *Is the cathodic protection program carried out by, or under the direction of, a person qualified by experience and training in pipeline corrosion control methods?*

49 CFR 192.453

Sat +	Sat	Concern	Unsat	NA	NC
			x		

Notes

EKU did contract with RussMar to conduct pipe to soil readings, last performed 11/3/18, found 10 locations with low readings. RussMar no longer is contracted by EKU.

4. Cathodic Protection *Pipelines installed after July 31, 1971, are cathodically protected and have an external coating?*

49 CFR 192.455(a)

Sat +	Sat	Concern	Unsat	NA	NC
			x		

Notes

The rectifier was taken out in 2017, and anodes were supposed to be installed according to the 2017 inspection report. CP readings taken by RussMar contract person Marvin Anderson on 11/3/18 identified 10 locations found with low CP readings. RussMar is no longer contracted by EKU.

5. Cathodic Protection *Pipelines installed before August 1, 1971 that is bare or coated are cathodically protected in areas of active corrosion?*

49 CFR 192.457(b)

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

6. Cathodic Protection *Does the cathodic protection system provide a level of cathodic protection that complies with one or more of the applicable criteria contained in Appendix D of the Regulations?*

49 CFR 192.463(a)

Sat +	Sat	Concern	Unsat	NA	NC
			x		

Notes

CP readings taken by RussMar contract person Marvin Anderson on 11/3/18 identified 10 locations found with low CP readings.

PHMSA Question Set

STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

7. Cathodic Protection Does operator test each pipeline that is under cathodic protection at intervals not exceeding 15 months, but at least once each calendar year?

49 CFR 192.465(a)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Date of Last Check:	11/30/2018	Survey performed by:	Marvin Anderson
Notes EKU has 18 points where they take readings. The rectifier was removed in 2017, and anodes were supposed to be installed to provide CP protection. The 2018 pipe to soil readings were conducted on 11/30/18.			

8. Cathodic Protection Are the cathodic protection survey records adequate?

49 CFR 192.465(a)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Cathodic Protection Is each buried pipeline electrically isolated from other underground structures that may cause interference with the cathodic protection system?

49 CFR 192.467(a)

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

10. Cathodic Protection Inspection and electrical tests are made to assure that electrical isolation is adequate?

49 CFR 192.467(d)

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

11. Cathodic Protection Does operator have sufficient test stations or other contact points for electrical measurement purposes?

49 CFR 192.469

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

ACCIDENTS, LEAK SURVEYS, AND ODORIZATION

1. Accidents Are there established procedures for analyzing accidents and failures including samples of the failed facility or equipment for the purpose of determining the cause of the failure and minimizing the possibility of recurrence?

49 CFR 192.617

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes Procedures are in the O&M Plan and the Emergency Plan.
--

PHMSA Question Set
STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

2. Leak Surveys Does operator test each disconnected service line in the same manner as a new service line, before being reinstated?

49 CFR 192.725

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Leak Surveys Does operator disconnect abandoned pipelines from all sources and supplies of gas, purge of gas and seal at the ends?

49 CFR 192.727

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Leak Surveys Does operator lock service lines that are inactive?

49 CFR 192.727

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Leak Surveys Does operator patrol mains where anticipated physical movement or external loading could cause failure or leakage?

49 CFR 192.721

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Date of Last Check: _____ **Survey performed by:** _____

Notes
EKU has identified no areas where patrolling is required.

6. Leak Surveys Are the main patrolling records adequate?

49 CFR 192.721

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

7. Leak Surveys Does operator perform leakage surveys with leak detector equipment with the required intervals?

49 CFR 192.723

Sat +	Sat	Concern	Unsat	NA	NC
		x			

Date of Last Check: 10/15/18 **Survey performed by:** Robert Barrett

Notes
Robert Barrett - RussMar employee performed this in October 2018, and found 5 grade 3 leaks and one valve that was repaired on 10/15/18. Previous leak survey performed July 2017.

PHMSA Question Set

STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

8. Leak Surveys *Are the leakage survey records adequate?*

49 CFR 192.723

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes**9. Odorization** *Is the gas in the operator's pipeline odorized?*

49 CFR 192.625(a)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes Richmond Utilities provides gas to EKU.**10. Leak Surveys** *Does operator have written verification from their gas supplier that the gas has the proper concentration of odorant?*

49 CFR 192.625(f)

Sat +	Sat	Concern	Unsat	NA	NC
	X				

Letter dated October 10, 2002 from Richmond Utilities stating they do not have an odorant injection station within their system. They rely on the odorant injection station that Columbia Gas Transmission has on their system identified as KA 1 LN Lexington. They take sniff tests four times a month at nine different locations within their system one of which is at the EKU purchase station located at the corner of Crabbe Street at the Richmond City Park.

11. Odorization *Does operator conduct periodic (recommend at least once per month) "sniff" tests at the extremities of the system to confirm that the gas contains odorant?*

49 CFR 192.625(f)

Sat +	Sat	Concern	Unsat	NA	NC
			x		

Date of Last Check: 3/13/19**Test performed by:**

Robert Barrett

Notes

Sniff tests were being performed monthly when odorant testing was performed by RussMar. Since the contract with RussMar was discontinued in March 2019, sniff test records indicated that this was not performed in April and May of 2019.

12. Odorization *Are the "sniff" test records adequate?*

49 CFR 192.625(f)

Sat +	Sat	Concern	Unsat	NA	NC
			x		

Notes

Last performed 3/13/19. Sniff tests were being performed monthly when odorant testing was performed by RussMar. Since the contract with RussMar was discontinued in March 2019, sniff test records indicated that this was not performed in April and May of 2019.

OPERATOR QUALIFICATION

PHMSA Question Set

STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

1. Operator Qualification Does operator have a written qualification program (OQ Program)?

49 CFR 192.805

Sat +	Sat	Concern	Unsat	NA	NC
		x			

Notes

There are 3 EKU maintenance employees are trained by RussMar on M5, M7, M11 and M13 tasks to respond in case of emergencies: Inspect, Service and Operate Line Valves, Prevent Accidental Ignition, Recognize and React to Generic Abnormal Operating Conditions, and Investigate Reported gas leaks and odors in buildings.

Since RussMar is no longer is contracted by EKU, the qualification program and re-qualification of EKU maintenance persons a concern.

2. Operator Qualification Does the OQ Program include provisions to identify covered tasks?

49 CFR 192.805

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Operator Qualification Does the OQ Program include provisions to ensure through evaluation that individuals performing covered tasks are qualified?

49 CFR 192.805

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Operator Qualification Does the OQ Program include provisions to allow individuals that are not qualified pursuant to this subpart to perform a covered task if directed and observed by an individual that is qualified?

49 CFR 192.805

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Operator Qualification Does the OQ Program include provisions to evaluate an individual if the operator has reason to believe that the individual's performance of a covered task contributed to an incident as defined in Part 191?

49 CFR 192.805

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Operator Qualification Does the OQ Program include provisions to evaluate an individual if the operator has reason to believe that the individual is no longer qualified to perform a covered task?

49 CFR 192.805

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Question Set
STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

7. Operator Qualification Does the OQ Program include provisions to communicate changes that affect covered tasks to individuals performing those covered tasks?

49 CFR 192.805

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

8. Operator Qualification Does the OQ Program include provisions to identify those covered tasks and the intervals at which evaluation of the individual's qualifications is needed?

49 CFR 192.805

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. Operator Qualification Does operator keep records that demonstrate compliance with OQ regulations?

49 CFR 192.807

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

10. Operator Qualification Does operator's qualification records include identification of qualified individuals?

49 CFR 192.807(a)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

11. Operator Qualification Does operator's qualification records include identification of the covered tasks the individual is qualified to perform?

49 CFR 192.807(a)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

12. Operator Qualification Does operator's qualification records include dates of current qualification?

49 CFR 192.807(a)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

13. Operator Qualification Does operator's qualification records include qualification methods?

49 CFR 192.807(a)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Question Set

STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

14. Operator Qualification Does operator maintain an individual's current qualifications while the individual is performing the covered task?

49 CFR 192.807(b)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

15. Operator Qualification Does operator keep records of prior qualification and records of individuals no longer performing covered tasks for a period of five years?

49 CFR 192.807(b)

Sat +	Sat	Concern	Unsat	NA	NC
					x

Notes Not available for review during the inspection.

16. Operator Qualification Has operator completed the qualification of individuals performing covered tasks?

49 CFR 192.809(b)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

DAMAGE PREVENTION, PUBLIC AWARENESS, LINE MARKERS, AND REGULATOR STATIONS

1. Damage Prevention Is the operator a member of a qualified one-call system (Kentucky 811)?

49 CFR 192.614

Sat +	Sat	Concern	Unsat	NA	NC
		x			

Who located your buried pipelines in the area of excavation activity before the activity begins?

The operator is a member of Kentucky 811. RussMar employees did perform locates, 4 locates performed in 2018.

Is the locator OQ qualified?

RussMar did perform locates for the operator previously, not sure who will be performing locates in the future.

Notes

2. Public Awareness Has the operator developed and implemented a written procedure to provide to its customer's public awareness messages twice annually?

49 CFR 192.616(j)

Sat +	Sat	Concern	Unsat	NA	NC
			x		

Notes Usually sent out by e-mail once a semester, in September and again in Jan. The public awareness message was sent out in September 2018, however it was not sent it out in January 2019. The public awareness message was sent out on 6/6/19. It was recommended that the Public Awareness message be provided to students, faculty, and staff, more than twice a year, not just for the fall and spring semesters, but any time school is in session, including intercession, summer school, and summer camps.

PHMSA Question Set
STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

2. Public Awareness Does the public awareness message include a description of the purpose and reliability of the pipeline?

49 CFR 192.616(j)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Public Awareness Does the public awareness message include an overview of the hazards of the pipeline and prevention measures used?

49 CFR 192.616(j)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. Public Awareness Does the public awareness message include information about damage prevention?

49 CFR 192.616(j)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Public Awareness Does the public awareness message include how to recognize and respond to a leak?

49 CFR 192.616(j)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Public Awareness Does the public awareness message include how to recognize and respond to a leak?

49 CFR 192.616(j)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Public Awareness Does the public awareness message include how to get additional information?

49 CFR 192.616(j)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

7. Line Markers Are line markers placed and maintained along each section of aboveground main in an area accessible to the public?

49 CFR 192.707(c)

No

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Question Set

STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

8. Regulator Stations *Is the operator responsible for the regulator and setting at the source of supply?*

49 CFR 192.739

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

9. Regulator Stations *Are regulators being inspected and tested once each calendar year (not to exceed 15 months)?*

49 CFR 192.739

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

10. Regulator Stations *Do inspection and test records indicate that regulators are in good mechanical condition?*

49 CFR 192.739

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

11. Regulator Stations *Do inspection and test records indicate that regulators are adequate from the standpoint of capacity and reliability of operation for the service in which it is employed?*

49 CFR 192.739

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

12. Regulator Stations *Do inspection and test records indicate that regulators are set to function at the correct pressure?*

49 CFR 192.739

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

13. Regulator Stations *Do inspection and test records indicate that regulators are properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation?*

49 CFR 192.739

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

14. Regulator Stations *Are regulator inspections being performed by an individual that is OQ qualified?*

49 CFR 192.739

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Question Set

STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

DISTRIBUTION INTEGRITY MANAGEMENT (DIMP)

1. DIMP Has the operator developed and implemented an IM program?

49 CFR 192.1015(a)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

2. DIMP Does the IM program include a written plan?

49 CFR 192.1015(a)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

Effective date of DIMP plan was 9/11/2014. Last reviewed on 3-5-18 by former RussMar employee Zane Salyers.

3. DIMP Does the written plan address knowledge of pipeline system, including approximate location and material, and a plan for gaining knowledge through normal activities conducted on the pipeline (i.e. design, construction, O and M)?

49 CFR 192.1015(b)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

4. DIMP Does the written plan address identification of threats (existing or potential) including corrosion, natural forces, excavation damage, other outside force damage, material weld failure, equipment failure, and incorrect operation?

49 CFR 192.1015(b)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. DIMP Does the written plan rank risks (the operator must evaluate the risks to its pipeline and estimate the relative importance of each identified threat)?

49 CFR 192.1015(b)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes The number one threat listed is excavation damage.

6. DIMP Does the written plan identify and implement measures designed to reduce the risks from failure of its pipeline?

49 CFR 192.1015(b)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

7. DIMP Does the written plan measure performance, monitor results, and evaluate effectiveness, including the number of leaks eliminated or repaired on its pipeline and their causes?

49 CFR 192.1015(b)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes Robert Barrett – RussMar employee performed this in October 2018, and found 5 grade 3 leaks and one valve that was repaired on 10/15/18. Previous leak survey performed July 2017. Not sure who will be performing leakage surveys going forward. Not sure who will be responsible for monitoring DIMP plan going forward.

8. DIMP Does the written plan address the operation determination of the appropriate period for conducting IM program evaluations and re-evaluation of the entire program at least every five (5) years?

49 CFR 192.1015(b)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

9. DIMP Has the operator maintained the following records for a period of at least 10 years: A written IM plan in accordance with this section, including superseded IM plans?

49 CFR 192.1015(c)

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

10. DIMP Has the operator maintained the following records for a period of at least 10 years: Documents supporting threat identification?

49 CFR 192.1015(c)

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

11. DIMP Has the operator maintained the following records for a period of at least 10 years: Documents showing the location and material of all piping and appurtenances installed after the effective date of its IM program and, to the extent known, the location and material of all pipe and appurtenances that were existing on the effective date of its pro?

49 CFR 192.1015(c)

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

FIELD INSPECTION

1. Field Inspection Is each meter and service regulator installed in a readily accessible location and protected from corrosion and other damage (including vehicular damage) that may be anticipated?

49 CFR 192.353(a)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

2. Field Inspection *Is each service regulator, installed with a building, located as near as practical to the point of service line entrance?*

49 CFR 192.353(b)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

3. Field Inspection *Is each meter, installed within a building, located in a ventilated place and not less than 3 feet from any source of ignition or any source of heat which might damage the meter?*

49 CFR 192.353(c)

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes
No inside meters.

4. Field Inspection *Do service regulator vents and relief vents terminate outdoors?*

49 CFR 192.355(b)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

5. Field Inspection *Are service regulator vents and relief vents rain and insect resistant?*

49 CFR 192.355(b)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

6. Field Inspection *Are service regulator vents and relief vents located at a place where gas from the vent can escape freely into the atmosphere and away from an opening into the building?*

49 CFR 192.355(b)

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

7. Field Inspection *Are service regulator vents and relief vents protected from damage caused by submergence in areas where flooding may occur?*

49 CFR 192.355(b)

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

8. Field Inspection *Are any meter sets found where customers are abusing meters?*

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes
No

PHMSA Question Set
STANDARD INSPECTION REPORT OF A MASTER METER OPERATOR

9. Field Inspection *Were any leaks found during the field inspection? Leak detector equipment used? Vegetation?*

49 CFR 192.723

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

There was no leak inspection performed during the field inspection.

10. Field Inspection *Were main line valves located and marked?*

49 CFR 192.707

Sat +	Sat	Concern	Unsat	NA	NC
	x				

Notes

11. Field Inspection *Are line markers placed and maintained along each section of aboveground main in an area accessible to the public?*

49 CFR 192.707

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

None

12. Field Inspection *Is information on line markers correct and legible?*

49 CFR 192.707

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

13. Field Inspection *Is a fire extinguisher provided when a hazardous amount of gas is being vented into open air?*

49 CFR 192.751(a)

Sat +	Sat	Concern	Unsat	NA	NC
				x	

Notes

OPERATOR QUALIFICATION FIELD INSPECTION PROTOCOL FORM

Inspection Date(s):	6/4/19
Name of Operator:	Eastern Kentucky University
Operator ID (OPID):	n/a
Supervisor(s) Contacted:	Tim Wiseman
# Qualified Employees Observed:	1
# Qualified Contractors Observed:	0

Individual Observed	Title/Organization	Phone Number	Email Address
Tim Wiseman	Utility Compliance Coordinator	859-248-4385	Timothy.wiseman@eku.edu

To add rows, press TAB with cursor in last cell.

PHMSA/State Representative	Region/State	Email Address
Scott Morris	Southern/Kentucky	Scotta.morris@ky.gov

To add rows, press TAB with cursor in last cell.

Remarks:

A table for recording specific tasks performed and the individuals who performed the tasks is on the last page of this form. This form is to be uploaded on to the OQBD for the appropriate operator, then imported into the file.

9.1 Covered Task Performance

Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.

9.01 Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	Qualified for: Inspect, Service and Operate Line Valves on 9/15/16 6 critical valves on EKU campus
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

9.2 Qualification Status

Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.

9.02 Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	OQ trained on 9/15/16 for: M5, M7, M11 and M13 tasks to respond in case of emergencies: Inspect, Service and Operate Line Valves, Prevent Accidental Ignition, Recognize and React to Generic Abnormal Operating Conditions, and Investigate Reported gas leaks and odors in buildings.
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

9.3 Abnormal Operating Condition Recognition and Reaction

Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.

9.03 Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	OQ trained on 9/15/16 for: M5, M7, M11 and M13 tasks to respond in case of emergencies: Inspect, Service and Operate Line Valves, Prevent Accidental Ignition, Recognize and React to Generic Abnormal Operating Conditions, and Investigate Reported gas leaks and odors in buildings.
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

9.4 Verification of Qualification

Verify the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.

9.04 Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	OQ trained on 9/15/16 for: M5, M7, M11 and M13 tasks to respond in case of emergencies: Inspect, Service and Operate Line Valves, Prevent Accidental Ignition, Recognize and React to Generic Abnormal Operating Conditions, and Investigate Reported gas leaks and odors in buildings.
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

9.5 Program Inspection Deficiencies

Have potential issues identified by the headquarters inspection process been corrected at the operational level?

9.05 Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

Field Inspection Notes

The following table is provided for recording the covered tasks observed and the individuals performing those tasks.

No	Task Name	Name/ID of Individual Observed			Comments
		Correct Performance (Y/N)	Correct Performance (Y/N)	Correct Performance (Y/N)	
1	Emergency shut off valves	Y			
2					
3					
4					
5					
6					
7					
8					

Operations and Maintenance Records Review

If performing an operations and maintenance records review in the course of your inspection, please review a sample of the qualifications of the individuals performing those O&M tasks that are covered under Operator Qualification and check the records for compliance to 192.807 or 195.507.

192.807 or 195.507	Records supporting an individual's current qualifications shall be maintained while the individual is performing the covered task. Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five years.	Sat.	Unsat.	Not Checked
		x		
	Comments: OQ trained on 9/15/16 for: M5, M7, M11 and M13 tasks to respond in case of emergencies: Inspect, Service and Operate Line Valves, Prevent Accidental Ignition, Recognize and React to Generic Abnormal Operating Conditions, and Investigate Reported gas leaks and odors in buildings.			

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