

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

CITY OF DRAKESBORO D/B/A)	
DRAKESBORO NATURAL GAS)	
COMPANY)	
_____)	CASE NO.
)	2019-00065
ALLEGED FAILURE TO COMPLY WITH)	
KRS 278.495, 807 KAR 5:027, AND 49)	
C.F.R. PART 192)	

ORDER

The city of Drakesboro is located in Muhlenberg County, Kentucky. Drakesboro, d/b/a Drakesboro Natural Gas Company (Drakesboro), owns and operates facilities used to distribute natural gas at retail and is subject to the Commission's jurisdiction under KRS 278.495(2) to enforce minimum safety standards adopted by the United States Department of Transportation pursuant to the federal pipeline safety laws, 49 U.S.C. Section 60101, *et seq.*

On February 18-21, 2019, Commission Staff (Staff) conducted a standard periodic inspection of the city of Drakeboro's natural gas distribution system. Following its review of Drakesboro's facilities, operations, and management practices, Staff prepared an Inspection Report dated February 26, 2019, a copy of which is attached as an Appendix to this Order. As outlined in its Report, Staff identified the following violations of federal pipeline safety standards during its inspection of the city's gas distribution system:

1. Drakesboro's written procedural manual for operations and maintenance activities does not include all procedures required by **49 CFR §192.605**.

2. Drakesboro's plan to minimize the hazard resulting from a gas pipeline emergency does not include all procedures required by **49 CFR §192.615**.
3. Drakesboro does not have a written program to prevent damage to underground pipelines from excavation activities as required by **49 CFR §192.614**.
4. Drakesboro does not have a written public education program as required by **49 CFR § 192.616**.
5. Drakesboro does not have a written anti-drug plan as required by **49 CFR § 199.101**.
6. Drakesboro does not have a written alcohol misuse plan as required by **49 CFR § 199.202**.
7. Drakesboro has not conducted drug tests as required by **49 CFR § 199.105**.
8. Drakesboro has not provided training for supervisory personnel who will determine whether an employee must be drug tested based on reasonable cause as required by **49 CFR § 199.113(c)**.
9. Drakesboro does not have a written distribution integrity management plan as required by **49 CFR § 192.1005**.
10. Drakesboro does not have welding procedures as required by **49 CFR § 192.225**.
11. Drakesboro does not have written plastic-joining procedures as required by **49 CFR § 192.273(b)**.
12. Drakesboro's operator qualification program does not meet the requirements of **49 CFR § 192.805**.
13. Drakesboro has not submitted annual reports as required by **49 CFR § 191.11**.
14. Drakesboro has not sent the customer notification required by **49 CFR § 192.16**.
15. Drakesboro has not sent public awareness messages as required by **49 CFR § 192.616**.

16. Drakesboro has not trained appropriate operating personnel to ensure they are knowledgeable of emergency procedures as required by **49 CFR § 192.615(b)(2)**.
17. Drakesboro did not establish and maintain liaison with appropriate fire, police, and other public officials as required by **49 CFR § 192.615(c)**.
18. Drakesboro does not review or update its operation and maintenance plan as required by **49 CFR § 192.605 (a)**.
19. Drakesboro has not conducted periodic sampling of combustible gases in its distribution lines to assure the proper concentration of odorant test as required by **49 CFR § 192.625(f)** since November 2017.
20. Drakesboro has not conducted patrolling of its distribution mains as required by **49 CFR § 192.721** since 2017.
21. Drakesboro has not conducted a leakage survey in its business district as required by **49 CFR § 192.723** since 2017. Additionally, Jordon Shaw, the employee listed on the record of the 2017 survey as having conducted the survey, verified to Staff on February 7, 2019, that he did not conduct the leak survey.
22. Drakesboro has not conducted regulator/relief valve inspections as required by **49 CFR § 192.739**.
23. Drakesboro has not conducted valve inspections as required by **49 CFR § 192.747** since 2016.
24. Drakesboro has not tested pipelines under cathodic protection as required by **49 CFR § 192.465(a)**.
25. Drakesboro has not conducted cathodic protection rectifier inspections as required by **49 CFR § 192.465(b)**.
26. Drakesboro has not conducted atmospheric corrosion inspections as required by **49 CFR § 192.481**.
27. Drakesboro's pipeline markers do not meet the requirements of **49 CFR § 192.707**.
28. Drakesboro failed to ensure that individuals performing covered tasks were qualified as required by **49 CFR § 192.805(b)**. At the time of Staff's inspection, two employees of Drakesboro who were not properly qualified were performing covered tasks. Staff also received a report from a

customer that prisoners turned on the gas service and entered the home to relight appliances.

29. Drakesboro did not properly repair a damaged plastic main on Wyatt's Chapel Road as required by **49 CFR § 192.311**.
30. Drakesboro did not ensure that combustible gas in its distribution lines was properly odorized as required by **49 CFR § 192.625(a)**.
31. Drakesboro failed to follow procedures in its emergency plan in response to two reports of gas detected inside and outside of homes as required by **49 CFR § 192.605(a)**.
32. Drakesboro has not offered excess flow valves to existing customers as required by **49 CFR § 192.383(d)**.
33. Drakesboro has failed to ensure that each person making joints in plastic pipelines is qualified as required by **49 CFR § 192.285**.
34. Drakesboro has failed to maintain, for the useful life of each pipeline, records of each test performed under 49 CFR Subpart J as required by **49 CFR 192.517**.
35. Drakesboro has failed to keep records of the following procedures as required by **49 CFR § 192.603(b)**:
 - Installation of new service lines;
 - Installation of excess flow valves;
 - Response to and repair of leaking pipelines;
 - Atmospheric corrosion inspections;
 - Odorant tests (2018 and 2019);
 - Patrolling of distribution mains (2018);
 - Leak surveys (2018);
 - Valve inspections (2018 and 2019);
 - Pipe-to-soil readings (2018); and
 - Cathodic protection rectifier inspections (2018).

KRS 278.992(1) provides that any person who violates any federal minimum pipeline safety standard 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 as contained in 49 CFR § 190.223, as amended, for each violation for each day that the violation persists. The maximum civil penalty under 49 CFR § 190.223 is \$213,268 per violation per day, not to exceed \$2,132,679 for any related series of violations. For the 35 alleged violations identified in the Inspection Report, Drakesboro is subject under KRS 278.992(1) to an assessment of a civil penalty up to \$7,464,380 without considering the continuing nature of certain alleged violations.

Based on its review of the Staff Report and being otherwise sufficiently advised, the Commission finds that *prima facie* evidence exists that the Drakesboro has failed to comply with state and federal minimum pipeline safety standards. The Commission further finds that it should conduct a formal investigation into the operation of the Drakesboro gas distribution system and that this investigation should examine the adequacy, safety, and reasonableness of Drakesboro's practices related to the construction, installation, maintenance, and operation of natural gas facilities.

The Commission, on its own motion, HEREBY ORDERS that:

1. Drakesboro shall submit to the Commission, by the close of business on Friday, March 1, 2019, a written response to the allegations contained in the Staff Report.
2. In addition to addressing the specific allegations and findings of violation in the Staff Report, Drakesboro shall state in its response whether it has entered into a written contract with a qualified third party to operate and maintain the city's gas system or it shall shut down operation of the system.

3. Drakesboro shall appear on March 8, 2019, at 10 a.m., Eastern Standard Time, in Hearing Room 1 of the Commission's offices at 211 Sower Boulevard in Frankfort, Kentucky, for the purpose of presenting evidence concerning the alleged violations of 49 C.F.R. Part 192 and 807 KAR 5:027, and of showing cause why it should not be subject to the penalties prescribed in KRS 278.992(1) for these alleged violations.

4. If Drakesboro states in its response to this Order that either it has contracted with a qualified third party to operate and maintain its gas system or it has shut down operation of the system, the hearing set in the preceding paragraph may be continued for good cause and rescheduled by the Commission at a later date.

5. At the scheduled hearing in this matter, Drakesboro shall also present evidence on the adequacy, safety, and reasonableness of its practices related to the construction, installation, maintenance, and operation of natural gas facilities.

6. The March 8, 2019 hearing shall be recorded by digital video recording only.

7. The Staff Report attached as an Appendix to this Order is made a part of the record in this case.

8. This Order shall be served by electronic mail to drakesboro@comcast.net and by certified mail to:

Drakesboro Natural Gas Company
212 Mose Rager Boulevard
P.O. Box 129
Drakesboro, KY 42337

By the Commission

ENTERED
FEB 28 2019
KENTUCKY PUBLIC
SERVICE COMMISSION

ATTEST:


Executive Director

APPENDIX

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE
COMMISSION IN CASE NO. 2019-00065 DATED **FEB 28 2019**

EIGHTY-ONE PAGES TO FOLLOW

INSPECTION REPORT

INSPECTION INFORMATION

KY PSC Inspector(s):	Melissa Holbrook and David Nash	Report Number:	Drakesboro-02262019
Inspection Date(s):	2-7/18-21-2019	Report Date:	2-26-2019
Inspection Type:	<input checked="" type="checkbox"/> Standard <input type="checkbox"/> Integrity Management <input type="checkbox"/> Operator Qualification <input type="checkbox"/> Compliance Follow-up <input type="checkbox"/> Construction		

OPERATOR INFORMATION

Name of Operator:	City of Drakesboro	OP ID No.: (If no OP ID No., explain if an application has been submitted.)	Unknown
Type of Facility:	Municipal	Location of Facility:	City of Drakesboro
Area of Operation:	City of Drakesboro		
Official Operator Contact and Address: (Contact for Inspection Letter)		Unit Name and Address	
Mayor Mike Jones P.O. Box 129 Drakesboro, KY 42337			
Phone # and Email:	270-476-8986 jonesy0120@gmail.com		
Records Location:	Drakesboro Fire Dept.		

Persons Interviewed	Title	Phone No.	Email
Mike Jones	Mayor	270-543-6425	Jonesy0120@gmail.com
Larry Shrodes	Councilman	270-543-3989	Larryshrodes1953@gmail.com
Danny Miller	Contractor for city osha epa	270-543-4160	info@national/safetyllc.net
Joe Studer	Councilman	270-225-8282	Joe.studer@comcast.net
Donald Dee Sims Jr.	Drakesboro Employee	270-820-6439	Deeius8308@gmail.com

Has the Operator provided an updated Emergency Contact List?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
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Number of Customers:	667		
Number of Gas Employees:	2		
Gas Supplier:	Texas Gas		
Unaccounted for Gas:	Unknown		
Services:	Unknown		
Operating Pressure(s):	MAOP (within last year)	Actual Operating Pressure (at time of inspection)	
	Feeder:	Unknown	
	Town:		
Other:			

Does the Operator have any transmission pipeline (above 20% SMYS):	n/a
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Additional Operator Information:

Date of Last Inspection:	5-3-2017		
Number of Deficiencies:	1	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 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	
<u>Other:</u>		

<u>State Question Set</u>	
<input checked="" type="checkbox"/> Cybersecurity	<input type="checkbox"/> Other
<u>Other:</u>	

Summary

The 2019 standard inspection for City of Drakesboro was conducted at the Fire Department in Drakesboro, KY. The 2017 inspection resulted in one deficiency and have been cleared.

The inspection consisted of an opening conference which reviewed what the inspection would entail with Mayor Mike Jones, Council Members Larry Shrodes, and Joe Studer, Dee Sims- Drakesboro Employee, Danny Miller-OSHA Contractor, and Jeanetta Turner- Gas Compliance Contractor.

The office portion of the inspection consisted of the following: a detailed review of operation and maintenance, emergency, damage prevention, operator qualification, drug and alcohol, distribution integrity management, and public awareness plans. Also, reviewed were all 2016-2019 records pertaining to leakage surveys and repairs, 3rd party damage, valve inspections, patrolling, atmospheric corrosion, regulator inspections, cathodic protection, public awareness, and odorant verifications.

The Field portion of inspection consisted of visiting Purchase Point- Also, inspected was field review of pipeline markers, meter sets, mainline valves, and aboveground signage. An Operator Qualification protocol 9 was not conducted due to no operator qualified employee could perform covered tasks.

Deficiencies

1. Drakesboro's written procedural manual for operations and maintenance activities does not include all procedures required by **49 CFR §192.605**. The missing items are highlighted in red.
2. Drakesboro's plan to minimize the hazard resulting from a gas pipeline emergency does not include all procedures required by **49 CFR §192.615**. The missing items are highlighted in red.
3. Drakesboro does not have a written program to prevent damage to underground pipelines from excavation activities as required by **49 CFR §192.614**.
4. Drakesboro does not have a written public education program as required by **49 CFR § 192.616**.
5. Drakesboro does not have a written anti-drug plan as required by **49 CFR § 199.101**.
6. Drakesboro does not have a written alcohol misuse plan as required by **49 CFR § 199.202**.
7. Drakesboro has not conducted drug tests as required by **49 CFR § 199.105**.
8. Drakesboro has not provided training for supervisory personnel who will determine whether an employee must be drug tested based on reasonable cause as required by **49 CFR § 199.113 (c)**.
9. Drakesboro does not have a written distribution integrity management plan as required by **49 CFR § 192.1005**.
10. Drakesboro does not have welding procedures as required by **49 CFR § 192.225**.
11. Drakesboro does not have written plastic joining procedures as required by **49 CFR § 192.273(b)**.
12. Drakesboro's operator qualification program does not meet the requirements of **49 CFR § 192.805**. The missing items are highlighted in red.
13. Drakesboro has not submitted annual reports as required by **49 CFR § 191.11**.
14. Drakesboro has not sent the customer notification required by **49 CFR § 192.16**.
15. Drakesboro has not sent public awareness messages as required by **49 CFR § 192.616**.
16. Drakesboro has not trained appropriate operating personnel to ensure they are knowledgeable of emergency procedures as required by **49 CFR § 192.615(b)(2)**.

17. Drakesboro did not establish and maintain liaison with appropriate fire, police, and other public officials as required by **49 CFR § 192.615(c)**.
18. Drakesboro does not review or update its operation and maintenance plan as required by **49 CFR § 192.605 (a)**.
19. Drakesboro has not conducted periodic sampling of combustible gases in its distribution lines to assure the proper concentration of odorant test as required by **49 CFR § 192.625(f)** since November 2017.
20. Drakesboro has not conducted patrolling of its distribution mains as required by **49 CFR § 192.721** since 2017.
21. Drakesboro has not conducted a leakage survey in its business district as required by **49 CFR § 192.723** since 2017. Additionally, the employee who is listed on the record of the 2017 survey as having conducted the survey, Jordon Shaw, verified to Staff on February 7, 2019, that he did not conduct the leak survey.
22. Drakesboro has not conducted regulator/relief valve inspections as required by **49 CFR § 192.739**.
23. Drakesboro has not conducted valve inspections as required by **49 CFR § 192.747** since 2016.
24. Drakesboro has not tested pipelines under cathodic protection as required by **49 CFR § 192.465 (a)**.
25. Drakesboro has not conducted cathodic protection rectifier inspections as required by **49 CFR § 192.465 (b)**.
26. Drakesboro has not conducted atmospheric corrosion inspections as required by **49 CFR § 192.481**.
27. Drakesboro's pipeline markers do not meet the requirements of **49 CFR § 192.707**. Numerous pipeline markers in field were unable to read.
28. Drakesboro failed to ensure that individuals performing covered tasks were qualified as required by **49 CFR § 192.805(b)**. At the time of Staff's inspection, two employees of Drakesboro who were not properly qualified were performing covered tasks. Staff also received a report from a customer that prisoners turned on gas service and entered the home to relight appliances.
29. Drakesboro did not properly repair a damaged plastic main on Wyatt's Chapel Road as required by **49 CFR § 192.311**. Operator repaired a 2inch plastic main with a clamp.

30. Drakesboro did not ensure that combustible gas in its distribution lines was properly odorized as required by **49 CFR § 192.625(a)**. A 3rd party contractor conducted odor test and verified there was no odorant in the gas system.
31. Drakesboro failed to follow procedures in its emergency plan in response to two reports of gas detected inside and outside of homes as required by **CFR § 192.605(a)**.
32. Drakesboro has not offered excess flow valves to existing customers as required by **49 CFR § 192.383(d)**.
33. Drakesboro has failed to ensure that each person making joints in plastic pipelines is qualified as required by **49 CFR § 192.285**.
34. Drakesboro has failed to maintain for the useful life of each pipeline records of each test performed under 49 CFR Subpart J as required by **49 CFR 192.517**.
35. Drakesboro has failed to keep records of the following procedures as required by **49 CFR § 192.603(b)**:
 - Installation of new service lines;
 - Installation of excess flow valves;
 - Response to and repair of leaking pipelines;
 - Atmospheric corrosion inspections;
 - Odorant tests (2018 and 2019);
 - Patrolling of distribution mains (2018);
 - Leak surveys (2018);
 - Valve inspections (2018 and 2019);
 - Pipe-to-soil readings (2018); and
 - Cathodic protection rectifier inspections (2018).

Inspector Comments

The closing conference was conducted with the following: Mayor Mike Jones, PSC Staff- David Nash, Council Members- Larry Shrodes, Joe Studer, Scott Newman, Turner Compliance- Jeanetta Turner, Vanguard Employee- Jason Greever, and Vanguard President- Josh Devall. Frank Schmautz- Council Member was unable to attend but stopped by the day before to check on progress of inspection. The findings of the inspection was reviewed during the closing conference.

PSC staff met with Mayor Mike Jones February 7, 2019 staff recommended to Mayor to contract 3rd party contractor to support and maintain gas. Mayor Jones contacted and retained 3rd party contractor Vanguard. Vanguard has been maintaining gas system as of February 8, 2019. But, as of closing conference no contract or financial commitment has been made to Vanguard.

Submitted By:

Melissa C. Holbrook

Melissa Holbrook 2-26-2019
Utility Regulatory and Safety Investigator

Procedures - Reporting *

*** 1. Immediate Reporting: Incidents (detail)** *Is there a process to immediately report incidents to the National Response Center? (RPT.RR.IMMEDREPORT.P) (detail)*

191.5(b) (191.7)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Appendix I

*** 2. Incident Reports (detail)** *Does the process require preparation and filing of an incident report as soon as practicable but no later than 30 days after discovery of a reportable incident? (RPT.RR.INCIDENTREPORT.P) (detail)*

191.15(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Appendix I

3. Supplemental Incident Reports (detail) *Does the process require preparation and filing of supplemental incident reports? (RPT.RR.INCIDENTREPORTSUPP.P) (detail)*

191.15(c)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Appendix I

*** 4. National Registry of Pipeline and LNG Operators (OPID) (detail)** *Does the process require the obtaining, and appropriate control, of Operator Identification Numbers (OPIDs)? (RPT.RR.OPID.P) (detail)*

191.22

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Appendix I pg 2

5. Safety Related Condition Reports (detail) *Do the procedures require reporting of safety-related conditions? (RPT.RR.SRCR.P) (detail)*

192.605(a) (191.23(a); 191.25(a); 191.25(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Sec 109

6. Offshore Pipeline Condition Reports (detail) *Does the process require reports to be submitted within 60 days after completing inspection of underwater pipelines in GOM and its inlets? (RPT.RR.OPCR.P) (detail)*

191.27(a) (191.27(b); 192.612(a))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

7. Safety Related Conditions (detail) *Does the process include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that may potentially be safety-related conditions? (MO.GO.SRC.P) (detail)*

192.605(d)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
Sec 109

Procedures - Customer and EFV Installation Notification

1. Customer Notification (detail) *Is a customer notification process in place that satisfies the requirements of 192.16? (MO.GO.CUSTNOTIFY.P) (detail)*

192.13(c) (192.16(a); 192.16(b); 192.16(c); 192.16(d))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
Appendix I pg 3

2. EFV Installation (detail) *Is there an adequate excess flow valve (EFV) installation and performance program in place? (MO.GO.EFVINSTALL.P) (detail)*

192.383(b) (192.381(a); 192.381(b); 192.381(c); 192.381(d); 192.381(e); 192.383(a); 192.383(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Appendix I pg 3 need to add updated requirements

Procedures - Normal Operating And Maintenance

1. Normal Maintenance and Operations (detail) *Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year? (MO.GO.OMANNUALREVIEW.P) (detail)*

192.605(a)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
Preface

2. Normal Operations and Maintenance Procedures - History (detail) *Does the process include requirements for making construction records, maps and operating history available to appropriate operating personnel? (MO.GO.OMHISTORY.P) (detail)*

192.605(a) (192.605(b)(3))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

3. Normal Operations and Maintenance Procedures (detail) *Does the process include procedures for starting up and shutting down any part of the pipeline in a manner to assure operation with the MAOP limits, plus the build-up allowed for operation of pressure-limiting and control devices? (MO.GOMAOP.MAOPLIMIT.P) (detail)*

192.605(a) (192.605(b)(5))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

4. Normal Operations and Maintenance Procedures - Review (detail) *Does the process include requirements for periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operations and maintenance and modifying the procedures when deficiencies are found? (MO.GO.OMEFFECTREVIEW.P) (detail)*

192.605(a) (192.605(b)(8))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

5. Safety While Making Repairs (detail) *Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property? (AR.RMP.SAFETY.P) (detail)*

192.605(b)(9) (192.713(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

6. Holders (detail) *Does the process include systematic and routine testing and inspection of pipe-type or bottle-type holders? (MO.GM.HOLDER.P) (detail)*

192.605(a) (192.605(b)(10))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

7. Gas Odor Response (detail) *Does the process require prompt response to the report of a gas odor inside or near a building? (MO.GO.ODDOR.P) (detail)*

192.605(a) (192.605(b)(11))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
Sec 108

Procedures - Change In Class Location

1. Change in Class Location Required Study (detail) *Does the process include a requirement that the operator conduct a study whenever an increase in population density indicates a change in the class location of a pipeline segment operating at a hoop stress that is more than 40% SMYS? (MO.GOCLASS.CLASSLOCATESTUDY.P) (detail)*

192.605(b)(1) (192.609(a); 192.609(b); 192.609(c);
192.609(d); 192.609(e); 192.609(f))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

*** 2. Change in Class Location Confirmation or Revision of MAOP (detail)** *Does the process include a requirement that the MAOP of a pipeline segment be confirmed or revised within 24 months whenever the hoop stress corresponding to the established MAOP is determined not to be commensurate with the existing class location? (MO.GOCLASS.CLASSLOCATEREV.P) (detail)*

192.605(b)(1) (192.611(a); 192.611(b); 192.611(c);
192.611(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Continuing Surveillance

1. Continuing Surveillance (detail) *Does the process include procedures for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists? (MO.GO.CONTSURVEILLANCE.P) (detail)*

192.605(e) (192.613(a); 192.613(b); 192.703(b); 192.703(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Procedures - Damage Prevention Program

1. Damage Prevention Program (detail) *Is a damage prevention program approved and in place? (PD.OCC.PDPROGRAM.P) (detail)*

192.614(a)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Needs to be more detailed and meet code requirements

Procedures - Emergency

1. Receiving Notices (detail) Does the emergency plan include procedures for receiving, identifying, and classifying notices of events which need immediate response? (EP.ERG.NOTICES.P) (detail)

192.615(a)(1)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Not in detail

2. Emergency Response Communication (detail) Does the emergency plan include procedures for establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials? (EP.ERG.COMMSYS.P) (detail)

192.615(a) (192.615(a)(2))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Not in detail

*** 3. Emergency Response (detail)** Does the emergency plan include procedures for making a prompt and effective response to a notice of each type of emergency, including gas detected inside or near a building, a fire or explosion near or directly involving a pipeline facility, or a natural disaster? (EP.ERG.RESPONSE.P) (detail)

192.615(a) (192.615(a)(3); 192.615(a)(11); 192.615(b)(1))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

4. Emergency Response (detail) Does the process include procedures for ensuring the availability of personnel, equipment, tools, and materials as needed at the scene of an emergency? (EP.ERG.READINESS.P) (detail)

192.615(a) (192.615(a)(4))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Sec 121.4

In plan no list of equipment listed

5. Emergency Response - Actions (detail) Does the emergency plan include procedures for taking actions directed toward protecting people first and then property? (EP.ERG.PUBLICPRIORITY.P) (detail)

192.615(a) (192.615(a)(5))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Sec 121

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

6. Emergency Response (detail) Does the emergency plan include procedures for the emergency shutdown or pressure reduction in any section of pipeline system necessary to minimize hazards to life or property? (EP.ERG.PRESSREDUCESD.P) (detail)

192.615(a) (192.615(a)(6))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
Sec 121.4

7. Emergency Response - Hazards (detail) Does the emergency plan include procedures for making safe any actual or potential hazard to life or property? (EP.ERG.PUBLICHAZ.P) (detail)

192.605(a) (192.615(a)(7))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
Sec 121.4

8. Public Official Notification (detail) Does the emergency plan include procedures for notifying appropriate public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency? (EP.ERG.AUTHORITIES.P) (detail)

192.615(a) (192.615(a)(8))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes
Not in detail
Sec 124.143

9. Service Outage Restoration (detail) Does the emergency plan include procedures for safely restoring any service outage? (EP.ERG.OUTAGERESTORE.P) (detail)

192.615(a) (192.615(a)(9))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes
Sec 124.2 not in detail

10. Incident Investigation Actions (detail) Does the process include procedures for beginning action under §192.617, if applicable, as soon after the end of the emergency as possible? (EP.ERG.INCIDENTACTIONS.P) (detail)

192.615(a) (192.615(a)(10))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Sec 126 not detail

11. Emergency Response Training (detail) Does the process include training of the appropriate operating personnel to assure they are knowledgeable of the emergency procedures and verifying that the training is effective? (EP.ERG.TRAINING.P) (detail)

192.615(b)(2)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
Sec 127

12. Emergency Response Performance (detail) *Does the process include detailed steps for reviewing employee activities to determine whether the procedures were effectively followed in each emergency? (EP.ERG.POSTEVTREVIEW.P) (detail)*

192.615(b)(3)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

13. Liaison with Public Officials (detail) *Does the process include steps for establishing and maintaining liaison with appropriate fire, police and other public officials and utility owners? (EP.ERG.LIAISON.P) (detail)*

192.615(c) (192.615(c)(1); 192.615(c)(2); 192.615(c)(3); 192.615(c)(4); ADB-05-03)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

In plan sec 125 need to be in detail

Procedures - Public Awareness Program

1. Public Education Program (detail) *Has the continuing public education (awareness) program been established as required? (PD.PA.PROGRAM.P) (detail)*

192.616(a) (192.616(h))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No plan could be produced at the time of inspection

2. Management Support of Public Awareness Program (detail) *Does the operator's program documentation demonstrate management support? (PD.PA.MGMTSUPPORT.P) (detail)*

192.616(a) (API RP 1162 Section 2.5; API RP 1162 Section 7.1)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No plan could be produced at the time of inspection

3. Asset Identification (detail) *Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each? (PD.PA.ASSETS.P) (detail)*

192.616(b) (API RP 1162 Section 2.7 Step 4)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No plan could be produced at the time of inspection

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

4. Audience Identification (detail) Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents? (PD.PA.AUDIENCEID.P) (detail)

192.616(d) (192.616(e); 192.616(f); API RP 1162 Section 2.2; API RP 1162 Section 3)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No plan could be produced at the time of inspection

5. Messages, Delivery Methods, and Frequencies (detail) Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where gas is transported? (PD.PA.MESSAGES.P) (detail)

192.616(c) (API RP 1162 Section 3; API RP 1162 Section 4; API RP 1162 Section 5)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No plan could be produced at the time of inspection

6. Consideration of Supplemental Enhancements (detail) Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162? (PD.PA.SUPPLEMENTAL.P) (detail)

192.616(c) (API RP 1162 Section 6.2)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes No plan could be produced at the time of inspection

7. Other Languages (detail) Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas? (PD.PA.LANGUAGE.P) (detail)

192.616(g) (API RP 1162 Section 2.3.1)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No plan could be produced at the time of inspection

8. Evaluation Plan (detail) Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated? (PD.PA.EVALPLAN.P) (detail)

192.616(i) (192.616(c); API RP 1162 Section 8; API RP 1162 Appendix E)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No plan could be produced at the time of inspection

9. Master Meter and Petroleum Gas Systems (detail) *Does the master meter or petroleum gas system operator's process meet the requirements of 192.616(j)? (PD.PA.MSTRMETER.P) (detail)*

192.616(j) (192.616(h))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Failure Investigation

1. Incident Investigation (detail) *Does the process include procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of recurrence? (EP.ERG.INCIDENTANALYSIS.P) (detail)*

192.617

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not detailed in plan

Procedures - MAOP

1. Maximum Allowable Operating pressure Determination (detail) *Does the process include procedures for determining the maximum allowable operating pressure for a pipeline segment in accordance with 192.619? (MO.GOMAOP.MAOPDETERMINE.P) (detail)*

192.605(b)(1) (192.619(a); 192.619(b); 192.621(a); 192.621(b); 192.623(a); 192.623(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Sec 135 not detailed in plan

Procedures - Pressure Test

1. Test Acceptance Criteria and Procedures (detail) *Were test acceptance criteria and procedures sufficient to assure the basis for an acceptable pressure test? (AR.PTI.PRESSTESTACCEP.P) (detail)*

192.503(a) (192.503(b); 192.503(c); 192.503(d); 192.505(a); 192.505(b); 192.505(c); 192.505(d); 192.505(e); 192.507(a); 192.507(b); 192.507(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan

Procedures - Odorization Of Gas

1. Odorization of Gas (detail) *Does the process ensure appropriate odorant levels are contained in its combustible gases in accordance with §192.625? (MO.GOODOR.ODORIZE.P) (detail)*

192.605(b)(1) (192.625(a); 192.625(b); 192.625(c);
192.625(d); 192.625(e); 192.625(f))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Not in detail how often taking tests
Sec 103

Procedures - Tapping Pipelines Under Pressure

1. Tapping Pipelines Under Pressure (detail) *Is the process adequate for tapping pipelines under pressure? (AR.RMP.HOTTAP.P) (detail)*

192.605(b)(1) (192.627)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Not in plan

2. Qualification of Personnel Tapping Pipelines under Pressure (detail) *Does the process require taps on a pipeline under pressure (hot taps) to be performed by qualified personnel? (TQ.QU.HOTTAPQUAL.P) (detail)*

192.627 (192.805(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Not in plan

Procedures - Pipeline Purging

1. Pipeline Purging (detail) *Does the process include requirements for purging of pipelines in accordance with 192.629? (MO.GOODOR.PURGE.P) (detail)*

192.605(b)(1) (192.629(a); 192.629(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Sec 117.2

Procedures – Control Room Management

See separate Control Room Management question set.

Procedures - Transmission Lines - Patrolling & Leakage Survey

1. Patrolling Requirements (detail) *Does the process adequately cover the requirements for patrolling the ROW and conditions reported? (PD.RW.PATROL.P) (detail)*

192.705(a) (192.705(b); 192.705(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Leakage Surveys (detail) *Does the process require leakage surveys to be conducted? (PD.RW.LEAKAGE.P) (detail)*

192.706 (192.706(a); 192.706(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Distribution System Patrolling & Leakage Survey

1. Distribution System Leakage Surveys (detail) *Does the process require distribution system patrolling and leakage surveys to be conducted? (PD.RW.DISTLEAKAGE.P) (detail)*

192.721 (192.721(a); 192.721(b); 192.723(a); 192.723(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Ref in plan but not what city is doing
Sec 112

Procedures - Line Marker

1. ROW Markers Requirements (detail) *Does the process adequately cover the requirements for placement of ROW markers? (PD.RW.ROWMARKER.P) (detail)*

192.707(a) (192.707(b); 192.707(c); 192.707(d); CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Sec 111.4

Procedures - Transmission Record Keeping

1. Transmission Lines Record Keeping (detail) *Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test? (MO.GM.RECORDS.P) (detail)*

192.605(b)(1) (192.709(a); 192.709(b); 192.709(c); 192.743(f))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Transmission Field Repair

1. Transmission Lines Permanent Field Repair of Defects (detail) *Is the process adequate for the permanent field repair of defects in transmission lines? (AR.RMP.FIELDREPAIRDEFECT.P) (detail)*

192.605(b)(1) (192.713(a); 192.713(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes
No transmission

2. Transmission Lines Permanent Field Repair of Welds (detail) *Is the process adequate for the permanent field repair of welds? (AR.RMP.FIELDREPAIRWELDS.P) (detail)*

192.605(b) (192.715(a); 192.715(b); 192.715(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

3. Transmission Lines Permanent Field Repair of Leaks (detail) *Is there an adequate process for the permanent field repair of leaks on transmission lines? (AR.RMP.FIELDREPAIRLEAK.P) (detail)*

192.605(b) (192.717(a); 192.717(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

4. Transmission Lines Testing of Repairs (detail) *Is the process adequate for the testing of replacement pipe and repairs made by welding on transmission lines? (AR.RMP.WELDTTEST.P) (detail)*

192.605(b) (197.719(a); 197.719(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Test Requirements For Reinstating Service Lines

1. Test Reinstated Service Lines (detail) *Is the process adequate for the testing of disconnected service lines?*
(AR.RMP.TESTREINSTATE.P) (detail)

192.605(b) (197.725(a); 197.725(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Not stated in plan

Procedures - Abandonment Or Deactivation Of Facilities

1. Abandonment or Deactivation of Pipe and Facilities (detail) *Does the process include procedures for the abandonment and deactivation of pipelines that are in accordance with 192.727?* (MO.GM.ABANDONPIPE.P) (detail)

192.605(b)(1) (192.727(a); 192.727(b); 192.727(c);
192.727(d); 192.727(e); 192.727(f); 192.727(g))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Sec 112.41

Procedures - Pressure Limiting And Regulating Station

1. Pressure Limiting and Regulating Stations Inspection and Testing (detail) *Does the process include procedures for inspecting and testing each pressure limiting station, relief device, and pressure regulating station and their equipment at intervals not exceeding 15 months, but at least once each calendar year as required?* (MO.GMOPP.PRESSREGTEST.P) (detail)

192.605(b)(1) (192.739(a); 192.739(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Sec 113.1

2. Pressure Telemetry or Recording Gauges (detail) *Does the process require telemetry or recording gauges be utilized as required for distribution systems?* (MO.GMOPP.PRESSREGMETER.P) (detail)

192.605(b)(1) (192.741(a); 192.741(b); 192.741(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Sec 116.2

3. Pressure Limiting and Regulating Stations Capacity of Relief Devices (detail) *Does the process include procedures for ensuring, either by testing or a review of calculations, at intervals not exceeding 15 months, but at least once each calendar year, that the capacity of each pressure relief device at pressure limiting stations and pressure regulating stations has sufficient capacity, and for installing a new or additional device if a relief device is determined to have insufficient capacity?* (MO.GMOPP.PRESSREGCAP.P) (detail)

192.605(b)(1) (192.743(a); 192.743(b); 192.743(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Not in plan

Procedures - Valve And Vault Maintenance

1. Valve Maintenance Transmission Lines (detail) *Does the process include procedures for inspecting and partially operating each transmission line valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable?* (MO.GM.VALVEINSPECT.P) (detail)

192.605(b)(1) (192.745(a); 192.745(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Valve Maintenance Distribution Lines (detail) *Does the process include procedures for inspecting and partially operating each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable?* (MO.GM.DISTVALVEINSPECT.P) (detail)

192.605(b)(1) (192.747(a); 192.747(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Sec 114.4

Procedures - Vault Inspection

1. Vault Inspection (detail) *Does the process provide adequate direction for inspecting vaults having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more that house pressure regulating/limiting equipment and are inspections to be performed at the required interval?* (FS.FG.VAULTINSPECTFAC.P) (detail)

192.605(b)(1) (192.749(a); 192.749(b); 192.749(c); 192.749(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Prevention Of Accidental Ignition

192.605(b)(1) (192.751(a); 192.751(b); 192.751(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Not found in plan

Procedures - Caulked Bell And Spigot Joints

1. Bell and Spigot Joints (detail) *Does the process require that caulked bell and spigot joints be correctly sealed?*
(MO.GM.BELLSPIGOTJOINT.P) (detail)

192.753(a) (192.753(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Protecting Cast-Iron Pipeline

1. Protecting Cast-Iron Pipeline (detail) *Does the process require adequate protection for segments of a buried cast-iron pipeline for which support has been disturbed?* (MO.GM.CASTIRONPROTECT.P) (detail)

192.755(a) (192.755(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Procedures - Welding And Weld Defect Repair/Removal

1. Welding Procedures (detail) *Does the process require welding to be performed by qualified welders using qualified welding procedures and are welding procedures and qualifying tests required to be recorded in detail?*
(DC.WELDPROCEDURE.WELD.P) (detail)

192.225(a) (192.225(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

States code only no procedure

Sec 8 requires welders to be tested

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*** 2. Qualification of Welders (detail)** Does the process require welders to be qualified in accordance with API 1104 or the ASME Boiler & Pressure Vessel Code? (TQ.QUOMCONST.WELDER.P) (detail)

192.227(a) (192.225(a); 192.225(b); 192.328(a); 192.328(b))	Sat+	Sat	Concern	Unsat	NA	NC
				x		

Notes
Not in detail states code
required api 1104 or appendix c

3. Qualification of Welders for Low Stress Pipe (detail) Does the process require welders who perform welding on low stress pipe on lines that operate at < 20% SMYS to be qualified under Section I of Appendix C to Part 192, and are welders who perform welding on service line connection to a main required to be qualified under Section II of Appendix C to Part 192? (TQ.QUOMCONST.WELDERLOWSTRESS.P) (detail)

192.227(b) (192.225(a); 192.225(b); 192.805(b))	Sat+	SAT	Concern	Unsat	NA	NC
				x		

Notes
States code

4. Limitations on Welders (detail) Does the process require certain limitations be placed on welders? (DC.WELDERQUAL.WELDERLIMITNDT.P) (detail)

192.303 (192.229(a); 192.229(b); 192.229(c); 192.229(d))	Sat+	Sat	Concern	Unsat	NA	NC
				x		

Notes
Not in plan

5. Welding Weather (detail) Does the process require welding to be protected from weather conditions that would impair the quality of the completed weld? (DC.WELDPROCEDURE.WELDWEATHER.P) (detail)

192.303 (192.231)	Sat+	Sat	Concern	Unsat	NA	NC
				x		

Notes
Not in plan

6. Miter joints (detail) Does the process prohibit the use of certain miter joints? (DC.WELDPROCEDURE.MITERJOINT.P) (detail)

192.303 (192.233(a); 192.233(b); 192.233(c))	Sat+	Sat	Concern	Unsat	NA	NC
				x		

Notes
Not in plan

7. Preparation for Welding (detail) Does the process require certain preparations for welding, in accordance with §192.235? (DC.WELDPROCEDURE.WELDPREP.P) (detail)

192.303 (192.235)	Sat+	Sat	Concern	Unsat	NA	NC
				x		

Notes
Not in plan

8. Inspection and Test of Welds (detail) Does the process require visual inspections of welds to be conducted by qualified inspectors? (DC.WELDINSP.WELDVISUALQUAL.P) (detail)

192.303 (192.241(a); 192.241(b); 192.241(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan

9. Repair or Removal of Weld Defects (detail) Does the process require welds that are unacceptable to be removed and/or repaired as specified by 192.245? (DC.WELDINSP.WELDREPAIR.P) (detail)

192.303 (192.245(a); 192.245(b); 192.245(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan

Procedures - Nondestructive Testing

1. Nondestructive Test and Interpretation Procedures (detail) Is there a process for nondestructive testing and interpretation? (DC.WELDINSP.WELDNDT.P) (detail)

192.243(a) (192.243(b); 192.243(c); 192.243(d); 192.243(e).)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan

Procedures - Joining Of Pipeline Materials

1. Plastic Pipe Joints (detail) Does the process require plastic pipe joints to be designed and installed in accordance with 192.281? (DC.CO.PLASTICJOINT.P) (detail)

192.303 (192.273(b); 192.281(a); 192.281(b); 192.281(c); 192.281(d); 192.281(e))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Operator does not have proper fusion procedures
Not sure what plastic fusion city of drakesboro is using

Sec 9 has butt fusion section

2. Plastic pipe - Qualifying Joining Procedures (detail) Does the process require plastic pipe joining procedures to be qualified in accordance with §192.283, prior to making plastic pipe joints? (DC.CO.PLASTICJOINTPROCEDURE.P) (detail)

192.273(b) (192.283(a); 192.283(b); 192.283(c); 192.283(d))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan

3. Plastic pipe - Qualifying Joining Procedures (detail) *Is a process in place to ensure that personnel making joints in plastic pipelines are qualified?* (DC.CO.PLASTICJOINTQUAL.P) (detail)

192.285(d) (192.285(a); 192.285(b); 192.285(c); 192.805)	Sat+	Sat	Concern	Unsat	NA	NC
				x		

Notes
Not in plan

4. Qualification of Personnel Inspecting Joints in Plastic Pipelines (detail) *Is a process in place to assure that persons who inspect joints in plastic pipes are qualified?* (DC.CO.PLASTICJOINTINSP.P) (detail)

192.287 (192.805(h))	Sat+	Sat	Concern	Unsat	NA	NC
				x		

Notes
Not in plan

Procedures - Corrosion Control

1. Corrosion Control Personnel Qualification (detail) *Does the process require corrosion control procedures to be carried out by, or under the direction of, qualified personnel?* (TQ.QU.CORROSION.P) (detail)

192.453 (192.805(b))	Sat+	Sat	Concern	Unsat	NA	NC
				x		

Notes
Not in plan

2. New Buried Pipe Coating (detail) *Does the process require that each buried or submerged pipeline installed after July 31, 1971, be protected against external corrosion with an adequate coating unless exempted by §192.455(b)?* (TD.COAT.NEWPIPE.P) (detail)

192.605(b)(2) (192.455(a); 192.461; 192.463; 192.483(a))	Sat+	Sat	Concern	Unsat	NA	NC
		x				

Notes
Sec 105.1

3. Conversion to Service - Pipe Coating (detail) *Does the process require that each buried or submerged pipeline that has been converted to gas service and was installed after July 31, 1971, be protected against external corrosion with an adequate coating unless exempted by 192.455(b)?* (TD.COAT.CONVERTPIPE.P) (detail)

192.605(b)(2) (192.452(a); 192.455(a); 192.455(b); 192.461(a))	Sat+	Sat	Concern	Unsat	NA	NC
					x	

Notes

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4. Cathodic Protection post July 1971 (detail) Does the process require that each buried or submerged pipeline installed after July 31, 1971, be protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering? (TD.CP.POST1971.P) (detail)

192.605(b)(2) (192.455(a); 192.457(a); 192.452(a); 192.452(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Sec 105.1

5. Use of Aluminum (detail) Does the process give adequate guidance for the installation of aluminum in a submerged or buried pipeline? (TD.CP.ALUMINUM.P) (detail)

192.605(b)(2) (192.455(e))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

6. Cathodic Protection pre August 1971 (detail) Does the process require that pipelines installed before August 1, 1971 (except for cast and ductile iron lines) which are 1) bare or ineffectively coated transmission lines or 2) bare or coated pipes in compressor, regulator or meter stations must be cathodically protected in areas where active corrosion is found in accordance with Subpart I or Part 192? (TD.CP.PRE1971.P) (detail)

192.605(b)(2) (192.457(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Not in plan

7. Examination of Exposed Portions of Buried Pipe (detail) Does the process require that exposed portions of buried pipeline must be examined for external corrosion? (TD.CPEXPOSED.EXPOSEINSPECT.P) (detail)

192.605(b)(2) (192.459)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Sec 105.6

8. Further Examination of Exposed Portions of Buried Pipe (detail) Does the process require further examination of exposed buried pipe if corrosion is found? (TD.CPEXPOSED.EXPOSECORRODE.P) (detail)

192.605(b)(2) (192.459)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Sec 105.6

9. Cathodic Protection Monitoring Criteria (detail) Does the process require CP monitoring criteria to be used that is acceptable? (TD.CPEXPOSED.MONITORCRITERIA.P) (detail)

192.605(b)(2) (192.463(a); 192.463(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Sec 105.13

10. Cathodic Protection of Amphoteric Metals (detail) *Does the process describe criteria to be used for cathodic protection of amphoteric metals (aluminum) that are included in a steel pipeline? (TD.CP.AMPHOTERIC.P) (detail)*

192.605(b)(2) (192.463(b); 192.463(c))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

11. Cathodic Protection Monitoring (detail) *Does the process adequately describe how to monitor CP that has been applied to pipelines? (TD.CP.MONITOR.TEST.P) (detail)*

192.605(b)(2) (192.465(a))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
Sec 105.2

12. Rectifiers or other Impressed Current Sources (detail) *Does the process give sufficient details for making electrical checks of rectifiers or impressed current sources? (TD.CP.MONITOR.CURRENTTEST.P) (detail)*

192.605(b)(2) (192.465(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
Sec 105.1

13. Bonds, Diodes and Reverse Current Switches (detail) *Does the process give sufficient details for making electrical checks of interference bonds, diodes, and reverse current switches? (TD.CP.MONITOR.REVCURRENTTEST.P) (detail)*

192.605(b)(2) (192.465(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
Sec 105.5

14. Correction of Corrosion Control Deficiencies (detail) *Does the process require that the operator correct any identified deficiencies in corrosion control? (TD.CP.MONITOR.DEFICIENCY.P) (detail)*

192.605(b)(2) (192.465(d))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan

15. Unprotected Buried Pipelines (typically bare pipelines) (detail) *Does the process give sufficient direction for the monitoring of external corrosion on buried pipelines that are not protected by cathodic protection? (TD.CP.UNPROTECT.P) (detail)*

192.605(b)(2) (192.465(e))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

16. Isolation from Other Metallic Structures (detail) *Does the process give adequate guidance for electrically isolating each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit? (TD.CP.ELECSOLATE.P) (detail)*

192.605(b)(2) (192.467(a); 192.467(b); 192.467(c); 192.467(d); 192.467(e))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan

17. Test Leads Installation (detail) *Does the process provide adequate instructions for the installation of test leads? (TD.CP.MONITOR.TESTLEAD.P) (detail)*

192.605(b)(2) (192.471(a); 192.471(b); 192.471(c); 192.469)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan

18. Interference Currents (detail) *Does the process give sufficient guidance and detail for identifying areas of potential stray current so the detrimental effects of stray currents can be minimized through a continuing program? (TD.CP.MONITOR.INTFCURRENT.P) (detail)*

192.605(b)(2) (192.473(a))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan

19. Internal Corrosion (detail) *If the process does not preclude corrosive gas to be transported by pipeline, does the process also require that the corrosive effect of the gas on the pipeline be investigated and steps be taken to minimize internal corrosion? (TD.ICP.CORRGAS.P) (detail)*

192.605(b)(2) (192.475(a))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan

20. Internal Corrosion in Cutout Pipe (detail) *Does the process direct personnel to examine removed pipe for evidence of internal corrosion? (TD.ICP.EXAMINE.P) (detail)*

192.605(b)(2) (192.475(a); 192.475(b))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
Sec 105.9

21. Internal Corrosion Control: Design and Construction (192.476) (detail) *Does the process require that the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of §192.476? (DC.DPC.INTCORRODE.P) (detail)*

192.453 (192.476(a); 192.476(b); 192.476(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

22. Internal Corrosion Corrosive Gas Actions (detail) *Does the process give adequate direction for actions to be taken if corrosive gas is being transported by pipeline? (TD.ICP.CORRGASACTION.P) (detail)*

192.605(b)(2) (192.477)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan

23. Atmospheric Corrosion (detail) *Does the process give adequate guidance for protecting above ground pipe from atmospheric corrosion? (TD.ATM.ATMCORRODE.P) (detail)*

192.605(b)(2) (192.479(a); 192.479(b); 192.479(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
Sec 105.6 a

24. Atmospheric Corrosion Monitoring (detail) *Does the process give adequate instruction for the inspection of aboveground pipeline segments for atmospheric corrosion? (TD.ATM.ATMCORRODEINSP.P) (detail)*

192.605(b)(2) (192.481(a); 192.481(b); 192.481(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan

25. Repair of Corroded Pipe (detail) *Does the process give sufficient guidance for personnel to repair or replace pipe that has corroded to an extent that there is no longer sufficient remaining strength in the pipe wall? (AR.RCOM.REPAIR.P) (detail)*

192.491(c) (192.485(a); 192.485(b); 192.487(a); 192.487(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

26. Evaluation of Internally Corroded Pipe (detail) *Does the process give sufficient guidance for personnel to evaluate the remaining strength of pipe that has been internally corroded? (TD.ICP.EVALUATE.P) (detail)*

192.605(b)(2) (192.485(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan

27. Graphitization of Cast Iron and Ductile Iron (detail) *Does the process give adequate guidance for remediation of graphitization of cast iron or ductile iron pipe? (TD.CP.GRAPHITIZE.P) (detail)*

192.605(b)(2) (192.489(a); 192.489(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

28. Corrosion Control Records (detail) *Does the process include records requirements for the corrosion control activities listed in 192.491? (TD.CP.RECORDS.P) (detail)*

192.605(b)(2) (192.491(a); 192.491(b); 192.491(c))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes Sec 106

Field Review - Pipeline Inspection (Field)

1. Transmission Line Valve Spacing (detail) *Are transmission line valves being installed as required of 192.179? (DC.DPC.VALVESPACE.O) (detail)*

192.141 (192.179(a); 192.179(b); 192.179(c); 192.179(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Cathodic Protection Monitoring Criteria (detail) *Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria? (TD.CP.MONITOR.MONITORCRITERIA.O) (detail)*

192.463(a)

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes No oq operator

3. Rectifier or other Impressed Current Sources (detail) *Are impressed current sources properly maintained and are they functioning properly? (TD.CP.MONITOR.CURRENTTEST.O) (detail)*

192.465(b)

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes No oq operator

4. Internal Corrosion Control: Design and Construction (192.476) (detail) *Does the transmission project's design and construction comply with 192.476? (DC.DPC.INTCORRODE.O) (detail)*

192.476(a) (192.476(b); 192.476(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

5. Atmospheric Corrosion Monitoring (detail) *Is pipe that is exposed to atmospheric corrosion protected? (TD.ATM.ATMCORRODEINSP.O) (detail)*

192.481(b) (192.481(c); 192.479(a); 192.479(b); 192.479(c))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

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6. Normal Operations and Maintenance Procedures - Review (detail) *Are operator personnel knowledgeable of the procedures used in normal operations?* (MO.GO.OMEFFECTREVIEW.O) (detail)

192.605(b)(8)

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

7. Placement of ROW Markers (detail) *Are line markers placed and maintained as required?*

(PD.RW.ROWMARKER.O) (detail)

192.707(a) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Pipeline markers info on markers are unable to read need to be replaced

8. Placement of ROW Markers (detail) *Are line markers placed and maintained as required for above ground pipelines?* (PD.RW.ROWMARKERABOVE.O) (detail)

192.707(c) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

9. Transmission Lines Testing of Repairs (detail) *Does the operator properly test replacement pipe and repairs made by welding on transmission lines?* (AR.RMP.WELDTTEST.O) (detail)

192.719(a) (192.719(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

10. Pressure Telemetry or Recording Gauges (detail) *Are telemetry or recording gauges properly utilized as required for distribution systems?* (MO.GMOPP.PRESSREGMETER.O) (detail)

192.741(a) (192.741(b); 192.741(c))

Sat+	Sat	Concern	Unsat	NA	NC

Notes

No recording gauges were observed in field

11. Pressure Limiting and Regulating Stations Inspection and Testing (detail) *Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?* (MO.GMOPP.PRESSREGTEST.O) (detail)

192.739(a) (192.739(b); 192.743)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Regulators were completely covered in ice. Drakesboro purchase station needs to inspected immediately

12. Valve Maintenance Transmission Lines (detail) *Are field inspection and partial operation of transmission line valves adequate?* (MO.GM.VALVEINSPECT.O) (detail)

192.745(a) (192.745(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

13. Prevention of Accidental Ignition (detail) *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.* (AR.RMP.IGNITION.O) (detail)

192.751(a) (192.751(b); 192.751(c))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

Records - Regulatory Reporting Performance

1. Immediate Reporting: Incidents (detail) *Do records indicate immediate notifications of incidents were made in accordance with 191.5?* (RPT.RR.IMMEDREPORT.R) (detail)

191.5(a) (191.7(a))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes
No incidents

2. Incident Reports (detail) *Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.2 (01-2002) within the required timeframe?* (RPT.RR.INCIDENTREPORT.R) (detail)

191.15(a)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes
No incidents

3. Supplemental Incident Reports (detail) *Do records indicate accurate supplemental incident reports were filed and within the required timeframe?* (RPT.RR.INCIDENTREPORTSUPP.R) (detail)

191.15(c)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes
No incidents

4. Annual Report Records (detail) *Have complete and accurate Annual Reports been submitted?* (RPT.RR.ANNUALREPORT.R) (detail)

191.17(a)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No annual report has ever been submitted as required to the phmsa portal

The 2017 report was hand written which is not accepted

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5. Safety Related Condition Reports (detail) *Do records indicate safety-related condition reports were filed as required? (RPT.RR.SRCR.R) (detail)*

191.23(a) (191.25(a); 191.25(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes
No SRC

6. Customer Notification (detail) *Do records indicate the customer notification process satisfies the requirements of 192.16? (MO.GO.CUSTNOTIFY.R) (detail)*

192.16(d) (192.16(a); 192.16(b); 192.16(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No record could be produced that notification was sent to customers as required.

7. NPMS: Abandoned Underwater Facility Reports (detail) *Do records indicate reports were filed for abandoned offshore pipeline facilities or abandoned onshore pipeline facilities that crosses over, under or through a commercially navigable waterway? (RPT.RR.NPMSABANDONWATER.R) (detail)*

192.727(g)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Records - Construction Performance

1. Welding Procedures (detail) *Do records indicate weld procedures are being qualified in accordance with 192.225? (DC.WELDPROCEDURE.WELD.R) (detail)*

192.225(a) (192.225(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes
No records

2. Qualification of Welders (detail) *Do records indicate adequate qualification of welders? (TQ.QUOMCONST.WELDER.R) (detail)*

192.227(a) (192.227(b); 192.229(a); 192.229(b); 192.229(c); 192.229(d); 192.328(a); 192.328(b); 192.807(a); 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes
No records

3. Inspection and Test of Welds (detail) Do records indicate that individuals who perform visual inspection of welding are qualified by appropriate training and experience, as required by §192.241(a)? (DC.WELDINSP.WELDVISUALQUAL.R) (detail)

192.241(a) (192.241(b); 192.241(c); 192.807(a); 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes
No records to review

4. Qualification of Nondestructive Testing Personnel (detail) Do records indicate the qualification of nondestructive testing personnel? (TQ.QUOMCONST.NDT.R) (detail)

192.243(b)(2) (192.807(a); 192.807(b); 192.328(a); 192.328(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes
No records to review

5. Nondestructive Test and Interpretation Procedures (detail) Do records indicate that NDT implementation is adequate? (DC.WELDINSP.WELDNDT.R) (detail)

192.243(a) (192.243(b)(1); 192.243(b)(2); 192.243(c); 192.243(a))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes
No records to review

6. Transmission Lines Record Keeping (detail) Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test? (MO.GM.RECORDS.R) (detail)

192.605(b)(1) (192.243(f); 192.709(a); 192.709(b); 192.709(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

7. Plastic pipe - Qualifying Joining Procedures (detail) Have plastic pipe joining procedures been qualified in accordance with 192.283? (DC.CO.PLASTICJOINTPROCEDURE.R) (detail)

192.273(b) (192.283(a); 192.283(b); 192.283(c); 192.283(d))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
At this time no employee is qualified to conduct plastic pipe fusion no records could be produced

8. Plastic pipe - Qualifying Joining Procedures (detail) Do records indicate persons making joints in plastic pipelines are qualified in accordance with 192.285? (DC.CO.PLASTICJOINTQUAL.R) (detail)

192.285(d) (192.285(a); 192.285(b); 192.285(c); 192.807(a); 192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
At this time no employee is qualified to conduct plastic pipe fusion no records could be produced

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9. Qualification of Personnel Inspecting Joints in Plastic Pipelines (detail) Do records indicate persons inspecting the making of plastic pipe joints have been qualified? (DC.CO.PLASTICJOINTINSP.R) (detail)

192.287 (192.807(a); 192.807(b))	Sat+	Sat	Concern	Unsat	NA	NC

Notes

10. Underground Clearance (detail) Do records indicate pipe is installed with clearances in accordance with 192.325, and (if plastic) installed as to prevent heat damage to the pipe? (DC.CO.CLEAR.R) (detail)

192.325(a) (192.325(b); 192.325(c))	Sat+	Sat	Concern	Unsat	NA	NC
						x

Notes
No records to review

11. Depth of Cover - Onshore (detail) Is onshore piping minimum cover as specified in 192.327? (DC.CO.COVER.R) (detail)

192.327(a) (192.327(b); 192.327(c), 192.327(d); 192.327(e))	Sat+	Sat	Concern	Unsat	NA	NC
						x

Notes
No records to review

12. EFV Installation (detail) Do records indicate the EFV program satisfies the requirements for installation and performance? (MO.GO.EFVINSTALL.R) (detail)

192.383(b) (192.381(a); 192.381(b); 192.381(c); 192.381(d); 192.381(e); 192.383(a); 192.383(c))	Sat+	Sat	Concern	Unsat	NA	NC
			x			

Notes
No new service orders records to be inspected
But contractor stated drakesboro employees were not putting excess flow valves on new services.
But no records to review

13. Cathodic Protection post July 1971 (detail) Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering? (TD.CP.POST1971.R) (detail)

192.491(c) (192.455(a); 192.457(a); 192.452(a); 192.452(b))	Sat+	Sat	Concern	Unsat	NA	NC
						x

Notes
No records provided

Records - Operations And Maintenance Performance

1. Strength Test Requirements for SMYS > 30%. (detail) *Is pressure testing conducted in accordance with 192.505? (DC.PT.PRESSTESTHIGHSTRESS.R) (detail)*

192.517(a) (192.505(a); 192.505(b); 192.505(c); 192.505(d); 192.505(e))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Strength Test Duration Requirements for SMYS < 30% (detail) *Do records indicate that pressure testing is conducted in accordance with 192.507? (DC.PTLOWPRESS.PRESSTESTLOWSTRESS.R) (detail)*

192.517(a) (192.507(a); 192.507(b); 192.507(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

3. Strength Test Requirements for Operations < 100 psig (detail) *Do records indicate that pressure testing is conducted in accordance with 192.509(a)? (DC.PTLOWPRESS.PRESSTEST100PSIG.R) (detail)*

192.517(a) (192.509(a); 192.509(b))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

no records could be produced to show pressure tests

4. Test Requirements for Plastic Pipe (detail) *Do records indicate that pressure testing is conducted in accordance with 192.513? (DC.PT.PRESSTESTPLASTIC.R) (detail)*

192.517(a) (192.513(a); 192.513(b); 192.513(c); 192.513(d))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

no records could be produced to show pressure tests

5. Normal Maintenance and Operations (detail) *Has the operator conducted annual reviews of the written procedures in the manual as required? (MO.GO.OMANNUALREVIEW.R) (detail)*

192.605(a)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No annual review of written procedures has been conducted

6. Normal Operations and Maintenance Procedures - History (detail) *Are construction records, maps and operating history available to appropriate operating personnel? (MO.GO.OMHISTORY.R) (detail)*

192.605(a) (192.605(b)(3))

Sat+	Sat	Concern	Unsat	NA	NC
		x			

Notes

There are little or no construction records, and very little detail of operating history also the map is not been updated

A new map of system needs to be completed

7. Normal Operations and Maintenance Procedures - Review (detail) Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operations and maintenance and modifying the procedures when deficiencies are found? (MO.GO.OMEFFECTREVIEW.R) (detail)

192.605(a) (192.605(b)(8))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No record could be produced to meet this requirement

8. Abnormal Operations (Review) (detail) Do records indicate periodic review of work done by operator personnel to determine the effectiveness of the abnormal operation procedures and corrective action taken where deficiencies are found? (MO.GO.ABNORMAL.ABNORMALREVIEW.R) (detail)

192.605(a) (192.605(c)(4))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No record could be produced to meet this requirement

9. Damage Prevention Program (detail) Does the damage prevention program meet minimum requirements specified in 192.614(c)? (PD.OC.PDPROGRAM.R) (detail)

192.614(c)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

The operator does not have a written damage prevention plan that meets the requirements.

No record provided proves the 811 requirement was sent to customers as required by commission

10. Change in Class Location Required Study (detail) Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location? (MO.GO.CLASS.CLASSLOCATESTUDY.R) (detail)

192.605(b)(1) (192.609(a); 192.609(b); 192.609(c);
192.609(d); 192.609(e); 192.609(f))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

11. Emergency Response Performance (detail) Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency? (EP.ERG.POSTEVTREVIEW.R) (detail)

192.605(a) (192.615(b)(1); 192.615(b)(3))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No record could be produced to meet this requirement

12. Emergency Response Training (detail) Has the operator trained the appropriate operating personnel on emergency procedures and verified that the training was effective in accordance with its procedures? (EP.ERG.TRAINING.R) (detail)

192.605(a) (192.615(b)(2))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No record could be produced to meet this requirement

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13. Liaison with Public Officials (detail) Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures? (EP.ERG.LIAISON.R) (detail)

192.605(a) (192.615(c)(1); 192.615(c)(2); 192.615(c)(3); 192.615(c)(4); ADB-05-03)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No record could be produced to meet this requirement

14. Incident Investigation (detail) Do records indicate actions initiated to analyze accidents and failures, including the collection of appropriate samples for laboratory examination to determine the causes of the failure and minimize the possibility of recurrence, in accordance with its procedures? (EP.ERG.INCIDENTANALYSIS.R) (detail)

192.605(a) (192.617)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

No incidents at this time

15. General - Testing Requirements (detail) Do records indicate that pressure testing is conducted in accordance with 192.503? (DC.PT.PRESSTEST.R) (detail)

192.503(a) (192.503(b); 192.503(c); 192.503(d))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

No records were provided for review

16. Audience Identification Records (detail) Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages? (PD.PA.AUDIENCEID.R) (detail)

192.616(d) (192.616(e); 192.616(f); API RP 1162 Section 2.2; API RP 1162 Section 3)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No record could be produced to meet this requirement

17. Educational Provisions (detail) Did delivered messages specifically include provisions to educate the public, emergency officials, local public officials, and excavators on: (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with unintended releases from a gas pipeline facility; (3) Physical indications of a possible release; (4) Steps to be taken for public safety in the event of a gas pipeline release; and (5) Procedures to report such an event? (PD.PA.EDUCATE.R) (detail)

192.616(d) (192.616(f))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No record could be produced to meet this requirement

PHMSA Form 2 Question Set (IA Equivalent)
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18. Maximum Allowable Operating pressure (detail) Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required? (MO.GOMAOP.MAOPDETERMINE.R) (detail)

192.709 (192.619; 192.621; 192.623)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

A record from November 18, 1987 was reviewed reviewing maop determination

19. Messages on Pipeline Facility Locations (detail) Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations? (PD.PA.LOCATIONMESSAGE.R) (detail)

192.616(e) (192.616(f))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No record could be produced to meet this requirement

20. Odorization of Gas (detail) Do records indicate appropriate odorization of its combustible gases in accordance with its procedures and conduct of the required testing to verify odorant levels met requirements? (MO.GOODOR.ODORIZE.R) (detail)

192.709(c) (192.625(a); 192.625(b); 192.625(c); 192.625(d); 192.625(e); 192.625(f))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

The last odor test inspection record to review was

November 2017 but now one signed off whom did reading

The last reading was 11-2017

Dukes: 0.63

Johnsons: 0.67

D. Jones 0.70

Depoyster .64

B. Churcht 0.64

Jan -Nov. 2017 records reviewed by Robert Lyndsey

There were no 2018 records to review

21. Baseline Message Delivery Frequency (detail) Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3? (PD.PA.MESSAGEFREQUENCY.R) (detail)

192.616(c) (API RP 1162 Table 2-1; API RP 1162 Table 2-2; API RP 1162 Table 2-3)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No record could be produced to meet this requirement

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STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

22. Patrolling Requirements (detail) *Do records indicate that ROW surface conditions have been patrolled as required? (PD.RW.PATROL.R) (detail)*

192.709(c) (192.705(a); 192.705(b); 192.705(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

The last patrolling record 10-24-25-2017 by Robert Lyndsey

The patrolling was not conducted in 2018 .

23. Liaison with Emergency and Other Public Officials (detail) *Have liaisons been established and maintained with appropriate fire, police, and other public officials? (PD.PA.LIAISON.R) (detail)*

192.616(c) (API RP 1162 Section 4.4)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No record could be produced to meet this requirement

24. Leakage Surveys (detail) *Do records indicate leakage surveys conducted as required? (PD.RW.LEAKAGE.R) (detail)*

192.709(c) (192.706; 192.706(a); 192.706(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

25. Other Languages (detail) *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas? (PD.PA.LANGUAGE.R) (detail)*

192.616(g) (API RP 1162 Section 2.3.1)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No public awareness plan

26. Distribution Leakage Surveys (detail) *Do records indicate distribution leakage surveys were conducted as required? (PD.RW.DISTLEAKAGE.R) (detail)*

192.603(b) (192.721(a); 192.721(b); 192.723(a); 192.723(b))

Sat+	Sat	Concern	Unsat	NA	NC

Notes

12/4-12/2017 leak survey record

Record states Survey conducted by Jordon Shaw and Witness Blake Biscomb

All business conducted and section 5 of survey

Only 1 Class 3 leak

Leak repair on 2-17-2016 2 inch pe leak on main in gravel plastic line clamped Robert Lyndsey and Eddie Brake

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

27. Test Reinstated Service Lines (detail) *From the review of records, did the operator properly test disconnected service lines? (AR.RMP.TESTREINSTATE.R) (detail)*

192.603(b) (192.725(a), 192.725(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

No leak repair records were produced for inspection to review 2016

28. Evaluate Program Implementation (detail) *Has an audit or review of the operator's program implementation been performed annually since the program was developed? (PD.PA.EVALIMPL.R) (detail)*

192.616(c) (192.616(i); API RP 1162 Section 8.3)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No public awareness plan

29. Acceptable Methods for Program Implementation Audits (detail) *Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of program implementation? (PD.PA.AUDITMETHODS.R) (detail)*

192.616(c) (192.616(i); API RP 1162 Section 8.3)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

In public awareness plan to review

30. Abandonment or Deactivation of Pipeline and Facilities (detail) *Do records indicate pipelines were abandoned or deactivated as required? (MO.GM.ABANDONPIPE.R) (detail)*

192.709(c) (192.727(a); 192.727(b); 192.727(c); 192.727(d); 192.727(e); 192.727(f); 192.727(g))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

No records were provided to review

31. Program Changes and Improvements (detail) *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)? (PD.PA.PROGRAMIMPROVE.R) (detail)*

192.616(c) (API RP 1162 Section 8.3)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No public awareness plan to review

32. Pressure Limiting and Regulating Stations Inspection and Testing (detail) *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations as required and at the specified intervals? (MO.GMOPP.PRESSREGTEST.R) (detail)*

192.709(c) (192.739(a); 192.739(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No regulator inspection records were produced to review

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33. Evaluating Program Effectiveness (detail) *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program? (PD.PA.EVALEFFECTIVENESS.R) (detail)*

192.616(c) (API RP 1162 Section 8.4)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No public awareness plan

34. Pressure Limiting and Regulating Stations Capacity of Relief Devices (detail) *Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required and a new or additional device installed if determined to have insufficient capacity? (MO.GMOPP.PRESSREGCAP.R) (detail)*

192.709(c) (192.743(a); 192.743(b); 192.743(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No record was provided to meet this requirement

35. Measure Program Outreach (detail) *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked? (PD.PA.MEASUREOUTREACH.R) (detail)*

192.616(c) (API RP 1162 Section 8.4.1)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No public awareness plan was found for inspection

36. Valve Maintenance Transmission Lines (detail) *Do records indicate proper inspection and partial operation of transmission line valves that may be required during an emergency as required and prompt remedial actions taken if necessary? (MO.GM.VALVEINSPECT.R) (detail)*

192.709(c) (192.745(a); 192.745(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

37. Measure Understandability of Message Content (detail) *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined? (PD.PA.MEASUREUNDERSTANDABILITY.R) (detail)*

192.616(c) (API RP 1162 Section 8.4.2)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No public awareness plan was found for inspection

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

38. Valve Maintenance Distribution Lines (detail) Do records indicate proper inspection and partial operation of each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year, and prompt remedial action to correct any valve found inoperable? (MO.GM.DISTVALVEINSPECT.R) (detail)

192.603(b) (192.747)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Grease log/ last greased log 11-14-2016 Robert Lyndsey

Not sure this is critical valves it refers to reg station

39. Vault Inspection (detail) Do records document inspections at the required interval of all vaults having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more that house pressure regulating/limiting equipment? (FS.FG.VAULTINSPECTFAC.R) (detail)

192.709(c) (192.749(a); 192.749(b); 192.749(c); 192.749(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

40. Measure Desired Stakeholder Behavior (detail) In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited? (PD.PA.MEASUREBEHAVIOR.R) (detail)

192.616(c) (API RP 1162 Section 8.4.3)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No public awareness plan was found for inspection

41. Prevention of Accidental Ignition (detail) Do records indicate personnel followed procedures for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion? (MO.GM.IGNITION.R) (detail)

192.709 (192.751(a); 192.751(b); 192.751(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

No issues indicated on paper work that resulted in fire or explosion

42. Measure Bottom-Line Results (detail) Were bottom-line results of the program measured by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures? (PD.PA.MEASUREBOTTOM.R) (detail)

192.616(c) (API RP 1162 Section 8.4.4)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No public awareness plan was found for inspection

43. Bell and Spigot Joints (detail) Do records indicate that caulked bell and spigot joints were correctly sealed? (MO.GM.BELLSPIGOTJOINT.R) (detail)

192.603(b) (192.753(a); 192.753(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

44. Program Changes (detail) *Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations? (PD.PA.CHANGES.R) (detail)*

192.616(c) (API RP 1162 Section 2.7 (Step 12); API RP 1162 Section 8.5)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No public awareness plan was found for inspection

45. Master Meter and Petroleum Gas Systems (detail) *Do records indicate the master meter or petroleum gas system operator has met the requirements of 192.616(j)? (PD.PA.MSTRMETER.R) (detail)*

192.616(j) (192.616(h); API RP 1162 Section 2.7 (Step 12); API RP 1162 Section 8.5)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Records - Operator Qualification

1. Qualification Records for Personnel Performing Covered Tasks (detail) *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified? (TQ.OQ.RECORDS.R) (detail)*

192.807(b)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

At the time of the inspection the city of drakesboro does not have an employee oq qualified per cfr part 192.

2. Contractor and Other Entity Qualification (detail) *Are adequate records maintained for contractor personnel qualifications that contain the required elements? (TQ.OQ.OQCONTRACTOR.R) (detail)*

192.807(a) (192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

Not checked at this inspection

Records - Corrosion Control Performance

1. Corrosion Control Records (detail) *Do records indicate the location of all items listed in 192.491(a)? (TD.CP.RECORDS.R) (detail)*

192.491(a)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

No detail of records states what is in system

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2. Examination of Exposed Portions of Buried Pipe (detail) Do records adequately document that exposed buried piping was examined for corrosion? (TD.CPEXPOSED.EXPOSEINSPECT.R) (detail)

192.491(c) (192.459)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

No reports were produced for review

3. Cathodic Protection Monitoring (detail) Do records adequately document cathodic protection monitoring tests have occurred as required? (TD.CPMONITOR.TEST.R) (detail)

192.491(c) (192.465(a))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

The last review of cp was 9-27-2017 by Robert Lindsey

No 2018 records were produced

4. Rectifier or other Impressed Current Sources (detail) Do records document details of electrical checks of sources of rectifiers or other impressed current sources? (TD.CPMONITOR.CURRENTTEST.R) (detail)

192.491(c) (192.465(b))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

The last review of rectifier was 9-27-2017 and 2-21-2018 no name on record who performed inspection.

5. Bonds, Diodes and Reverse Current Switches (detail) Do records document details of electrical checks interference bonds, diodes, and reverse current switches? (TD.CPMONITOR.REVCURRENTTEST.R) (detail)

192.491(c) (192.465(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

No issues indicated on record

6. Correction of Corrosion Control Deficiencies (detail) Do records adequately document actions taken to correct any identified deficiencies in corrosion control? (TD.CPMONITOR.DEFICIENCY.R) (detail)

192.491(c) (192.465(d))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

No records reviewed of correction

7. Unprotected Buried Pipelines (typically bare pipelines) (detail) Do records adequately document the re-evaluation of buried pipelines with no cathodic protection for areas of active corrosion? (TD.CP.UNPROTECT.R) (detail)

192.491(c) (192.465(e))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

Do not know condition of pipe

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

8. Isolation from Other Metallic Structures (detail) Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit? (TD.CP.ELECSOLATE.R) (detail)

192.491(c) (192.467(a); 192.467(b); 192.467(c); 192.467(d); 192.467(e))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

Do not know condition of pipe

9. Test Leads Installation (detail) Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I? (TD.CPMONITOR.TESTLEAD.R) (detail)

192.491(c) (192.471(a); 192.471(b); 192.471(c); 192.469)

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

No records produced at the time of inspection for review

10. Interference Currents (detail) Do records document that the operator has minimized the detrimental effects of stray currents when found? (TD.CPMONITOR.INTFRCURRENT.R) (detail)

192.491(c) (192.473(a))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

Do not know condition of pipe

11. Internal Corrosion (detail) Do records document if corrosive gas is being transported by pipeline, including the investigation of the corrosive effect of the gas on the pipeline and steps that have been taken to minimize internal corrosion? (TD.ICP.CORRGAS.R) (detail)

192.491(c) (192.475(a))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

Do not know condition of pipe

12. Internal Corrosion in Cutout Pipe (detail) Do records document examination of removed pipe for evidence of internal corrosion? (TD.ICP.EXAMINE.R) (detail)

192.491(c) (192.475(a); 192.475(b))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

Do not know condition of pipe

13. Internal Corrosion Control: Design and Construction (192.476) (detail) Do records demonstrate the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476? (DC.DPC.INTCORRODE.R) (detail)

192.476(a) (192.476(b); 192.476(c); .476(d))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

Do not know condition of pipe

PHMSA Form 2 Question Set (IA Equivalent)
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14. Internal Corrosion Corrosive Gas Actions (detail) Do records document the actions taken when corrosive gas is being transported by pipeline? (TD.ICP.CORRGASACTION.R) (detail)

192.491(c) (192.477)

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

Do not know condition of pipe

15. Atmospheric Corrosion Monitoring (detail) Do records document inspection of aboveground pipe for atmospheric corrosion? (TD.ATM.ATMCORRODEINSP.R) (detail)

192.491(c) (192.481(a); 192.481(b); 192.481(c))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

5-2-2017 atmospheric checked on reg station by Robert Lindsey

No records could be produced on meter settings and piping

16. New Buried Pipe Coating (detail) Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with an adequate coating unless exempted under 192.455(b)? (TD.COAT.NEWPIPE.R) (detail)

192.491(c) (192.455(a)(1); 192.461(a); 192.461(b); 192.483(a))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

Do not know condition of pipe

No records to indicated issues

17. Repair of Internally Corroded Pipe (detail) Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall? (TD.ICP.REPAIR.R) (detail)

192.485(a) (192.485(b))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

Do not know condition of pipe

No records to indicated issues

18. Evaluation of Internally Corroded Pipe (detail) Do records document adequate evaluation of internally corroded pipe? (TD.ICP.EVALUATE.R) (detail)

192.491(c) (192.485(c))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

Do not know condition of pipe

No records to indicated issues

Procedures (Distribution Compressor Station) - Compressor Station

1. Compressor Station Design/Construction - Maintenance (detail) *Does the process have sufficient detail for maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service? (FS.CS.CMPMAINT.P) (detail)*

192.605(b)(6)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Compressor Station Design/Construction - Start-Up and Shut-Down (detail) *Does the process for start-up and shut-down have sufficient detail to ensure start-up and shut-down of compressor units in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices? (FS.CS.CMPSUSD.P) (detail)*

192.605(b)(5) (192.605(b)(7))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

3. Compressor Station Design/Construction - Pressure Relief (detail) *Does the process provide adequate detail for inspection and testing of compressor station pressure relief devices with the exception of rupture disks? (FS.CSSYSROT.CMPRELIEF.P) (detail)*

192.605(b)(1) (192.731(a); 192.731(b); 192.731(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

4. Compressor stations - Storage of Combustible Materials (detail) *Does the process include requirements for the storage of flammable/combustible materials and specify that aboveground oil or gasoline storage tanks being installed at compressor stations be protected in accordance with NFPA No. 30, as required of §192.735(b)? (DC.COCMP.CMPCOMBUSTIBLE.P) (detail)*

192.303 (192.735(a); 192.735(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

5. Compressor Station Design/Construction - Permanent Gas Detection (detail) *Does the process adequately detail requirements of permanent gas detectors and alarms at compressor buildings? (FS.CSSYSROT.CMPGASDETREQ.P) (detail)*

192.605(b) (192.736(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Field Review (Distribution Compressor Station) - Compressor Stations Inspection (Field)

1. Compressor Station Design/Construction - Exits (detail) *Does each main compressor building operating floor have at least two separated, easily accessed and unobstructed exits to a place of safety, main compressor building exits that have door latches that can be readily opened without a key, and main compressor building exit doors mounted to swing outward?* (FS.CS.BLDGEXITS.O) (detail)

192.163(c)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Compressor Station Design/Construction - Fence Gates (detail) *Do fenced areas around compressor stations have at least two gates that provide for easy escape to place of safety, and do gates located within 200 feet of any compressor plant open outward and able to be opened from the inside without a key when the station is occupied?* (FS.CS.FENCEGATES.O) (detail)

192.163(d)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

3. Compressor Station Design/Construction - NFPA 70 (detail) *Are the proper permits and approvals authorized under NFPA 70 posted or otherwise located at the compressor station?* (FS.CS.CMPNFPA70.O) (detail)

192.163(e)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

4. Compressor stations Liquid Removal (detail) *Are compressors protected from liquids and, as applicable, liquid separators for compressors installed, in accordance with 192.165? (DC.DPCCMP.CMPLIQPROT.O) (detail)*

192.141 (192.165(a); 192.615(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

5. Compressor Station Design/Construction - ESD Gas Discharge (detail) *Does each compressor station have an emergency shutdown system that is capable of safely discharging blowdown gas from the blowdown piping at a location where the gas will not create a hazard?* (FS.CSSYSPROT.ESDGASDISCH.O) (detail)

192.167(a)(2)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

6. Compressor Station Design/Construction - ESD Gas Block (detail) Does each compressor station have an emergency shutdown system that is capable of blocking gas out of the station and blow down the station piping? NOTE: Not required for field compressor stations of 1,000 horsepower (746 kilowatts) or less. (FS.CSSYSROT.ESDGASBLK.O) (detail)

192.167(a)(1)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

7. Compressor Station Design/Construction - ESD (detail) Does each compressor station have an emergency shutdown system that is capable of shutting down gas compressing equipment and gas fires in the vicinity of gas headers and compressor buildings? (FS.CSSYSROT.ESDGASSD.O) (detail)

192.167(a)(3)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

8. Compressor Station Design/Construction - ESD Electrical (detail) Does each compressor station have an emergency shutdown system that is capable of shutting down electrical facilities (except emergency and equipment protection circuits) near gas headers and within compressor buildings? (FS.CSSYSROT.ESDELECSO.O) (detail)

192.167(a)(3)(i) (192.167(a)(3)(ii))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

9. Compressor Station Design/Construction - ESD Locations (detail) Does each compressor station have an emergency shutdown system that is capable of being operated from at least two locations which are: 1) Outside the gas area of the station, 2) Near the exit gates, if the station is fenced, or near emergency exits, if not fenced, 3) And not more than 500 feet (153 meters) from the limits of the station? (FS.CSSYSROT.ESDLOCATION.O) (detail)

192.167(a)(4)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

10. Compressor Station Design/Construction - Distribution Supply ESD (detail) Does each compressor station that supplies gas directly to a distribution system (with no other adequate sources of gas available) have an emergency shutdown system that will not function at the wrong time or cause unintended outages? (FS.CSSYSROT.ESDDISTSD.O) (detail)

192.167(b)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
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11. Compressor Station Design/Construction - Unattended Platform ESD (detail) *Does each unattended platform compressor station located offshore or in inland navigable waters have an emergency shutdown system that will actuate automatically in the event of the following occurrences? 1) When gas pressure equals the MAOP plus 15 percent and, 2) When an uncontrolled fire occurs on the platform. (FS.CSSYSROT.UNATTPLATCMPSD.O) (detail)*

192.167(c)(1)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

12. Compressor Station Design/Construction - Fire Protection (detail) *Do compressor stations have adequate fire protection facilities? (FS.CSSYSROT.CMPFP.O) (detail)*

192.171(a)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

13. Compressor Station Design/Construction - Over-Speed Protection (detail) *Do compressor stations' prime movers other than electrical induction or synchronous motors have automatic shutdown devices that will prevent over-speed of the prime mover or the unit being driven? (FS.CSSYSROT.CMPOVSPD.O) (detail)*

192.171(b)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

14. Compressor Station Design/Construction - Lubrication (detail) *Do compressor units have shutdown or alarm devices that will operate in the event of inadequate heating or lubrication? (FS.CSSYSROT.CMPLUBROT.O) (detail)*

192.171(c)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

15. Compressor Station Design/Construction - Gas Engine Shutdown (detail) *Are compressor station gas engines that operate with pressure gas injection equipped so that stoppage of the engine will result in the fuel being automatically shut off and the engine distribution manifold being vented? (FS.CSSYSROT.CMPGASENGSD.O) (detail)*

192.171(d)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

16. Compressor Station Design/Construction - Gas Engine Mufflers (detail) *Are gas engines in compressor stations equipped with mufflers that prevent gas from being trapped in the muffler? (FS.CSSYSROT.CMPGASENGMFL.O) (detail)*

192.171(e)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
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17. Compressor Station Design/Construction - Ventilation (detail) *Are compressor station buildings ventilated to ensure employees are not endangered by accumulation of gas in enclosed areas? (FS.CS.CMPBLDGVENT.O) (detail)*

192.173

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

18. Cathodic Protection of Underground Piping (detail) *Are bare or coated pipes in compressor, regulator or meter stations installed before August 1, 1971 (except for cast and ductile iron lines) cathodically protected in areas where active corrosion was found in accordance with Subpart I or Part 192? (TD.CP.PRE1971.O) (detail)*

192.457(b)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

19. Atmospheric Corrosion Monitoring (detail) *Is pipe that is exposed to atmospheric corrosion protected? (TD.ATM.ATMCORRODEINSP.O) (detail)*

192.481(b) (192.481(c); 192.479(a); 192.479(b); 192.479(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

20. Start-Stop Procedures (detail) *During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded? (DC.MO.MAOPLIMIT.O) (detail)*

192.605(b)(5)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

21. Normal Operations and Maintenance Procedures - History (detail) *Are construction records, maps and operating history available to appropriate operating personnel? (MO.GO.OMHISTORY.O) (detail)*

192.605(b)(3)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

22. Compressor Station - Emergency Response Plan (detail) *Are emergency response plans for selected compressor stations kept on site? (FS.CS.CMPERP.O) (detail)*

192.605(a) (192.615(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

PHMSA Form 2 Question Set (IA Equivalent)
STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR

23. MAOP Recording (detail) *Do pressure recording charts or SCADA records indicate that maximum allowable operating pressure limits have been maintained in accordance with 192.619? (MO.GOMAOP.MAOPRECORDING.O) (detail)*

192.605(b)(1) (192.619(a); 192.619(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

24. Placement of ROW Markers (detail) *Are line markers placed and maintained as required? (PD.RW.ROWMARKER.O) (detail)*

192.707(a) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

25. Placement of ROW Markers (detail) *Are line markers placed and maintained as required for above ground pipelines? (PD.RW.ROWMARKERABOVE.O) (detail)*

192.707(c) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

26. Compressor Station Design/Construction - Pressure Relief (detail) *Are pressure relief/limiting devices inside a compressor station designed, installed, and inspected properly? (FS.CSSYSROT.CMPRELIEF.O) (detail)*

192.199 (192.731(a); 192.731(b); 192.731(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

27. Compressor stations - Storage of Combustible Materials (detail) *Are flammable/combustible materials stored as required and aboveground oil or gasoline storage tanks installed at compressor stations protected in accordance with NFPA No. 30, as required by 192.735(b)? (DC.COCOMP.CMPCOMBUSTIBLE.O) (detail)*

192.735(a) (192.735(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

28. Compressor Station Gas Detection (detail) *Have adequate gas detection and alarm systems been installed in selected applicable compressor buildings? (FS.CSSYSROT.CMPGASDET.O) (detail)*

192.736(a) (192.736(b))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Records (Distribution Compressor Station) - Compressor Station O&M Performance

1. Compressor Station Design/Construction - Pressure Relief (detail) *Do records document with adequate detail that all inspection and testing of compressor station pressure relief devices with the exception of rupture disks have occurred at the required interval? (FS.CSSYSROT.CMPRELIEF.R) (detail)*

192.709(b) (192.709(c); 192.731(a); 192.731(b); 192.731(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

2. Compressor Station Design/Construction - Gas Detection (detail) *Do records document that all compressor station gas detection and alarm systems are being maintained and tested as required? (FS.CSSYSROT.CMPGASDETOM.R) (detail)*

192.709(c) (192.736(c))

Sat+	Sat	Concern	Unsat	NA	NC
				x	

Notes

Instructions

1. Use in conjunction with Unit inspections
2. Interview the primary operator contact for the Unit inspection you are conducting and enter their responses. Do not request the operator substance abuse expert to provide responses to these questions.
3. Send completed form to stanley.kastanas@dot.gov

Name of Operator	City of Drakesboro	Op ID #	Unknown
Inspector	Melissa Holbrook	Unit #	
Date of Inspection	2-19-2019		
Inspection Location City & State	Drakesboro, KY		
Operator Employee Interviewed	None	Phone #	
Position/Title			
Operator Designated Employer Representative (DER), (a.k.a. Substance Abuse Program Manager)	Unknown		
DER Phone #			

§199	Pipeline Safety Regulations Drug and Alcohol Testing	Yes	No	Does Not Know
.3, .101 .201, .245	1. Does the company have a plan for drug and alcohol testing of employees and contractors performing, or ready to perform, covered functions of operations, maintenance, and emergency response?		X	
Comments	At the time of inspection no drug / alcohol plan could be produced			
.3 .105(c) .225(b)	2. Does the company perform random drug testing and reasonable suspicion drug and alcohol testing of employees performing covered functions? For random drug testing, enter the number of times per year employees are selected and the number of employees in each selection in Comments below.		X	
Comments	2014 was the last drug test results			
.3 .105(b)	3. Does the company conduct post-accident/incident drug and alcohol testing for employees who have caused or contributed to the consequences of an accident/incident? Enter the position/title of the employee who would make the decision to conduct post-accident/incident testing in Comments below.		X	
Comments				
.113(c) .117(a)(4) .227(b)(2) .241	4. Does the company provide training for supervisors on the detection of potential drug abuse (minimum 60 minutes) and alcohol misuse (minimum 60 minutes)?		X	
Comments				
.3 .113(b) .117(a)(4) .239(b)(11)	5. Does the company give covered employees an explanation of the drug & alcohol policies and distribute information about the Employee Assistance Program, including a hotline number? Provide details in Comments below.		X	
Comments				

Training and Qualification - Operator Qualification

1. Operator Qualification Plan and Covered Tasks (detail) *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks? (TQ.OQ.OQPLAN.P) (detail)*

192.805(a) (192.801(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Sec 2 and section 1

2. Reevaluation Intervals for Covered Tasks (detail) *Does the process establish and justify requirements for reevaluation intervals for each covered task? (TQ.OQ.REEVALINTERVAL.P) (detail)*

192.805(g)

Sat+	Sat	Concern	Unsat	NA	NC
			X		

Notes

Not in plan

3. Contractors Adhering to OQ Plan (detail) *Does the process require the OQ plan to be communicated to contractors and ensure that contractors are following the plan? (TQ.OQ.OQPLANCONTRACTOR.P) (detail)*

192.805(b) (192.805(f); 192.805(c))

Sat+	Sat	Concern	Unsat	NA	NC
			X		

Notes

Not in plan

4. Contractor and Other Entity Qualification (detail) *Does the process require contractor organizations or other entities that perform covered tasks on behalf of the operator to be qualified? (TQ.OQ.OQCONTRACTOR.P) (detail)*

192.805(b) (192.805(c); 192.855(d); 192.805(e); 192.805(f))

Sat+	Sat	Concern	Unsat	NA	NC
			X		

Notes

Not in plan

6. Contractor and Other Entity Qualification (detail) *Are adequate records maintained for contractor personnel qualifications that contain the required elements? (TQ.OQ.OQCONTRACTOR.R) (detail)*

192.807(a) (192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
			X		

Notes

Not in plan

7. Management of Other Entities Performing Covered Tasks (detail) *Do records document evaluation of the other entity (ies) performing covered task(s) on behalf of the operator (e.g., through mutual assistance agreements) prior to performing task? (TQ.OQ.OTHERENTITY.R) (detail)*

192.805(b) (192.805(c); 192.803)

Sat+	Sat	Concern	Unsat	NA	NC
			X		

Notes

No records

8. Evaluation Methods (detail) Are evaluation methods established and documented appropriate to each covered task? (TQ.OQ.EVALMETHOD.P) (detail)

192.805(b) (192.803; 192.809(d); 192.809(e))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan

9. Evaluation Methods (detail) Do records indicate evaluation methods are documented for covered tasks and consistent with personnel qualification records? (TQ.OQ.EVALMETHOD.R) (detail)

192.805(b) (192.803; 192.809(d); 192.809(e))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Records given from midsouth utility services has written test only

10. Abnormal Operating Conditions (detail) Does the process require: 1) individuals performing covered tasks be qualified to recognize and react to abnormal operating conditions (AOCs), 2) evaluation and qualification of individuals for their capability to recognize and react to AOCs, 3) AOCs identified as those that the individual may reasonably anticipate and appropriately react to during the performance of the covered task, and 4) established provisions for communicating AOCs for the purpose of qualifying individuals? (TQ.OQ.ABNORMAL.P) (detail)

192.803

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan

11. Abnormal Operating Conditions (detail) Do records document evaluation of qualified individuals for recognition and reaction to AOCs? (TQ.OQ.ABNORMAL.R) (detail)

192.807(a) (192.807(b); 192.803)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
No records could be produced

12. Qualification Records for Personnel Performing Covered Tasks (detail) Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified? (TQ.OQ.RECORDS.R) (detail)

192.807

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Eddie Brake and Jordon Shaw 9-19,20-2017 written test only

No hands on Also Jordon shaw stated person performing OQ training put in video only and assisted them on tests

13. Planning for Mergers and Acquisitions (Due Diligence re: Acquiring Qualified Individuals) (detail) Does the process adequately manage qualifications of individuals performing covered tasks during program integration following a merger or acquisition? (TQ.OQ.MERGERACQ.P) (detail)

192.805(b) (192.803)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes
Not in plan

14. Training Requirements (Initial, Retraining, and Reevaluation) (detail) Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks? (TQ.OQ.TRAINING.P) (detail)

192.805(h)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Sec 1 and sec 7

16. Covered Task Performed by Non-Qualified Individual (detail) Are there provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are there restrictions and limitations placed on such activities? (TQ.OQ.NONQUALIFIED.P) (detail)

192.805(c)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Sec 1

17. Personnel Performance Monitoring (detail) Does the program include provisions to evaluate an individual if there is reason to believe the individual is no longer qualified to perform a covered task based on: covered task performance by an individual contributed to an incident or accident; other factors affecting the performance of covered tasks? (TQ.OQ.PERFMONITOR.P) (detail)

192.805(d) (192.805(e))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Sec 1 poor performance of a covered task

19. Program Performance and Improvement (detail) Does the process require evaluation of the OQ program and implementation of improvements to enhance the effectiveness of the program? (TQ.OQ.PROGRAMEVAL.P) (detail)

192.605(a) (192.605(b)(8))

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Not in plan

21. Management of Changes (detail) Does the OQ program identify how changes to procedures, tools standards and other elements used by individuals in performing covered tasks are communicated to the individuals, including contractor individuals, and how these changes are implemented in the evaluation method(s)? (TQ.OQ.MOC.P) (detail)

192.805(f)

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes

Sec 1 changes affecting covered tasks

22. Notification of Significant Plan Changes (detail) Does the process require significant OQ program changes to be identified and the Administrator or State agency notified? (TQ.OQ.CHANGENOTIFY.P) (detail)

192.805(i)

Sat+	Sat	Concern	Unsat	NA	NC
			x		

Notes

Not in plan

Training and Qualification - OQ Protocol 9

1. Covered Task Performance (detail) *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.* (TQ.PROT9.TASKPERFORMANCE.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

At the time of inspection the operator did not have a oq qualified operator

2. Qualification Status (detail) *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.* (TQ.PROT9.QUALIFICATIONSTATUS.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

3. Abnormal Operating Condition Recognition and Reaction (detail) *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.* (TQ.PROT9.AOCRECOG.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

4. Verification of Qualification (detail) *Verify the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.* (TQ.PROT9.VERIFYQUAL.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

5. Program Inspection Deficiencies (detail) *Have potential issues identified by the headquarters inspection process been corrected at the operational level?* (TQ.PROT9.CORRECTION.O) (detail)

192.801(a) (192.809(a))

Sat+	Sat	Concern	Unsat	NA	NC
					x

Notes

Distribution Integrity Management Program

Implementation Inspection Form

This inspection form is for the evaluation of an operator's implementation of its gas distribution integrity management program (DIMP) through a review of its records and actions performed on pipeline facilities. This inspection form is applicable to operators, other than Master Meter and Small LPG operators, that have developed and implemented a DIMP under §192.1005. The form asks inspectors to review records and perform field observations regarding the implementation of the DIMP required elements. Following a review of the operator's DIMP plan, inspectors will observe actions taken by the operator to ensure that procedures have been followed. There are instances when actions by an operator could be deemed satisfactory by an inspector for an implementation question while still not meeting the procedural requirements in the DIMP plan resulting in an unsatisfactory rating for a corresponding procedural question.

Questions with code references beside them are enforceable. "S/Y" stands for "satisfactory" or "yes"; "U/N" stands for "unsatisfactory" or "no"; "N/A" stands for "not applicable"; and "N/C" stands for "not checked". If an item is marked U/N, N/A, or N/C, an explanation must be included in the comments section. Due to the unique characteristics of some operator's system, there are instances where an operator is not required to perform an action, and some of the questions requesting a review of documents may not apply and would be rated as "N/A" (rather than rating "U/N"). For instance, in Question #8, if the operator has NOT acquired any new information relevant to threat identification, rate as "N/A". Correspondingly, if the operator had acquired new information that needed to be included in the threat identification and had not, then the rating would be "U/N".

This inspection form includes two types of activities – records review and field observation activities:

- The Records Review questions are to be performed on records used by an operator for implementing its DIMP plan. Not all parts of this form may be applicable to a specific Records Review Inspection, and only those applicable portions of this form need to be completed.
- The Field Observation questions are to be used on field activities being performed by an operator in support of its DIMP plan. Field Observation inspection activities may also include review of data, environmental conditions, and assumptions being used by an operator in support of its DIMP plan. Not all parts of this form may be applicable to a specific Field Observation Inspection, and only those applicable portions of this form need to be completed.

A review of applicable Operations and Maintenance (O&M) and DIMP processes and procedures applicable to the field activity being inspected should be considered by the inspector to ensure the operator is implementing its O&M Manuals and DIMP in a consistent manner.

PHMSA Form 24 - Gas Distribution System DIMP Implementation Inspection, July 7, 2014, Rev 0

Operator Contact and System Information

Operator Information:

Name of Operator (legal entity):	City of Drakesboro
PHMSA Operator ID:	Unknown
Type of Operator:	<input type="checkbox"/> Investor Owned <input checked="" type="checkbox"/> Municipal <input type="checkbox"/> Private <input type="checkbox"/> LPG <input type="checkbox"/> Other (Identify - e.g., cooperative)
State(s) included in this inspection	KY
Headquarters Address:	212 Mose Rader Blvd. Drakesboro, KY 42337
Company Contact:	Mayor Mike Jones
Phone Number:	
Email:	
Date(s) of Inspection	2-19-2019
Date of this Report	2-19-2019
Date of Current DIMP Plan/Revision	None

Persons Interviewed:

Persons Interviewed (list primary contact first)	Title	Phone Number	Email
None			

State/Federal Representatives:

Inspector Name and Agency	Phone Number	Email
Melissa Holbrook	502-564-3940	Melissac.holbrook@ky.gov

System Description Narrative: At the time of 2019 inspection no dimp program could be produced for inspection.

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Rev 0**

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
		192.1005	Issues Identified in previous Integrity Management Inspection(s)			
1	* - If not satisfactory, insert appropriate code section(s)	Have all issues raised in previous DIMP inspections been satisfactorily addressed? Provide comments below.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
		192.1007(a)	Knowledge of the system			
2	.1007 (a)(3)	Is the operator collecting the missing or incomplete system information and data needed to fill knowledge gaps to assess existing and potential threats?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
3	.1007 (a)(3)	Is the operator collecting the missing or incomplete system information and data using the procedures prescribed in its DIMP plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
4	.1007 (a)(3)	Has the operator incorporated into the DIMP plan any new or missing information identified or acquired during normal operations, maintenance, and inspection activities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
5	.1007(a)(5)	Has the operator captured required data on any new pipeline installations? For pipe, fittings, valves, EFVs, risers, regulators, shut-offs, etc., examples of data and records required to be collected by operator since August 2, 2011 include, but are not limited to, the following: <ul style="list-style-type: none"> • Location • Material type and size • Wall thickness or SDR • Manufacturer • Lot or production number 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

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Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
6	.1007 (a)	Are data collection forms used in conjunction with the operator's DIMP plan being fully and accurately completed? Note: This question can be answered by office review of records and/or comparison of field conditions to information in the reviewed records.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
7	.1007 (a)	If new Subject Matter Experts (SMEs) input is incorporated into the DIMP plan, do SMEs have the necessary knowledge and/or experience (skills sets) regarding the areas of expertise for which the SME provided knowledge or supplemental information for input into the DIMP plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
8	.1007 (a)	Do operator personnel in the field understand their responsibilities under DIMP plan? (Below are possible questions for field personnel) <ul style="list-style-type: none"> • Would you explain what DIMP training you have received? • What instructions have you received to address the discovery of pipe or components not documented in the company records? • What instructions have you received if you find a possible issue? (ex: corrosion, dented pipe, poor fusion joints, missing coating, excavation damage, mechanical fitting failures) • If you find situations where the facilities examined (e.g., size of the pipe, coating) are different than records indicate, what documentation do you prepare? • If you are repairing a leak and find that a fitting was improperly installed, what documentation do you prepare? 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

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Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007 (b) and (c)	Identify Threats; Evaluate and Rank Risk				
9	.1007(b)	Has the operator acquired any new information relevant to system knowledge that may affect its threat identification?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
10	.1007 (b)	Have any changes occurred that require re-evaluation of threats and risks? Examples include, but are not limited to, the following: <ul style="list-style-type: none"> • Acquisition of new systems • Completion of pipe replacement program • New threats (e.g., first time natural forces damage, etc.) • Increase in existing threats (e.g., washouts, land subsidence, etc.) • Increase in consequences (e.g., new wall-to-wall pavement, etc.) • Organization changes (e.g., downsizing of staff, company restructuring, etc.) • Applicable code revisions • Other (describe below) 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
11	.1007 (b)	Has the operator identified information or data from external sources (e.g. trade associations, operator's consultants, government agencies, other operators, manufacturers, etc.) that may require re-evaluation of threats and risks?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
12	.1007 (c)	Since the last DIMP plan review by the regulatory agency, has the operator updated its threat identification and risk assessment based on newly acquired information or data (see Questions 9, 10, and 11) relevant to system knowledge?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

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Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007 (b) and (c)	Identify Threats; Evaluate and Rank Risk				
13	.1007 (c)	If the operator has modified its threat identification and risk evaluation and ranking, were the revisions made in accordance with the procedure in the operator's DIMP plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
14	.1007 (c)	Does the operator's current subdivision process (grouping of materials, geographic areas, etc.) adequately meet the need to properly evaluate and rank the existing and potential threats to the integrity of its system?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
15	.1007 (c)	Has the operator added or modified system subdivisions within its risk evaluation and ranking since the last plan review by the regulatory agency?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
16	.1007 (c)	If the operator has added or modified system subdivisions, was it done in accordance with the procedures described in the operator's DIMP plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
17	.1007 (c)	If the operator has added or modified system subdivisions, did the new system subdivision result in modifications to the risk evaluation and ranking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

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Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007(d)	Identify and implement measures to address risks				
18	.1007 (d)	Does the documentation reviewed demonstrate the operator is implementing the measures to reduce risks per the DIMP plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19	.1007 (d)	Has the operator completed any measures to reduce risks resulting in the elimination/mitigation of the associated identified threat? (e.g., pipe replacement program completed, etc.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
20	.1007 (d)	If answering "Satisfactory/Yes" to question 19, has the operator re-evaluated and ranked its risks (1007(c)) because of the elimination/mitigation of an identified threat to ensure that risk reduction measures in place are appropriate?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
21	.1007 (d)	Does each implemented risk reduction measure identified in the DIMP plan address a specific risk?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
22	.1007 (d)	Can the operator provide documentation to demonstrate that an effective leak management program is being implemented? Important components in an effective program include, but are not limited to, the following: <u>Locate</u> the leaks in the distribution system; <u>Evaluate</u> the actual or potential hazards associated with these leaks; <u>Act</u> appropriately to mitigate these hazards; <u>Keep</u> records; and <u>Self-assess</u> to determine if additional actions are necessary to keep people and property safe. Answer "N/A" if operator repairs all leaks when found.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

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Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007(e)	Measure performance, monitor results, and evaluate effectiveness				
23	.1007 (e)	<p>Is the operator collecting data for the required performance measures in §192.1007(e)?</p> <p>i) Number of hazardous leaks either eliminated or repaired, categorized by cause? <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>ii) Number of excavation damages? <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>iii) Number of excavation tickets? <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>iv) Total number of leaks either eliminated or repaired, categorized by cause? <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>v) Number of hazardous leaks either eliminated or repaired, categorized by material? (Note: Not required in PHMSA Distribution Annual Report Form 7100.1-1) <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the DIMP plan in controlling each identified threat? (Note: Not required in PHMSA Distribution Annual Report Form 7100.1-1) <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p>				
Inspector Comments						
24	.1007 (e)	Based on field observations and/or record reviews, is the operator accurately collecting the data used to measure performance in accordance with the procedures in its DIMP plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
25	.1007 (e)	Is the operator monitoring each performance measure from an established baseline?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
26	.1007 (e)	Is each performance measure added since the DIMP plan was last updated tied to a specific risk reduction measure or group of measures?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

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Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007(f)	Periodic Evaluation and Improvement				
27	.1007 (f)	Has the operator performed a periodic evaluation of its DIMP plan on the frequency specified in the plan? If a periodic evaluation has not been required since plan implementation or the last inspection, mark questions 27-32 as "N/A".	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
28	.1007 (f)	Did the periodic evaluation include the following: <ul style="list-style-type: none"> • Verification of general system information (e.g., contact information; form names; action schedules, etc.)? • New information acquired since the previous evaluation? • Review of threats and risks? • Was the risk model re-run? • Review of performance measures? • Review of measures to reduce risks? • Evaluation of the effectiveness of measures to reduce risks? • Modification of measures to reduce risks, if necessary? 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
29	.1007 (e)	If any established performance measures indicated an increase in risk beyond an acceptable level (as established in the DIMP plan), did the operator implement new risk reduction measures along with their associated performance measures?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
30	.1007 (f)	If the periodic evaluation indicates that <u>implemented measures to reduce risks</u> are NOT effective, were risk reduction measures modified, deleted or added?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

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Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
31	.1007 (f)	Did the periodic evaluation indicate that the selected <u>performance measures</u> are assessing the effectiveness of risk reduction measures? If not, were performance measures modified, deleted or added? (describe in Inspector comments)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
32	.1007 (f)	Did the operator follow its procedures in conducting periodic evaluation and program improvement?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
	192.1007 (g)	Report results				
33	.1007(g)	Did the operator complete Parts C and D of the PHMSA Distribution Annual Report (Form 7100.1-1) in its submission to PHMSA and the state regulatory authority having jurisdiction, if required, for each year since the last inspection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
	192.1009	What must an operator report when mechanical fittings fail?				
34	.1009	Has the operator maintained accurate records documenting mechanical fitting failures resulting in hazardous leaks?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

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Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
		192.1011	What records must an operator keep?			
37	.1011	Is the operator retaining the records demonstrating compliance with Subpart P, as specified in its DIMP plan, for 10 years (or since 08/02/2011)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
38	.1011	Did the operator retain for 10 years (or since 08/02/2011) copies of superseded DIMP plans?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
39	.1011	Did the operator follow its DIMP procedures applicable to records retention? If answered "Unsatisfactory/No", then list those procedures not followed below.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
		192.1013	When may an operator deviate from required periodic inspections under this part?			
40	.1013 (c)	Has the operator received approval from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? (If no, mark questions 40-44 "N/A")	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
41	.1013 (c)	Has the operator conducted the periodic inspections at the specified alternate intervals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
42	.1013 (c)	Has the operator complied with all conditions that were required as part of the alternate inspection interval approval? If answered "Unsatisfactory/No", then provide comments below.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

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Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
43	.1013 (c)	Do performance measure records indicate that an equal or greater overall level of safety has been achieved since the alternate inspection frequency was implemented?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						
44	.1013 (c)	If that an equal or greater overall level of safety has not been achieved, is the operator taking corrective action? Provide comments below regarding corrective actions taken or lack thereof.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

Additional Inspector Comments: The 2019 inspection no dimp plan could be produced.

The records indicated there could be a dimp program through shrimp.

SUPPLEMENTAL INSPECTION QUESTIONS

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked (U, N/A, or N/C must include an explanation if checked)

SUPPLEMENTAL INSPECTION QUESTIONS		S	U	N/A	N/C
NTSB SUPPLEMENTAL INSPECTION QUESTIONS					
Review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization.				x	
	If necessary, was remedial action taken?			x	
Review operator procedures for surveillance of cast iron pipelines				x	
	Was appropriate action taken resulting from tracking circumferential cracking failures, study of failures, study of leakage history, or other unusual operating maintenance condition? (See GPTC Appendix G-18 for guidance)			x	
Review operator emergency response procedures for leaks caused by excavation damage near buildings.			x		
	Do procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings (Refer to 4/12/01 letter from PHMSA)		x		
Review operator records of previous accidents and failures (including reported third party damage and leak response) to ensure appropriate operator response as required by 192.617.			x		
THIRD PARTY/EXCAVATION DAMAGE PREVENTION SUPPLEMENTAL QUESTIONS					
Review directional drilling/boring procedures of operator or its contractor – do they include actions to protect their facilities from the dangers posed by drilling and other trenchless technologies?			x		
Is operator following its written procedures pertaining to notification of excavation, marking, positive response, and the availability and use of the one-call system?			x		
Has operator adopted the CGA Best Practices document as a means of reducing damages to all underground facilities?			x		
	If no, encourage and promote the adoption of CGA Best Practices document.		x		
Review operators records of accidents and failures due to excavation damage to ensure causes of failure are addressed to minimize the possibility of recurrence as required by 192.617.			x		
PLASTIC PIPE DEFECTS/LEAKS & NPMS DATABASE SUPPLEMENTAL QUESTIONS					
Has operator identified any plastic pipe and /or components that have shown a record of defects/leaks?			x		
	If yes, what is operator doing to mitigate the safety concerns?		x		
If transmission, has operator submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submittal?				x	
Comments:					

CYBERSECURITY QUESTIONNAIRE

49 CFR 192.605 Procedural manual for operations, maintenance, and emergencies.
807 KAR 5:022 Section 13(7) Continuing surveillance of operational systems.

1. Does the operator utilize any business or operational systems which may be vulnerable to cybersecurity concerns?

Yes	No	NA	NC
	x		

Notes

2. Has the operator developed and implemented a cybersecurity written plan that includes assessing and mitigating vulnerabilities for critical infrastructure and essential business systems? Describe.

Yes	No	NA	NC
	x		

Notes

3. Has the operator utilized any internal or external resources and/or personnel assigned specifically with accessing and/or analyzing cybersecurity threats and vulnerabilities? Describe.

Yes	No	NA	NC
	x		

Notes

4. Are cybersecurity threats considered as part of the operator's overall operations and maintenance plans?

Yes	No	NA	NC
	x		

Notes

5. Has the operator experienced any cyber-attacks related to its business or operational systems? Describe.

Yes	No	NA	NC
	x		

Notes

6. Identify personnel with specific responsibilities for cybersecurity within your organization?

Yes	No	NA	NC
	x		

Notes

Public Awareness Program Effectiveness

1. Public Education Program (detail) <i>Has the continuing public education (awareness) program been established as required? (PD.PA.PROGRAM.P) (detail)</i>						
192.616(a) (192.616(h))	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes At the time of 2019 inspection no public awareness plan could be produced for inspection.						

2. Management Support of Public Awareness Program (detail) <i>Does the operator's program documentation demonstrate management support? (PD.PA.MGMTSUPPORT.P) (detail)</i>						
192.616(a) (API RP 1162 Section 2.5; API RP 1162 Section 7.1)	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes						

3. Asset Identification (detail) <i>Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each? (PD.PA.ASSETS.P) (detail)</i>						
192.616(b) (API RP 1162 Section 2.7 Step 4)	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes						

4. Audience Identification (detail) <i>Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents? (PD.PA.AUDIENCEID.P) (detail)</i>						
192.616(d) (192.616(e); 192.616(f); API RP 1162 Section 2.2; API RP 1162 Section 3)	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes						

5. Audience Identification Records (detail) <i>Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages? (PD.PA.AUDIENCEID.R) (detail)</i>						
192.616(d) (192.616(e); 192.616(f); API RP 1162 Section 2.2; API RP 1162 Section 3)	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes No records could be produced to review						

6. Messages, Delivery Methods, and Frequencies (detail) <i>Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where gas is transported? (PD.PA.MESSAGES.P) (detail)</i>						
192.616(c) (API RP 1162 Section 3; API RP 1162 Section 4; API RP 1162 Section 5)	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes						

7. Consideration of Supplemental Enhancements (detail) <i>Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162? (PD.PA.SUPPLEMENTAL.P) (detail)</i>						
192.616(c) (API RP 1162 Section 6.2)	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes						

8. Educational Provisions (detail) <i>Did delivered messages specifically include provisions to educate the public, emergency officials, local public officials, and excavators on: (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with unintended releases from a gas pipeline facility; (3) Physical indications of a possible release; (4) Steps to be taken for public safety in the event of a gas pipeline release; and (5) Procedures to report such an event? (PD.PA.EDUCATE.R) (detail)</i>						
192.616(d) (192.616(f))	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes						

9. Messages on Pipeline Facility Locations (detail) <i>Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations? (PD.PA.LOCATIONMESSAGE.R) (detail)</i>						
192.616(e) (192.616(f))	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes						

10. Baseline Message Delivery Frequency (detail) <i>Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3? (PD.PA.MESSAGEFREQUENCY.R) (detail)</i>						
192.616(c) (API RP 1162 Table 2-1; API RP 1162 Table 2-2; API RP 1162 Table 2-3)	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes						

11. Liaison with Public Officials (detail) <i>(presented above) Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures? (EP.ERG.LIAISON.R) (detail)</i>						
192.605(a) (192.615(c)(1); 192.615(c)(2); 192.615(c)(3); 192.615(c)(4); 192.616(c); ADB-05-03)	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes no records could be produced at the time of inspection.						

12. Other Languages (detail) <i>Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas? (PD.PA.LANGUAGE.P) (detail)</i>						
192.616(g) (API RP 1162 Section 2.3.1)	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes						

13. Other Languages (detail) (presented above) <i>Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?</i> (PD.PA.LANGUAGE.R) (detail)						
192.616(g) (API RP 1162 Section 2.3.1)	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes						

14. Evaluation Plan (detail) <i>Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?</i> (PD.PA.EVALPLAN.P) (detail)						
192.616(i) (192.616(c); API RP 1162 Section 8; API RP 1162 Appendix E)	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes						

15. Evaluate Program Implementation (detail) <i>Has an audit or review of the operator's program implementation been performed annually since the program was developed?</i> (PD.PA.EVALIMPL.R) (detail)						
192.616(c) (192.616(i); API RP 1162 Section 8.3)	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes						

16. Acceptable Methods for Program Implementation Audits (detail) <i>Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of program implementation?</i> (PD.PA.AUDITMETHODS.R) (detail)						
192.616(c) (192.616(i); API RP 1162 Section 8.3)	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes						

17. Program Changes and Improvements (detail) *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?* (PD.PA.PROGRAMIMPROVE.R) (detail)

192.616(c) (API RP 1162 Section 8.3)	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes						

18. Evaluating Program Effectiveness (detail) *(presented above) Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?* (PD.PA.EVALEFFECTIVENESS.R) (detail)

192.616(c) (API RP 1162 Section 8.4)	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes						

19. Measure Program Outreach (detail) *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?* (PD.PA.MEASUREOUTREACH.R) (detail)

192.616(c) (API RP 1162 Section 8.4.1)	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes						

20. Measure Understandability of Message Content (detail) *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?* (PD.PA.MEASUREUNDERSTANDABILITY.R) (detail)

192.616(c) (API RP 1162 Section 8.4.2)	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes						

21. Measure Desired Stakeholder Behavior (detail) <i>In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited? (PD.PA.MEASUREBEHAVIOR.R) (detail)</i>						
192.616(c) (API RP 1162 Section 8.4.3)	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes						

22. Measure Bottom-Line Results (detail) <i>Were bottom-line results of the program measured by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures? (PD.PA.MEASUREBOTTOM.R) (detail)</i>						
192.616(c) (API RP 1162 Section 8.4.4)	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes						

23. Program Changes (detail) <i>Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations? (PD.PA.CHANGES.R) (detail)</i>						
192.616(c) (API RP 1162 Section 2.7 (Step 12); API RP 1162 Section 8.5)	Sat+	Sat	Concern	Unsat	NA	NC
				X		
Notes						

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