CASE NUMBER: 99-07

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

MOREHEAD STATE UNIVERSITY) INVESTIGATOIN INTO ALLEGED VIOLATIONS) OF 807 KAR 5:022, SECTIONS 4(13); 9(13);) CASE NO. 10(4); 10(16); 13(9); 14(5)©; 14(13)(d); 14(21);) 99-071 14(23), AND 14(25) AND 49 CFR 192.201;) 192.375; 192.455; 192.479; 192.615; 192.707;) 192.723; 192.739; 192.743; AND 192.747)

RECEIPT OF PAYMENT

This is to acknowledge receipt of one check in the amount of \$500.00, payable to Treasurer, Commonwealth of Kentucky on October 25, 1999 from Morehead State University. This represents full payment of the penalty assessed against them in the above-styled action.

Stephanie Bell Secretary of the Commission Dated <u>November 3, 1999</u>



COMMONWEALTH OF KENTUCKY **PUBLIC SERVICE COMMISSION** 730 SCHENKEL LANE POST OFFICE BOX 615 FRANKFORT, KY. 40602 (502) 564-3940

CERTIFICATE OF SERVICE

RE: Case No. 99-071 MOREHEAD STATE UNIVERSITY

I, Stephanie Bell, Secretary of the Public Service Commission, hereby certify that the enclosed attested copy of the Commission's Order in the above case was served upon the following by U.S. Mail on October 20, 1999.

Parties of Record:

Ronald G. Eaglin President Morehead State University W. H. Rice Service Building UPO 831 Morehead, KY. 40351 1689

Honorable Jon A. Woodall Counsel for Morehead State McBrayer, McGinnis, Leslie & Kirkland, PLLC 163 West Short Street Suite 300 Lexington, KY. 40507

Secretary of the Commission

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

MOREHEAD STATE UNIVERSITY

INVESTIGATION INTO ALLEGED VIOLATIONS OF 807 KAR 5:022, SECTIONS 4(13); 9(13); 10(4); 10(16); 13(9); 14(5)(c); 14(13)(d); 14(21); 14(23), AND 14(25) AND 49 CFR 192.201; 192.375; 192.455; 192.479; 192.615; 192.707; 192.723; 192.739; 192.743; AND 192.747

CASE NO. 99-071

<u>order</u>

On March 9, 1999, the Commission directed Morehead State University ("MSU") to appear at a hearing to show cause why it should not be penalized, pursuant to KRS 278.990(1) and KRS 278.992(1), for its alleged violations of Commission regulation 807 KAR 5:022 and the corresponding and respective parts and sections of the Natural Gas Pipeline Safety Act of 1968 and any subsequent amendments thereof (49 CFR 192).

Shortly after the commencement of this proceeding, MSU and Commission Staff entered into negotiations to resolve all outstanding issues. On the 22nd day of September, 1999, they executed a Settlement Agreement, which is appended hereto. In reviewing the Settlement Agreement, the Commission has considered, *inter alia*, the circumstances and seriousness surrounding the alleged violations relative to MSU's natural gas distribution system that is the subject of this proceeding, and MSU's efforts to comply with the Commission's regulations. After reviewing the Settlement Agreement and being otherwise sufficiently advised, the Commission finds that the Agreement is in accordance with the law, does not violate any regulatory principle, results in a reasonable solution of this case, and is in the public interest.

IT IS THEREFORE ORDERED that:

1. The Settlement Agreement is incorporated into this Order as if fully set out herein.

2. The terms and conditions set forth in the Settlement Agreement are hereby adopted and approved.

3. Within 10 days of the date of this Order, MSU shall pay to the Commonwealth of Kentucky the sum of Five Hundred Dollars (\$500). This payment shall be in the form of a cashier's check made payable to "Treasurer, Commonwealth of Kentucky," and shall be mailed or delivered to the Office of General Counsel, Public Service Commission, 730 Schenkel Lane, Post Office Box 615, Frankfort, Kentucky 40602.

4. This case is closed and shall be removed from the Commission's docket. Done at Frankfort, Kentucky, this 20th day of October, 1999.

By the Commission

ATTEST:

APPENDIX

APPENDIX TO AN ORDER OF THE

KENTUCKY PUBLIC SERVICE COMMISSION

IN CASE NO. 99-071

DATED OCTOBER 20, 1999

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

MOREHEAD STATE UNIVERSITY

INVESTIGATION INTO ALLEGED VIOLATIONS OF 807 KAR 5:022, SECTIONS 4(13); 9(13); 10(4); 10(16); 13(9); 14(5)(c); 14(13)(d); 14(21); 14(23), AND 14(25) AND 49 CFR 192.201; 192.375; 192.455; 192.479; 192.615; 192.707; 192.723; 192.739; 192.743; AND 192.747

CASE NO. 99-071

SETTLEMENT AGREEMENT

This Settlement Agreement, made and entered into on this <u>22</u> day of <u>Subtantin</u>, 1999, between Morehead State University ("MSU") and the Staff of the Public Service Commission ("Commission Staff").

WITNESSETH:

WHEREAS, Commission Staff issued a Comprehensive Inspection Report ("Report") dated January 11, 1999 detailing an inspection conducted on December 17, 1998. This inspection was conducted of a natural gas system operated and maintained by MSU as a master-meter gas system. The inspection was conducted by Commission Staff member, David Kinman, together with Joe Planck and Todd Thacker of MSU.

WHEREAS, on March 9, 1999, the Public Service Commission ("Commission") entered a show cause Order in Case No. 99-071 against MSU in which it found sufficient evidence to believe that MSU failed to comply with 10 sections of 807 KAR 5:022 and the corresponding and respective parts and sections of the Natural Gas Pipeline Safety Act of 1968 and subsequent revisions thereof (49 CFR 192).

WHEREAS, the Commission ordered MSU to show cause why it should not be subject to the penalties of KRS 278.990(1) and KRS 278.990(2)(1) for its alleged violations and the parties hereto desire to enter into this Settlement Agreement to resolve the issues raised by the Commission's show cause Order, and have in furtherance thereto entered into the stipulations included herein and set out below:

NOW, THEREFORE, the parties hereto mutually stipulate as follows:

1. MSU is an institution of higher education located in Morehead, Kentucky.

2. MSU is a master meter gas system receiving its gas through the Morehead Municipal Gas System.

3. MSU distributes its gas through a network of plastic and steel gas lines pressurized at approximately 20 pounds per square inch gage to numerous housing units, dormitories, classrooms, and other campus buildings used for various purposes, including cooking, heat, and hot water.

4. MSU has a duty to comply with the provisions of Chapter 278 of the Kentucky Revised Statutes, Commission regulations (807 KAR 5:022) and 49 U.S.C., Section 60101, *et seq.*

5. Commission regulations and federal standards involved in the Commission's show cause Order are as follows:

a. 807 KAR 5:022, Section 4(13) and 49 CFR 192.201. There are no calculations available to prove that the relief valves are adequate in size and capacity to prevent over-pressure.

- 2 -

b. 807 KAR 5:022, Section 9(13) and 49 CFR 192.375. Above ground plastic pipe was found at Nunn Hall Dormitory..

c. 807 KAR 5:022, Section 10(4) and 49 CFR 192.455. The risers at the Lakewood Apartments married-student area are not cathodically protected..

d. 807 KAR 5:022, Section 10(16) and 49 CFR 192.479. The risers at Mignon Hall Dormitory show evidence of atmospheric corrosion..

e. 807 KAR 5:022, Section 13(9) and 49 CFR 192.615. The emergency plan does not establish written procedures to minimize hazards resulting from pipeline emergencies.

f. 807 KAR 5:022, Section 14(5)(c) and 49 CFR 192.707. The regulator station does not have a sign denoting ownership and a telephone number to call in the event of an emergency.

g. 807 KAR 5:022, Section 14(13)(d) and 49 CFR 192.723. Leakage was noted at Mignon Hall and Nunn Hall Dormitories.

h. 807 KAR 5:022, Section 14(21) and 49 CFR 192.739. The system regulators have not been inspected annually.

i. 807 KAR 5:022, Section 14(23) and 49 CFR 192.743. The system relief valves have not been tested annually.

j. 807 KAR 5:022, Section 14(25) and 49 CFR 192.747. Key valves are not tested annually.

6. By way of a Response and a Supplemental Response filed by MSU, the above-stated and alleged violations have been either corrected or a compliance schedule has been submitted and approved by Commission Staff to correct the

- 3 -

violations in a timely manner. It is noted that MSU took immediate remedial measures to address the issues prior to the show cause Order being issued by the Commission. Further, MSU has agreed to update on a regular basis the training procedures and educational matters necessary to operate a proper distribution system.

7. These stipulations are prepared by Commission Staff and MSU for purposes of reaching a settlement of Case No. 99-071. In the event that such settlement is not reached, or the Commission does not adopt this Settlement Agreement, these proposed stipulations will be withdrawn.

8. Nothing contained herein shall be construed as an admission of a violation(s) of any Commission regulation or federal regulation by MSU, nor shall the Commission's acceptance of this Agreement be construed as a finding of a violation(s) as stated and the facts contained shall not be cited as precedent in any other proceeding except to enforce this Settlement Agreement.

9. If this Settlement Agreement is adopted by the Commission, it shall be binding upon MSU, its agents and representatives, and MSU waives any and all rights, statutory or otherwise, to challenge the Agreement before the Commission at hearing and MSU shall not petition for hearing, rehearing, or seek judicial review.

NOW, THEREFORE, MSU and Commission Staff agree that:

1. MSU shall pay a civil penalty of Five Hundred Dollars (\$500).

2. Within 10 days after the entry of an Order approving this Settlement Agreement, MSU shall pay to the order of the Commonwealth of Kentucky Five Hundred Dollars (\$500). This payment shall be in the form of a check made payable to "Treasurer, Commonwealth of Kentucky" and shall be mailed or delivered to the Office

- 4 -

of General Counsel, Public Service Commission, 730 Schenkel Lane, Post Office Box 615, Frankfort, Kentucky 40602.

3. This Agreement is subject to the acceptance of , approval by, and adoption by the Commission.

4. Nothing contained herein shall be construed as an admission of a violation of any Commission regulation by MSU, nor shall the Commission's acceptance of this Settlement Agreement be construed as a finding of a violation of a Commission regulation or federal regulation by MSU. This Settlement Agreement and stipulations contained herein may not be cited in any other matter or proceeding except to be used in a proceeding between the Commission and MSU to enforce the Settlement Agreement. This case shall be terminated upon the entry of a Commission Order accepting this Settlement Agreement in satisfaction of the show cause Order of March 9, 1999.

5. If the Commission fails to accept and approve this Settlement Agreement in its entirety, this proceeding shall go forward and each of the terms of the Settlement Agreement or any matters raised during the negotiations or contained herein shall not be binding upon any of the signatories.

6. If the Commission accepts and adopts this Settlement Agreement in its entirety and enters an Order in this proceeding to that effect, MSU shall not apply for rehearing in this matter, nor bring an action for review of that Order.

- 5 -

AGREED TO BY:

MOREHEAD STATE UNIVERSITY

By (name)

Vice Prog. det for Administration & Fisco Servisa (title) and Treasuren

MOREHEAD STATE UNIVERSITY

By ₍ Jon A. Woodall, Esq. Counsel for Morehead State University

(date)

8-31-94

(date)

PUBLIC SERVICE COMMISSION OF KENTUCKY

By

Dale Wright, Staff Attorney

September 221999 (date)



COMMONWEALTH OF KENTUCKY **PUBLIC SERVICE COMMISSION** 730 SCHENKEL LANE POST OFFICE BOX 615 FRANKFORT, KENTUCKY 40602 www.psc.state.ky.us (502) 564-3940

Ms. Helen C. Helton Executive Director Public Service Commission Post Office Box 615 Frankfort, Kentucky 40602

Re: Case No. 99-071

Dear Ms. Helton:

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Attached please find a Settlement Agreement entered into between Morehead State University and Staff for filing in the above-referenced case. The signatories to this Settlement Agreement request that the Commission review and approve it as quickly as possible.

incerely,

Dale Wright Staff Attorney

Attachment

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

RECENTED

In the Matter of:

SFD 3 1999

GENERAL COURSEL

MOREHEAD STATE UNIVERSITY

INVESTIGATION INTO ALLEGED VIOLATIONS OF 807 KAR 5:022, SECTIONS 4(13); 9(13); 10(4); 10(16); 13(9); 14(5)(c); 14(13)(d); 14(21); 14(23), AND 14(25) AND 49 CFR 192.201; 192.375; 192.455; 192.479; 192.615; 192.707; 192.723; 192.739; 192.743; AND 192.747

CASE NO. 99-071

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WHEREAS, on March 9, 1999, the Public Service Commission ("Commission") entered a show cause Order in Case No. 99-071 against MSU in which it found sufficient evidence to believe that MSU failed to comply with 10 sections of

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• `,

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1 **.** .

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- 5 -

AGREED TO BY:

MOREHEAD STATE UNIVERSITY

By (name)

Vice Progresent for Administer kun & Fisch Serviss (title) and Treasuren

MOREHEAD STATE UNIVERSITY By _d

Jon A. Woodall, Esq. Counsel for Morehead State University

9|2|99 (date)

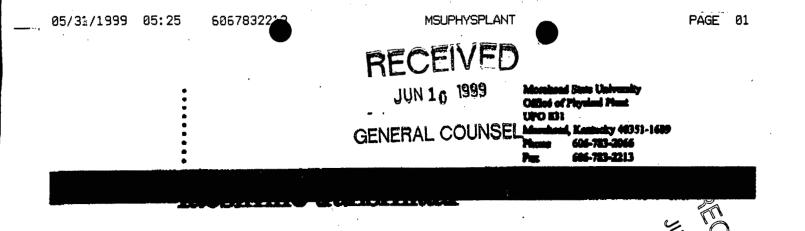
8-31-99

(date)

PUBLIC SERVICE COMMISSION OF KENTUCKY

By Dale Wright, Staff Attorney

September 22/999 (date)



CENTED Deal 4/2 199 36 ĊC. ۵ C) the

I MARKED 10 INSIDE REGULATORS that I RECOMMENT TO TODD THACKEN that they be checked ANNUALLY NENDED

Monchand STATE UNIVERSTY Cone No. 99-071

MOREHEAD STATE UNIVERSITY

GAS REGULATOR INSPECTION

REGULATOR & PRESSURE RELIEF DATA

MAY 1999

Maare Pipeline Corrosion Services 1063 Iroquais Dr. Mt. Sterling, Kontucky 40353 606-498-2516

(

MOREHEAD STATE UNIVERSITY REGULATOR, RELIEF INSPECTION DATA

ALLIE YOUNG BUILDING

Meter Location Inside-Outside	OUTSIDE	1.		
Inlet Shut Off Valve Size & Location	n (inside or out)	" OUT SIDE		
Meter Kind & Size Singer 3.5	5			·
Regulator Location OUT SIDE				1 2 4
Regulator Kind & Size AMERICA		803	ORFICE	= 28
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Relief Valve Size & Condition	INTEGNOL Rel	10 auri 5 105	•	
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Inspection Completed by front - John Take Date 1-27.99

YEARLy

ALUMNI TOWER

Meter Location Inside-Outside 7~5106	
Inlet Shut Off Valve Size & Location (inside or out) Treside 2"	
Meter Kind & Size American 7/125	
Regulator Location INSIDE	
Regulator Kind & Size 1" FISHER 5201- 623 DRFICE = 34 8-18.5	· 1/1
Regulator Lock Up.= (10.5) INLET PR (29) OUTLET PR (
Relief Valve Size & Condition. Internet Relief	
Relieved At. What Pressure NA - SEE 5-14 - 99 Balow	
Corrections Needed or Important Notes:	
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Forn: 9° WC	
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Forms 9" NC	
Huse her Leck Plaged Mf admit Idl Hacker	•
FRANK WHITHER	

Frink & he filing 1-26-11 Date Inspection Completed by.___

YGARLY

BAIRD MUSIC BUILDING

Meter Location Inside-Outside <u>Trisipe</u>
Inlet Shut Off Valve Size & Location (inside or out) /" Out side
Meter Kind & Size farren 2500 Moree 5016570
Regulator Location Outside
Regulator Kind & Size Pockwell 243 1/2 Octaves Lyx 10
Regulator Kind & Size <u>Pockwell</u> <u>243</u> 1/2 Regulator Lock Up.= $(10;)$ <u>INTER PR</u> (16) <u>OUTIF</u> <u>PR</u> (1"!"WC) Refute Size & Condition ("" = Struct
Relief Valve Size & Condition. /" INT +RNAL RELIER
Relieved At. What Pressure N/A Ser 5-6-59 Berew.
Corrections Needed or Important Notes:
5-6-99 - OLD REFULMING NOT ROLING
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SPRING AMAN 4-8" - lock up 7 1/2" Frans 7"
RELICHS AT 31/2" WL
FRAMA. WHY THUN

Inspection Completed by Frank & gubilain Date 1-27-99

05/31/1999 05:25 6067832243

MSUPHYSPLANT

PAGE 05

YEARLY

MOREHEAD STATE UNIVERSITY REGULATOR, RELIEF INSPECTION DATA

CARTMELL BUILDING (Did not do M&R Inspection on this building.)
Meter Location Inside-Outside Inside
Inlet Shut Off Valve Size & Location (inside or out) 2" Fasture
Meter Kind & Size AMAL Soul
Regulator Location Ins DE
Regulator Kind & Size Fisher 99 $ORFick = 7/L$
Regulator Lock Up.= (171 m) must (29^{\pm}) out (17° we)
Relief Valve Size & Condition 21- 289 H-2
Relieved At. What Pressure Full OF WATED
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5-5-99 - WATER IN RELIES VALVE 289 N-2
Spands Roman 1/2 - 244 PST 2" MUT + ONTER
5-14-99 - INSTALLO NUN ROLLET VALUE SET 21"We
Rozans ar 32" We.
FRAME WITSTAR

Inspection Completed by Fuch Sucheland Date 1.27.99

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YEARLy

MOREHEAD STATE UNIVERSITY REGULATOR, RELIEF INSPECTION DATA

.

FIELDS HALL

Meter Location Inside-Outside INSIDE
Inlet Shut Off Valve Size & Location (inside or out) 1/2 INSIDE
Meter Kind & Size AMAL 800
Regulator Location + rsion
Regulator Kind & Size 1813-0
Regulator Lock Up = $(S^{\prime\prime})$ INLET (29^{\pm}) OUTLET $($
Relief Valve Size & Condition JNTERNAL RELICA
Relieved At. What Pressure NA See 5-699 Balow
Corrections Needed or Important Notes: 12 Copper Sweat FITTINGS ON REG
VENT WERDS TO BE REPLACED WITH 1/2 BIK STEEL OK
5-6-99 - SPRING RANOUS 54-8° WC
lock up = 10" WC
Frans 8th We
RELICHE AS 16° WC
SAME SEE VININ is atra percucare.
FRANK WHITANA

Inspection Completed by Frank & whiteke Date 1-27-94

YEARLY

LAPPIN BUILDING

Meter Location Inside-Outside INSide
Inlet Shut Off Valve Size & Location (inside or out)iNSide -1"
Meter Kind & Size JC. 250 + B
Regulator Location INSIDE
Regulator Kind & Size 1st Cut. Fisher 99. Down stroom contraderice 14"
Regulator Lock Un = $\begin{pmatrix} 23 \\ 24 \end{pmatrix}$ $\frac{1}{10000000000000000000000000000000000$
Relief Valve Size & Condition. Two Releis Lives Tied together And Full
of water.
Relieved At. What Pressure ? Full of water.
Corrections Needed or Important Notes:
2 nd Stage Regulator Fisher 5 202. Relaif Value in
with on Line Connot Chuck. See upter
WE. Need To RepLACE Poleif VILVE. (2") - (289-4) water
IN. RoLaiF. VILHO
5-5-99 RELIEF VALUE FULL OF WATTON -
SPANI RANGE 1/2-214 PST 219 N-2
3" INLING BAD DA TLAT
5-14 99. REPUBLIC 2" REPUBLY VALUE INLUT PALLSVEN
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FRANK WHITTE

Inspection Completed by Jonack whiteher Date 1-27.99

05/31/1999 05:25 6067832213

YEARLY

MOREHEAD STATE UNIVERSITY REGULATOR, RELIEF INSPECTION DATA

LIBRARY TOWER

Meter Location Inside-Outside 5~5.0 R	
Inlet Shut Off Valve Size & Location (inside or out) _/*	OUTSIDE
Meter Kind & Size NOT M.e.7 = ED	
Regulator Location Outside	
Regulator Kind & Size Rockwell 193	ORFICE
Regulator Lock Up.= INLAT (29) outlet (
Relief Valve Size & Condition.	
Relieved At. What Pressure NG Sev	5-6-99 Born
Corrections Needed or Important Notes: 1/0 Test f	hus To Check Lock 42
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LOCA LUD 8" NL Frages 7"	12 RIANGAS AT 12" NC
	FRANK WHIMMA

Inspection Completed by Hank Authoration Date 1-27.99

05/31/1999 05:25 606783221

MSUPHYSPLANT

MOREHEAD STATE UNIVERSITY REGULATOR, RELIEF INSPECTION DATA

MAYS HALL

Meter Location nside-Outside Out SIDE		
Inlet Shut Off Valve Size & Location (inside or out) 2 04	TSIDE	
Meter Kind & Size AMAL 175 204.TR		
Regulator Location Out 5:06		
Regulator Kind & Size SCHLYMPEZGEG BIGE	01	EFICE NIA
Regulator Lock Up = () /// (29	···) 010	ter ()
Relief Valve Size & Condition. w/4		
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Relieved At. What Pressure 1/4 Sour 5-6-99		
Corrections Needed or Important Notes: <u>TwTisk NAL</u> P	-	
5-6-99 MOTOR ITAL BARAN REAL		
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Inspection Completed by Frank Duptuber Date 1-27-99

NORMAL

Meter Location Inside-Outside Outside
Inlet Shut Off Valve Size & Location (inside or out) 2. Outside
Meter Kind & Size AMAL 800
Regulator Location GLT 3106
Regulator Kind & Size FISHER SHORE SHORE ORFICE Y8
Regulator Kind & Size 713422 5132 Regulator Lock Up.= (11.5) $W_{Lor}(29^{H}) = W_{Ler}(11^{H} WC)$
Relief Valve Size & Condition TATEPNAL DECKEF
Relieved At. What Pressure NA See 5-10-99 Belind
Corrections Needed or Important Notes:
Return Fress 11" nd (Fishin S102) 3/4" one her
Local no 11/2" WC
Lock no 112" WC RISLING 20" WC
FARME WINTARE
<u> </u>

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MOREHEAD STATE UNIVERSITY REGULATOR, RELIEF INSPECTION DATA

NUNN HALL

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Meter Location Inside-Outsid	ie/A
Inlet Shut Off Valve Size & I	Location (inside or out) / k/" : OUT SIDE
Meter Kind & Size	
Regulator Location	515 5
Regulator Kind & Size /87	13. C SINGER (Iew) ORFICE 3/6
Regulator Lock Up.= 7	
• • •	In. INTERNAL PELIEF
·	
Relieved At. What Pressure_	15h
Corrections Needed or Impor	rtant Notes: METER HAS Beer PEMOUED
5-5-99 MAIN	
	HCM 1813C
	NG RAMEV 55-8.5
Lock	comp &"we
	as ninc
	WID 16 "WE
	Frank With man
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MOREHEAD STATE UNIVERSITY REGULATOR, RELIEF INSPECTION DATA

PRESIDENTS HOME. (Did not do M&R inspection here.) Meter Location Inside-Outside Outside JOIZTIN Inlet Shut Off Valve Size & Location (inside or out) Meter Kind & Size Amezican 30-LITE Regulator Location OLTSIDE ORACISVU 6 - 75 m. L. Regulator Kind & Size American 1813-c Regulator Lock Up.= (101) INLAT OUTLE 04 Relief Valve Size & Condition. Interne RELIEF Belar. 5-10-99 Relieved At. What Pressure SEE Corrections Needed or Important Notes: ERISAN RECURREN WORLD NOT RELIES -INSTAND NON RESENLATION LANCAS TA # 61 7" NC Flass S The No Luca un . 11" NC Raista WAIMAN PANNA

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VEARLy

RADER HALL

Meter Location Inside-Outside IN SIDE
Inlet Shut Off Valve Size & Location (inside or out) 1/2 INS IDE
Meter Kind & Size AMERICAN AMAL 800
Regulator Location
Regulator Kind & Size FISHRE S202 OLFICE YE
Regulator Lock Up. = (75π) where (29^{2}) our let ()
Relief Valve Size & Condition. /" REDUCED TO 34
Relieved At. What Pressure N/A TATERNAL RELIGE 5005 5-6-99 Balar.
Corrections Needed or Important Notes: SPRING RANGE 5.9 TN. Reg. VenT
MEEDS TO BE PEPLACED WITH I' all THE WAY OUT
5-6-99 RUSULATION VENT LINES OR. NON-
SPRING RANGE = Q-14" We
Loca up &" Ne
Frans 74." We
Reciule 16" WC
FRAME WINTAM
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Inspection Completed by Jack Muchelaho Date /-27-99

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YSARLY

REED HALL

Meter Location Inside-Outside INSIDE
Inlet Shut Off Valve Size & Location (inside or out) 2" TLASIDE
Meter Kind & Size Rock Well 10,000 Meter B21766
Regulator Location INSIDE -
Re-liter Vind & Size Gissie Sanz 1/2 ORFICE
Regulator Lock Up.= (-14.5IN) -WLET (29") OUTLET (14.5" WL)
Relief Valve Size & Condition. NO Relief Live on Reg
Relieved At. What Pressure N/A INTERNAL RELIEF Sort 5-6-99 Bar
Corrections Needed or Important Notes: Need & 1" Vent Line RAN OUTSIDE
OF BUILDING. IT HAS 2" FISHER PELIEF VENTER OWISIDE AN PELIEFS
AT 201N
5-6-99 RELICA LINCE HAVE BOTAL CONNECTOR TO REE 64
ADMINT DUPT.
Reg Fass Ar 13" We
Locas UP 14ª We
RELINS AT 22" WC
FRANKA WHITTOMA

Inspection Completed by Irank & autolat - Date 1-27-99

45RRLy

REGENTS HALL

Meter Location Inside Outside $\frac{7 \times 5 \cdot DE}{1 \times 5 \cdot DE}$ Inlet Shut Off Valve Size & Location (inside or out) $2"$ $\frac{7 \times 5 \cdot DE}{1 \times 5 \cdot DE}$ Meter Kind & Size $\frac{2 \times 5 \cdot DE}{1 \times 5 \cdot DE}$ Regulator Location $\frac{7 \times 5 \cdot DE}{1 \times 5 \cdot DE}$ Regulator Lock Up.= $(12")$ $\frac{2 \times 2 \cdot DE}{1 \times 2 \cdot DE}$ Relief Valve Size & Condition. $\frac{7 \times 7 \cdot EE \times A + E}{1 \times 2 \cdot E}$ Relief Valve Size & Condition. $\frac{7 \times 7 \cdot EE \times A + E}{1 \times 2 \cdot E}$ Relief Valve Size & Condition. $\frac{7 \times 7 \cdot EE \times A + E}{1 \times 2 \cdot E}$ Relief Valve Size & Condition. $\frac{7 \times 7 \cdot EE \times A + E}{1 \times 2 \cdot E}$ Relief Valve Size & Condition. $\frac{7 \times 7 \cdot EE \times A + E}{1 \times 2 \cdot E}$ Relief Valve Size & Condition. $\frac{7 \times 7 \cdot EE \times A + E}{1 \times 2 \cdot E}$ Relief Valve Size & Condition. $\frac{7 \times 7 \cdot EE \times A + E}{1 \times 2 \cdot E}$ Relief Valve Size & Condition. $\frac{7 \times 7 \cdot EE \times A + E}{1 \times 2 \cdot E}$ $\frac{15 \cdot 12 \cdot 42 \times EE}{1 \times 2 \cdot E}$ $\frac{15 \cdot 12 \cdot 2 \times 2 \cdot EE}{1 \times 2 \cdot E}$ $\frac{15 \cdot 12 \cdot 2 \cdot EE}{1 \times 2 \cdot EE}$ $\frac{16 \times 100 \times 100}{1 \times 100}$ $\frac{16 \times 100}{1 \times $
Meter Kind & Size <u>ROCKWEII</u> <u>2200</u> Regulator Location <u>INSIDE</u> Regulator Kind & Size <u>FISH</u> et <u>S302</u> <u>ORFACE 76</u> <u>(14005800)</u> Regulator Lock Up.= <u>(12")</u> <u>INLET(29")</u> <u>ORFACE 76</u> <u>(12" we)</u> Relief Valve Size & Condition. <u>FNTEENAL EETLEF</u> Relieved At. What Pressure <u>NA Sour 5-5-99</u> <u>Buller</u> Corrections Needed or Important Notes: <u>New DS VENT Line RePLACED TT</u> IS <u>12</u> <u>Need</u> To BE <u>1</u> ". <u>Remove</u> <u>289</u> <u>H</u> <u>Relief VALVE LeAVING OFF</u> FISHER Req. HAS <u>INTERNAL Relief</u> <u>NO NEED</u> FOR THE <u>289-H</u> <u>UIII</u> <u>JISCUMNER</u> <u>SUN 105</u>
Regulator Location <u>I~5 ID C</u> Regulator Kind & Size <u>FISM # \$302</u> <u>OLFACE 3%</u> <u>GIUDES RIP</u> Regulator Lock Up.= <u>I2"</u> <u>INLET(29"</u> <u>PUTLET (12" WC</u>) Relief Valve Size & Condition. <u>FATER MALE ENLET</u> Relieved At. What Pressure <u>MA</u> <u>Scar 5-5-99</u> <u>Bulon</u> Corrections Needed or Important Notes: <u>Net DS Vent Live RePLACED IT</u> IS <u>V2</u> <u>Need</u> TO <u>DE</u> <u>I"</u> . <u>Remove</u> <u>J89-H</u> <u>Relief VALVE LeAKing OFF</u> FISHER Reg. HAS <u>INTERNAL</u> <u>Relief</u> <u>NO</u> <u>Need</u> FOR THE <u>289-H</u> <u>UILL</u> <u>JISCOWNDER</u> <u>SUN 105</u>
Regulator Kind & Size FISH & S302 OPACE 38 (14403R1- Regulator Lock Up.= (12") NLET (29") PLITET (12" WE Relief Valve Size & Condition. INTERME ENTER Relieved At. What Pressure N/A SOAR 5-5-99 Selow Corrections Needed or Important Notes: Nev DS VENT Live REPLACED IT IS 12 NCED TO DE 1". REMOVE J89.41 Relief VALVE LEAKING OFF FISHER Reg. HAS INTERMA Relief. NO NEED FOR THE 289.4 WHIL DISCUMMERT SUN 1005 /
Regulator Lock Up.= (12") MLET (29") QUITLET (12" NC) Relief Valve Size & Condition. <u>INTERMAL</u> <u>Enlet</u> Relieved At. What Pressure <u>NA Sour 5-5-99</u> <u>Bulow</u> Corrections Needed or Important Notes: <u>Nev DS VENT Line</u> <u>RePLACED IT</u> IS <u>N2</u> NGED TO BE <u>1</u> ". <u>Remove</u> <u>289.11</u> <u>Relief VALVE LERVING OFF</u> <u>FISHEE Reg. HAS INTERMAL PRIVET. NO NEED FOR THE 289.11</u> <u>INTERMAL PRIVET</u> <u>SUNVICE</u>
Relief Valve Size & Condition. <u>INTERNAL ENTER</u> Relieved At. What Pressure <u>NA Scar 5-5-99</u> <u>Selon</u> Corrections Needed or Important Notes: <u>NeeDS VENT Live REPLACED IT</u> <u>15 1/2 NCED TO BE 1". REMOVE. 289.41 Relief VALVE LEAKING OFF</u> <u>FISHER Reg. HAS INTERNAL Relief. NO NEED FOR THE 289.4</u> <u>INTERNAL RELIEF SON ICS</u> <u>5-5-99</u>
Relieved At. What Pressure <u>NA</u> <u>Scar</u> <u>5-5-99</u> <u>Below</u> Corrections Needed or Important Notes: <u>NeeDS VENT Line RePLACED IT</u> <u>IS 12 NEED TO DE 1°. REMOVE J89-H RelieF VALVE LEAKING OFF</u> FISHER Reg. HAS INTERNAL RelieF. NO NEED FOR THE 289-H <u>WHIL</u> <u>DISCUMNER</u> <u>SUNJES</u>
Corrections Needed or Important Notes: <u>NeeDS VENT Line REPLACED IT</u> <u>IS 12 NEED TO BE 1". REMOVE. 289-H Relief VALVE LEAKING OFF</u> <u>FISHER Reg. HAS INTERNAL RELIEF. NO NEED FOR THE 289-H</u> <u>LULU</u> <u>JISCUMNERT</u> <u>SOW</u> <u>S-5-99</u>
Corrections Needed or Important Notes: Nee DS VENT Live REPLACED IT 15 12 NEED TO DE 1". REMOVE. 289-H Relief VALVE LEAKING OFF FISHER Reg. HAS INTERNAL Relief. NO NEED FOR THE 289-H WILL DISCUMMENT SUN ICS / 5-5-99
15 12 NEED TO DE 1". REMOVE 289-H RELIEF VALVE LEAKING OFF FISHER Reg. HAS INTERMAN RELIEF. NO NEED FOR THE 289-H [WILL DISCUMMENT SUNJES]
FISHER Req. HAS INTERNAL Relief. NO NEED FOR THE 289-H LULL DISCUMMENT SUN (CS) 5-5-99
[Will Disconnet Sond, cs , 5-5-99
5-5-99
5-5-99
5-5-99
SERVICE WILL BE RETING AN TOOD THACKING
FRANK WH ITTAM
Inspection Completed by. Szack & cululatur Date 128 99

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RICE MAINTENANCE BUILDING

Meter Location Inside-Outside MUTSIDR
Inlet Shut Off Valve Size & Location (inside or out) /" Outsids
Meter Kind & Size Anal 250
Regulator Location outside
Regulator Kind & Size FISHER S 104 ORFILE 516
Regulator Lock Up.= (71~) NLET (99) OUTLOT (7")
Relief Valve Size & Condition. INTERNAL RELIEF
Relieved At. What Pressure NA. Sev 5- 10-99 Relat
Corrections Needed or Important Notes:
5-10-99- ERISTING RECEILETTE WORLD NOT RELACTS
REPLACED RECEILATION WITH LANCASTRA #61
SPRING RATHLY - 44, TO 9' W/L
FOLDS - MANC
licaline . 8" we
RELING 9" NC
FRANK WHITHKE
- WATHING WATHING AND

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MOREHEAD STATE UNIVERSITY REGULATOR, RELIEF INSPECTION DATA

THOMPSON HALL

Meter Location Inside	-Outside OUTSIDE	2	
Inlet Shut Off Valve S	ize & Location (inside	or out) 1/2 OWTER	<u> </u>
Meter Kind & Size	MAL. 1400		
Regulator Location	WTSIDE		
Regulator Kind & Size	243-12 12		DEACH 34
Regulator Lock Up.=	(12.10)) INLET (29#	2 outer (13"We)
Relief Valve Size & C	ondition. <u>NAT</u>		
Relieved At. What Pre	ssure	5000- 5-69	9 Balow
Corrections Needed of		PRING RANGE 6-11	
5-6-99	SPRIAL RAN	65 = 6-14"	NC
, y.	Lock up =	11 M WC	·····
	Firss	10" NC	
	REMAN	JA * KC	
		FARM	e WAITAAU
		·····	
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YEAR LY

WATERFIELD HALL

Meter Locatio	on Inside-Outside	= 7NSID	2			
Inlet Shut Off	Valve Size & L	ocation (inside	or out) <u>2°</u>	na VAL	VE INSID	E
Meter Kind &	Size <u>T.C.</u>	<u>60-6</u>				
Regulator Lo	cation <u>twent</u>	E				
Regulator Kir	nd & Size Am	EICAN 2	455-A		ORFICE	•
Regulator Lo	ck Up.= <u>8</u>	3 () INL	er (291	201	1745 (8.	<u>s")</u>
Relief Valve S	Size & Condition	FATERN	46 DELICE	·		
Relieved At.	What Pressure	NA :	500 -3-1	-99	Beland	
	leeded or Import					TALOOK
1 Yu Dec)	alse Vent	CAUAR ITY "	TU Small	Car		
6.000	Recurr	a Maa	de Dein		7)927	
<u>3-5 7 1-</u>	APC MARY	C Array	no kizic	- 393	ILIII - BR	pique
RECUM	~					· · · · · · · · · · · · · · · · · · ·
5-11-00	INSTALLA	a aller a	the same and some some	14.4	1 - 10 - 00-	
5-10-7-7	Romer 4	-74			Luch of	
_			Set	T"NC	Luch w	8 . MC
RELII C	opus 9"	we.				
			FRANK WK	TRA		

Inspection Completed by. Frank Suthitak _Date 1-27-99

WEATHERBY-LAUGHLIN

Meter Location Inside-Outside OUTSIDE
Inlet Shut Off Valve Size & Location (inside or out) 2" out off
Meter Kind & Size <u>IC</u> 250 B
Regulator Location Outside
Regulator Kind & Size SINGER 1813-0 ORFICE Ve
Regulator Lock Up = (10, ~) INLIST (29*) OUTLET ()
Relief Valve Size & Condition. FNTERNAL Relief
Relieved At. What Pressure NA - 5EE 5-10 - 99 Below
Corrections Needed or Important Notes:
S/10/99 RECULATION RECIEVES AT 21" WC
FERDS 8" WC
Locus up 812° ave
FARTH WAT OFFICE
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MSUPHYSPLANT

MOREHEAD STATE UNIVERSITY REGULATOR, RELIEF INSPECTION DATA

(LAKEWOOD) PERKINS BUILDING

Meter Location Inside-Outside OUTSIDE
Inlet Shut Off Valve Size & Location (inside or out) OUTSIDE 2"
Meter Kind & Size American CASE 80-3 - Romoved
Regulator Location Out SIDS
Regulator Kind & Size Fisher 5-202 ORACE 3-2
Regulator Lock Up = (10.5) INLET (29) OUTLIST ()
Relief Valve Size & Condition TorreeNan Relief
Relieved At. What Pressure N/A 500 6-11-99 Surm
Corrections Needed or Important Notes: DIAL GLASS BROK
Ramond meter) College
Now Rizer
REHEATON RELIEVE AS 22" WE
FRODS 9"NE
FRANK WATTOR

Inspection Completed by Scaled whiteh Date 1-28.99

(LAKEWOOD) HAGAN

Meter Location Inside-Outside Court SIDE
Inlet Shut Off Valve Size & Location (inside or out) 2
Meter Kind & Size Rockwan 750 - Removed
Regulator Location OUTSIDE
Regulator Kind & Size FISHER 202 - SPri-9 6-14" ORFICE 34
Regulator Lock Up = (12.0) NLFT (ag^{*}) outer ()
RelienValve Size & Condition. ATNTERNAL Relien
Relieved At. What Pressure NA 508 5-11-99 Beran
Corrections Needed or Important Notes: New Rizer
15-11-99 REG REZIEVES AT 22" WC.
OUTLUT PRUSING 10"
· ·

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MOREHEAD STATE UNIVERSITY REGULATOR, RELIEF INSPECTION DATA

(LAKEWOOD) HOLBROOK

Meter Location Inside-Outside OUTSIDE	-
Inlet Shut Off Valve Size & Location (inside or out) 2.0 w SIDE	
Meter Kind & Size Poctwell 415 - Remark	
Regulator Location OCT SIDE	
Regulator Kind & Size STOL FISHER Sering -6-14" DEFICUS	
Regulator Lock Up.= (11.0.) INLER (29#) OUTLET ()	
Relief Valve Size & Condition. Internet Relief	
Relieved At. What Pressure NA SEV 5-11-99 Burn	
Corrections Needed or Important Notes: New Rizer	_
5-11-99 - LOCA UP 11 m We Reduris 32" w	<u>'</u> c
FERDS 9.5 IN NC	
FRANCI WAITANA	
	_
	-

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MOREHEAD STATE UNIVERSITY REGULATOR, RELIEF INSPECTION DATA

(LAKEWOOD) 502-504

Meter Location Inside-Outside Outside
Inlet Shut Off Valve Size & Location (inside or out) / Ourside
Meter Kind & Size BOCK WELL IA ~ Removed
Regulator Location Outside
Regulator Kind & Size 5302 FISUCE Sering 6-10" ORFICE 3/4
Regulator Lock Up. = (10,5.) INLET (29#) OUTLET ()
Relief Valve Size & Condition. INTERNAL Relief
· · · · · · · · · · · · · · · · · · ·
Relieved At. What Pressure N/A SEL 5-11-99 Below
Corrections Needed or Important Notes: New Rizer
5-11-99
Ricians or 21"
OUTUS PRISINA 81/2" HC
FRANC WHITSPER

Inspection Completed by Frank Butitakes Date 1-28.99

(LAKEWOOD) 506

Meter Location Inside-Outside Outside
Inlet Shut Off Valve Size & Location (inside or out) / 1/4 Ourside
Meter Kind & Size AMERICAN 30 WIE - Removed
Regulator Location 047 5106
Regulator Kind & Size FISHER Sizer Spirgbild" ORFICE 34
Regulator Lock Up.= (11.5) INLET (24^{4}) OUTLET $()$
Relief Valve Size & Condition. In TERNAL RELIET
Relieved At. What Pressure N/A SEE 5-11-99 BELW
Corrections Needed or Important Notes: <u>New Rizer</u> 5-11-99
RELIVIUS AT 21" NE
Fans AT 9" WE.
Fritonia WHITTHEAL

Inspection Completed by French Multithen Date 1-28.99

Address: LAKE WOOD 508 Meter Location Inside-Outside OLTSIDE Inlet Shut Off Valve Size & Location (inside or out) /" OUT SIDG . Meter Kind & Size American 304 176 Romoved Regulator Location 647 SIDE Regulator Kind & Size FISHER S-302 SAVING 6-14"DEFICE 38 Regulator Lock Up.= (11.0) INLIST (29^H Relief Valve Size & Condition. INTERNAL Relief 502 5-11-99 Bara Relieved At. What Pressure Ma Corrections Needed or Important Notes: New Rizer 21" Wa 5-11-99 RUCHLATVA RELIGION 104 aunt PRESSARY -FARNIE WHITHKO-.

Inspection Completed by Linch Sulfitation Date 1-28 49

(LAKEWOOD) 510-512

Meter Location Inside-Outside Out SIDE
Inlet Shut Off Valve Size & Location (inside or out) 1" Out SIDR
Meter Kind & Size Pockwell 13 - Removed
Regulator Location Out SIDE
Regulator Kind & Size FISILER S-302 SPrim 6-14" ORFICE 34
Regulator Lock Up = (11,2) WLET (29th)OUTLAT ()
Relief Valve Size & Condition. Internel Beiner
Relieved At. What Pressure 16 See 5-11-99 Bezar
Corrections Needed or Important Notes: NUN Rizer
5-11-99 REG. RECIEVES OF 22" WE
OUT LUT PRISINAU = 9" WC
FRANK WAITAN
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Inspection Completed by Frank & Whiteher Date 1- 28-99

(LAKEWOOD) 514-516 Meter Location Inside-Outside Outside Inlet Shut Off Valve Size & Location (inside or out) / Ourside Meter Kind & Size Por Kwell 1A - Removed Regulator Location OUTSIDE Spri May 6-14 ORFICE Regulator Kind & Size Fisher S-302 29 🗰 Regulator Lock Up = (+110) INLET Relief Valve Size & Condition. Int eRNAL Relief BERA Relieved At. What Pressure 555 5-11.99 Corrections Needed or Important Notes: NUW Rizer 5-11-99 Rog RELIEIS 22" We 252.05 9" NC FRANK WARTHIN

Inspection Completed by Frank & whiteker Date 194.97

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(LAKEWOOD) 518-520 Meter Location Inside-Outside Our SIDE Inlet Shut Off Valve Size & Location (inside or out) 1 OUTSIDE Meter Kind & Size Rockwell Removed Regulator Location Oct 5104 6-14 ORFICE 38 Regulator Kind & Size FISHER S-302 (Bering 29 🏴 Regulator Lock Up.= (//, O)Relief Valve Size & Condition. INTERNAL Relief-Sel 5-11-91 Relieved At. What Pressure h Cesan Corrections Needed or Important Notes: New Rizar 5-11-99 -21" WE crittes. 9" N. FRANK NATTAK .

Inspection Completed by Frank & utitaken Date 1-28-99

(LAKEWOOD) ROYALTY HALL

Meter Location Inside-Outside <u>QUTSIUS</u>	
Inlet Shut Off Valve Size & Location (inside or out) ()	TSIDE
Meter Kind & Size Lockwell 750 - Removed	
Regulator Location OLTSIDE	
Regulator Kind & Size FISHER 5-302 (Spring 1:14") ON	EFICE 38
Regulator Lock Up = (11.3) WLET (29#) OUTC	· F ^u T ^u ()
Relief Valve Size & Condition. To TERNAL Relief	

Relieved At. What Pressure Sen 5-5-99 Belan Corrections Needed or Important Notes: Rizer

REE RECIVER AT Ja"NU Frans 81/2" We. FRANK WHITHEM

Inspection Completed by Frank & ushitaken Date 128.99

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(LAKEWOOD) VANSANT BUILDING Meter Location Inside-Outside OUTSIDE Inlet Shut Off Valve Size & Location (inside or out) 2" OUTIDE Meter Kind & Size Rock Well 750 Removed Regulator Location O was SIDE Regulator Kind & Size 5-302 (Sprim Roma 6"14") ORFICE 34 Regulator Lock Up.= (//.7 ...) · INLET (29th Relief Valve Size & Condition. Internal Relief 5-5-99 Below Relieved At. What Pressure____ معک Corrections Needed or Important Notes: New Rizer RELIONS 22° 4/C 5-5-91 sharing WHIMAM nonk Foros 9.

Date 1-28-99 Inspection Completed by Frank Suthitaker

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PAGE 32

(LAKEWOOK) SHADER HALL Meter Location Inside-Outside OUTSIUE OUT SIDE 2. Inlet Shut Off Valve Size & Location (inside or out)_ Meter Kind & Size Cack Well 750 - Romeved Regulator Location OUT SIDE 6-14" DEFICE Regulator Kind & Size 5. 3.02 Serieg OUTLES 24 Regulator Lock Up.= 10.2 INLET Relie E Relief Valve Size & Condition. InTernAL Born 5-5-99 See Relieved At. What Pressure Ň Corrections Needed or Important Notes:____ Nen Rizer 5-5-95 32 " WC. RELIGIE ST 10" NC FERINS Cannk. MAITALLY

Inspection Completed by Frank & whitehu Date 1-28 49

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(LAKEWOOD) PERATT Meter Location Inside-Outside OUT SIDEInlet Shut Off Valve Size & Location (inside or out) 2. OUTSIDE Meter Kind & Size Rockwell 750 - Removed Regulator Location OuTSIDE ORFICE 3/8 6-14" Regulator Kind & Size 5-302 5pring Regulator Lock Up.= (12, 0)1a# DUTLET NLET Relief Valve Size & Condition. Fr Techac Relies 22" WC- Ser 5-5-95) Relieved At. What Pressure N Corrections Needed or Important Notes: Rizer New 22 " WC. 5-5-99 10° NC. x2m 5 FRANK WHI TRAM

Date 1-28-44 Inspection Completed by Jon Sulitation

(LAKEWOOD) HUMPHRE Meter Location Inside-Outside OUT SIDE Inlet Shut Off Valve Size & Location (inside or out) 2" OUTSIDE Meter Kind & Size Rockwell 750 Removed Regulator Location OUT SIDE Regulator Kind & Size 5-302 (Speire L'14") OPACE 3-8 (2) **) INLET) OUTLE'r Regulator Lock Up.= (10, g Relief Valve Size & Condition In Trank AL. Peliok 5-599 Relieved At. What Pressure Bar Sec Corrections Needed or Important Notes: New Riger . 5-599 RECIVES AS 21"We Fresh S 10" WC Engone With TAMA

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MOREHEAD STATE UNIVERSITY REGULATOR, RELIEF INSPECTION DATA

(LAKEWOOD) LEWIS

Meter Location Inside-Outside Out SIDE
Inlet Shut Off Valve Size & Location (inside or out) /1" Outs . DE
Meter Kind & Size Pockwell 750 - Renoved
Regulator Location OGT () DE
Regulator Kind & Size 5:302 (SPIT 6-INT) ORFICE 38
Regulator Lock Up.= (10.5) INLET $(29^{\#})$ OUTLET $($
Relief Valve Size & Condition. Frierran Relief.
Relieved At. What Pressure NW 522 5-11-94 Burn
Corrections Needed or Important Notes: New Rizer
RECULARIA REPLICIS AT 22" NE
OUTUR FRANC 9. 4 MENER NC
George Witman

Inspection Completed by Inche of ulf Taken Date 1-28-99

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MOREHEAD STATE UNIVERSITY REGULATOR, RELIEF INSPECTION DATA

(LAKEWOOD) LAUNDRY

Inspection Completed by Frick Autilation Date 1 28-99

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC COMMISSION CASE NO. 99-071



IN THE MATTER OF:

MOREHEAD STATE UNIVERSITY INVESTIGATION INTO ALLEGED VIOLATIONS OF 807 KAR 5:022, SECTIONS 4(13); 9(13); 10(4); 10(16); 13(9); 14(5)(c); 14(13)(d); 14(21); 14(23), AND 14(25) AND 49 CFR 192.201; 192.375; 192.455; 192.479; 192.615; 192.707; 192.723; 192.739; 192.743; AND 192.747

SUPPLEMENTAL RESPONSE TO MARCH 9, 1999 ORDER

Comes the Respondent, Morehead State University ("MSU"), by counsel, and for its supplemental response to the Order previously entered by the Commonwealth of Kentucky, Public Service Commission (the "Commission"), on March 9, 1999, hereby states as follows:

An informal conference was held on April 22, 1999, at 10:00 a.m. at the Commission's offices regarding the above-referenced matter. Present on behalf of the Commission were Commission Staff Members Dale Wright, Larry Amburgey and David Kinman, as well as MSU representatives Jon Woodall, Esq., Porter Dailey and Joe Planck. A memorandum dated April 26, 1999 was subsequently drafted by Mr. Wright and addressed to main case file 99-071 detailing the substance of the informal conference.

At the conference, MSU agreed to promptly generate a schedule for correction of relief valve problems that were alleged to exist at MSU and which were noted in Moore Pipeline Corrosion Services' inspection. A relief valve correction schedule is attached hereto as Exhibit "A" and incorporated herein by reference the same as if set forth verbatim. All corrections are to be completed by May 7, 1999. The items list in Exhibit "A" to be corrected by MSU staff by May 5, 1999 have in fact been completed. MSU also wants to inform the Commission that it has contracted with Moore Pipeline Corrosion Services to complete pressure testing of all relief valves. This scope of work is to be completed during the month of May, 1999.

A gas system survey is attached hereto as Exhibit "B" and incorporated herein by reference the same as if set forth verbatim. This survey delineates facilities with steel piping in the ground that are required to be cathodically protected or replaced with plastic pipe. Many of these facilities have already been corrected and the schedule specifically states when the remainder of the corrections will be made.

WHEREFORE, MSU respectfully requests that the Commission deem the further corrective actions taken by MSU satisfactory.

RESPECTFULLY SUBMITTED

JOHRA WOODALL MCBRAYER, MCGINNIS, LESLIE & KIRKLAND, PLLC 163 WEST SHORT STREET, SUITE 300 LEXINGTON, KENTUCKY 40507 (606)231-8780 COUNSEL FOR MOREHEAD STATE UNIVERSITY

CERTIFICATE OF SERVICE

This is to certify that the foregoing was served by mailing same, first class mail, postage prepaid, to:

Dale Wright, Esq. Public Service Commission 730 Schenkel Lane P.O. Box 615 Frankfort, KY 40602

Helen C. Helton Executive Director Public Service Commission 730 Schenkel Lane P.O. Box 615 Frankfort, KY 40602

David B. Kenman Gas Utility Investigator Gas Branch Public Service Commission 730 Schenkel Lane P.O. Box 615 Frankfort, KY 40602

on this the $\underline{\underline{5}}^{\underline{n}}$ day of May, 1999.

SEL FOR MØREHEAD TE UNIVERSITY ŚTA

Jaw\morehead\public comm\response

MOREHEAD STATE UNIVERSITY RELIEF VALVE INSPECTION JANUARY 1999

Correction Needed Schedule For Correction

Relief valve full of water	Contractor with Moore Pipeline Corrosion Service to replace 5/7/99	
Need to replace vent	Morehead State University staff to correct by 5/5/99	
Need to replace relief valve	Contracted with Moore Pipeline Corrosion Service to replace 5/7/99	
Need to replace vents	Morehead State University staff to correct by 5/5/99	
Need to install test plug	Morehead State University staff to correct by 5/5/99	
Need to replace vent	Morehead State University staff to correct by 5/5/99	
Need to replace vent	Morehead State University staff to correct by 5/5/99	
Need to replace vent	Morehead State University staff to correct by 5/5/99	
Valve leaking	Contracted with Moore Pipeline Corrosion Service to disconnect 5/7	
Regulator leaking	Contracted with Moore Pipeline Corrosion Service to disconnect 5/7	
Vent too small	Morehead State University staff to correct by 5/5/99	
	Need to replace vent Need to replace relief valve Need to replace vents Need to install test plug Need to replace vent Need to replace vent Valve leaking Regulator leaking	

4/26/99sw

Facility

	EXHIBIT	
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SEITER	А	· · ·
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MOREHEAD STATE UNIVERSITY GAS SYSTEM SURVEY APRIL 1999

FACILITIES WITH STEEL PIPE THAT NEEDS TO BE CATHODICALLY PROTECTED OR REPLACED

Facility

Comments/Schedule For Correction

Alumni Tower **Baird Music** Carter Hall Cooper Hall (Disconnect) East Mignon Hall **Fields Hall Five Duplexes** Ginger Hall (Disconnect) Haggan Hall Holbrook Hall Humphrey Hall Lappin Hall Laughlin (Disconnect) Library Tower (Change Riser) Lloyd Cassity Mignon Hall Mignon Tower (Change Riser) Normal Hall (Change Riser) Nunn Hall Perkins Hall Perratt Hall President's Home Rader Hall Reed Hall Rice Building (Disconnect) Regents Hall (Disconnect) Royalty Hall Shader Hall Vansant Hall Waterfield Hall West Mignon Hall Wilson Hall (Disconnect)

To be corrected by July 2000 To be corrected by July 2000 Corrected - New Risers 4/3/99 To be corrected by June 1999 Corrected - Disconnected 2/19/99 To be corrected by July 1999 Corrected - New Risers 4/3/99 To be corrected by July 1999 Corrected - New Risers 4/3/99 Corrected - New Risers 4/3/99 Corrected - New Risers 4/3/99 To be corrected by July 2000 To be corrected by July 1999 To be corrected by July 1999 To be corrected by July 2000 Corrected - Disconnected 2/19/99 To be corrected by July 1999 To be corrected by July 1999 Corrected - New Risers 4/3/99 Corrected - New Risers 4/3/99 Corrected - New Risers 4/3/99 To be corrected by July 1999 To be corrected by July 1999 To be corrected by July 2000 To be corrected by July 1999 To be corrected by June 1999 Corrected - New Risers 4/3/99 Corrected - New Risers 4/3/99 Corrected - New Risers 4/3/99 To be corrected by July 2000 Corrected - Disconnected 2/19/99 To be corrected by June 1999

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COMMONWEALTH OF KENTUCKY **PUBLIC SERVICE COMMISSION** 730 SCHENKEL LANE POST OFFICE BOX 615 FRANKFORT, KENTUCKY 40602 www.psc.state.ky.us (502) 564-3940 Fax (502) 564-3460

Ronald B. McCloud, Secretary Public Protection and Regulation Cabinet

Helen Helton Executive Director Public Service Commission

Paul E. Patton Governor

April 26, 1999

Hon. Jon A Woodall McBrayer, McGinnis, Leslie & Kirkland, PLLC 163 West Short Street, Suite 300 Lexington, Kentucky 40507

Re: Case No. 99-071

Dear Mr. Woodall:

Attached is a copy of the memorandum which is being filed into the record of the above-referenced case. If you have any comments that you would like to make regarding the contents of the informal conference memorandum, please do so within five days of receipt of this letter. Should you have any questions regarding same, please contact Dale Wright at (502) 564-3940, Extension 235.

Sincerely. Helen C. Helton **Executive Director**

Attachment

INTRA-AGENCY MEMORANDUM

KENTUCKY PUBLIC SERVICE COMMISSION

TO: Main Case File 99-071

FROM: Dale Wright

X

DATE: April 26, 1999

RE: Informal Conference Morehead State University ("MSU") Case No. 99-071

On April 22, 1999, at 10:00 a.m., an informal conference was held in the above-named case at Commission offices. Present on behalf of the Commission was Commission Staff Dale Wright, Larry Amburgey and David Kinman and MSU representatives Jon Woodall, Esq., Porter Dailey and Joe Planck.

On March 9, 1999, MSU filed its response to the Commission's show cause order together with documentation showing that MSU begin immediately to address the violations discovered by Commission Staff during an inspection on December 17, 1998. MSU's good faith effort prior to the Commission's Order dated March 9, 1999 is noted.

The documentation reflected that the issues of key valve inspection and testing, emergency procedures, gas valve reports, and gas leakage were addressed and resolved correctly. The issues concerning gas regulators and relief valves was discussed. Commission Staff noted that many of the regulator relief inspection reports did not indicate at what pressure the regulators would release nor that they had been tested. Other such reports indicated that certain work "needs" to be done. Other miscellaneous violations were discussed and need to be addressed by MSU.

Another issue was employee training. MSU showed proof that a training program sponsored by the Kentucky Gas Association was to be conducted at MSU in early May 1999. Also, MSU indicated that whatever education and training needed would be accomplished.

Case No. 99-071 April 26, 1999 Page Two

1

The Commission Staff wanted the regulator relief issue addressed immediately. The issue of penalty was discussed in terms of an approximate amount of \$2,500. The Commission Staff agrees to attempt to allow the penalty funds to be returned or used by MSU to pay for equipment and training.

It was agreed that MSU would immediately and no later than 10 days from receipt of this memorandum submit to Commission Staff a compliance schedule for review and approval. Upon full compliance by MSU, Commission Staff will conduct a follow up inspection.

cc: Parties of Record



COMMONWEALTH OF KENTUCKY **PUBLIC SERVICE COMMISSION** 730 SCHENKEL LANE POST OFFICE BOX 615 FRANKFORT, KY. 40602 (502) 564-3940

April 5, 1999

Ronald G. Eaglin President Morehead State University W. H. Rice Service Building UPO 831 Morehead, KY. 40351 1689

RE: Case No. 99-071

We enclose one attested copy of the Commission's Order in the above case.

Sincerely, Styphad Beld

Stephanie Bell Secretary of the Commission

SB/sa Enclosure

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

 MOREHEAD STATE UNIVERSITY INVESTIGATION
)

 INTO ALLEGED VIOLATIONS OF 807 KAR 5:022,
)

 SECTIONS 4(13); 9(13); 10(4); 10(16); 13(9); 14(5)(c);
) CASE NO. 99-071

 14(13)(d); 14(21); 14(23), AND 14(25) AND
)

 49 CFR 192.201; 192.375; 192.455; 192.479; 192.615;
)

 192.707; 192.723; 192.739; 192.743; AND192.747
)

<u>ORDER</u>

Morehead State University ("MSU") having moved for an extension of time until April 20, 1999 in which to respond to the Commission's March 9, 1999 show cause Order and to schedule an informal conference and the Commission, finding good cause, HEREBY ORDERS that:

1. MSU's motion for extension until April 20, 1999 is granted.

2. The hearing scheduled for April 6, 1999 is cancelled and an informal conference is scheduled on April 22, 1999 at 10:00 a.m., Eastern Daylight Time, in Conference Room 2 of the Commission's offices at 730 Schenkel Lane, Frankfort, Kentucky.

Done at Frankfort, Kentucky, this 5th day of April, 1999.

By the Commission

ATTEST

Executive Director

COMMONWEALTH OF KENTUCKY **BEFORE THE PUBLIC COMMISSION** CASE NO. 99-071

IN THE MATTER OF:

MOREHEAD STATE UNIVERSITY INVESTIGATION INTO ALLEGED VIOLATIONS OF 807 KAR 5:022, SECTIONS 4(13); 9(13); 10(4); 10(16); 13(9); 14(5)(c); 14(13)(d); 14(21); 14(23), AND 14(25) AND 49 CFR 192.201; 192.375; 192.455; 192.479; 192.615; 192.707; 192.723; 192.739; 192.743; AND 192.747

RECEIVED MAR 3 0 1999 PUBLIC SERVICE

COMMISSION

MOTION FOR EXTENSION OF TIME TO FILE A RESPONSE AND FOR AN INFORMAL CONFERENCE

Comes Morehead State University ("MSU"), by counsel, and hereby moves the Commonwealth of Kentucky, Public Service Commission (the "Commission") for an Order granting MSU an extension of time within which to respond to the allegations contained in the Comprehensive Inspection Report previously prepared by the Commission as well as in the Commission's Order of March 9, 1999. MSU further moves the Commission for an Order scheduling an informal conference in order to discuss the alleged violations at issue in this matter. In support of its motion, MSU states as follows:

MSU has received a copy of the Commission's Comprehensive Inspection Report as well as its Order dated March 9, 1999. In response to the issuance of said Order, MSU has acted in good faith to immediately address the violations alleged to exist. MSU respectfully requests that the Commission grant it an extension up to and including April 20, 1999 within which to file a response to the Commission's Comprehensive Inspection

Report and Order and, further, that it set a date certain upon which an informal conference can be held to discuss the alleged violations at issue.

RESPECTFULLY SUBMITTED

JONA. WOODALL

MCBRAYER, MCGINNIS, LESLIE & KIRKLAND, PLLC 163 WEST SHORT STREET, SUITE 300 LEXINGTON, KENTUCKY 40507 (606)231-8780 COUNSEL FOR MOREHEAD STATE UNIVERSITY

NOTICE

Notice is hereby given that the foregoing motion will come on for hearing at the

convenience of the Public Service Commission.

CERTIFICATE OF SERVICE

This is to certify that the foregoing was served by mailing same, first class mail, postage prepaid, to:

Public Service Commission 730 Schenkel Lane P.O. Box 615 Frankfort, KY 40602

61

Dale Wright, Esq. Public Service Commission 730 Schenkel Lane P.O. Box 615 Frankfort, KY 40602 Helen C. Helton Executive Director Public Service Commission 730 Schenkel Lane P.O. Box 615 Frankfort, KY 40602

David B. Kenman Gas Utility Investigator Gas Branch Public Service Commission 730 Schenkel Lane P.O. Box 615 Frankfort, KY 40602

on this the 29th day of March 1999. COUNSELLFOR MOREHEAD STATE UNIVERSITY

Jaw\morehead\public comm\extension of time

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC COMMISSION CASE NO. 99-071

IN THE MATTER OF:

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MOREHEAD STATE UNIVERSITY INVESTIGATION INTO ALLEGED VIOLATIONS OF 807 KAR 5:022, SECTIONS 4(13); 9(13); 10(4); 10(16); 13(9); 14(5)(c); 14(13)(d); 14(21); 14(23), AND 14(25) AND 49 CFR 192.201; 192.375; 192.455; 192.479; 192.615; 192.707; 192.723; 192.739; 192.743; AND 192.747

RECEIVEL MAR 2 9 1999

MOTION FOR EXTENSION OF TIME TO FILE A RESPONSE AND FOR AN INFORMAL CONFERENCE

Comes Morehead State University ("MSU"), by counsel, and hereby moves the Commonwealth of Kentucky, Public Service Commission (the "Commission") for an Order granting MSU an extension of time within which to respond to the allegations contained in the Comprehensive Inspection Report previously prepared by the Commission as well as in the Commission's Order of March 9, 1999. MSU further moves the Commission for an Order scheduling an informal conference in order to discuss the alleged violations at issue in this matter. In support of its motion, MSU states as follows:

MSU has received a copy of the Commission's Comprehensive Inspection Report as well as its Order dated March 9, 1999. In response to the issuance of said Order, MSU has acted in good faith to immediately address the violations alleged to exist. MSU respectfully requests that the Commission grant it an extension up to and including April 20, 1999 within which to file a response to the Commission's Comprehensive Inspection Report and Order and, further, that it set a date certain upon which an informal conference can be held to discuss the alleged violations at issue.

RESPECTFULLY SUBMITTED JONA. WOODALL

MCBRAYER, MCGINNIS, LÉSLIE & KIRKLAND, PLLC 163 WEST SHORT STREET, SUITE 300 LEXINGTON, KENTUCKY 40507 (606)231-8780 COUNSEL FOR MOREHEAD STATE UNIVERSITY

NOTICE

Notice is hereby given that the foregoing motion will come on for hearing at the

convenience of the Public Service Commission.

CERTIFICATE OF SERVICE

This is to certify that the foregoing was served by mailing same, first class mail, postage prepaid, to:

Public Service Commission 730 Schenkel Lane P.O. Box 615 Frankfort, KY 40602

Dale Wright, Esq. Public Service Commission 730 Schenkel Lane P.O. Box 615 Frankfort, KY 40602 Helen C. Helton **Executive Director Public Service Commission** 730 Schenkel Lane P.O. Box 615 Frankfort, KY 40602

David B. Kenman Gas Utility Investigator Gas Branch **Public Service Commission** 730 Schenkel Lane P.O. Box 615 Frankfort, KY 40602

on this the 20th day of March 1999. COUNSELLFOR MOREHEAD STATE UNIVERSITY

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COMMONWEALTH OF KENTUCKY **PUBLIC SERVICE COMMISSION** 730 SCHENKEL LANE POST OFFICE BOX 615 FRANKFORT, KY. 40602 (502) 564-3940

March 9, 1999

Ronald G. Eaglin President Morehead State University W. H. Rice Service Building UPO 831 Morehead, KY. 40351 1689

RE: Case No. 99-071

We enclose one attested copy of the Commission's Order in the above case.

Sincerely, Skphal See

Stephanie Bell Secretary of the Commission

SB/sa Enclosure

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

)

In the Matter of:

MOREHEAD STATE UNIVERSITY

INVESTIGATION INTO ALLEGED VIOLATIONS OF 807 KAR 5:022, SECTIONS 4(13); 9(13); 10(4); 10(16); 13(9); 14(5)(c); 14(13)(d); 14(21); 14(23), AND 14(25) AND 49 CFR 192.201; 192.375; 192.455; 192.479; 192.615; 192.707; 192.723; 192.739; 192.743; AND 192.747

CASE NO. 99-071

<u>ORDER</u>

Morehead State University ("Morehead") is a master meter gas system operator which receives its natural gas from Morehead Municipal Gas System. Morehead, as a master meter gas system operator, is subject to the safety jurisdiction of the Commission pursuant to KRS 278.495 and KRS 278.992(1).

KRS 278.495(2) authorizes the Commission to regulate the safety of natural gas facilities comprising a master metering system. Administrative Regulation 807 KAR 5:022 sets, *inter alia*, standards for safety in regard to natural gas facilities. In addition, the Commission enforces the minimum safety standards adopted by the United States Department of Transportation pursuant to the federal pipeline safety laws, 49 U.S.C. § 60101, *et seq.*, and amendments thereto, pursuant to KRS 278.992(1).

On December 17, 1998, Commission Staff conducted a comprehensive inspection of Morehead and, based upon said inspection, Commission Staff on

January 11, 1999, issued a Comprehensive Inspection Report ("Report") [copy attached]. The Report details the discovery of ten violations of 807 KAR 5:022 and 49 CFR 192 as set out for identification purposes in ten numbered paragraphs as follows with the corresponding number as set out in the Report:

1. (No. 7 of Report). There are no calculations available to prove that the relief valves are adequate in size and capacity to prevent over-pressure. 807 KAR 5:022, Section 4(13) and 49 CFR 192.201.

2. (No. 9 of Report). Above ground plastic pipe was found at Nunn Hall Dormitory. 807 KAR 5:022, Section 9(13) and 49 CFR 192.375.

3. (No. 4 of Report). The risers at the Lakewood Apartments marriedstudent area are not cathodically protected. 807 KAR 5:022, Section 10(4) and 49 CFR 192.455.

4. (No. 3 of Report). The risers at Mignon Hall Dormitory show evidence of atmospheric corrosion. 807 KAR 5:022, Section 10(16) and 49 CFR 192.479.

5. (No. 1 of Report). The emergency plan does not establish written procedures to minimize hazards resulting from pipeline emergencies. 807 KAR 5:022, Section 13(9) and 49 CFR 192.615.

6. (No. 2 of Report). The regulator station does not have a sign denoting ownership and a telephone number to call in the event of an emergency. 807 KAR 5:022, Section 14(5)(c) and 49 CFR 192.707.

7. (No. 10 of Report). Leakage was noted at Mignon Hall and Nunn Hall Dormitories. 807 KAR 5:022, Section 14(13)(d) and 49 CFR 192.723.

-2-

8. (No. 5 of Report). The system regulators have not been inspected annually. 807 KAR 5:022, Section 14(21) and 49 CFR 192.739.

(No. 6 of Report). The system relief valves have not been tested annually.
 807 KAR 5:022, Section 14(23) and 49 CFR 192.743.

10. (No. 8 of Report). Key valves are not tested annually. 807 KAR 5:022, Section 14(25) and 49 CFR 192.747.

The Report notes that violations identified in numerical paragraphs 3, 5, 8 and 9 are repeat violations which are identified as violations discovered in a prior Comprehensive Inspection conducted on August 22, 1995.

The Commission, based upon the facts contained in the Comprehensive Inspection Report dated January 11, 1999, finds sufficient evidence to believe that Morehead has failed to comply with the above-identified provisions of 807 KAR 5:022 and 49 CFR 192.

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

1. Morehead shall submit to the Commission within 20 days of the date of this Order a written response to the allegations contained in the Comprehensive Inspection Report.

2. Morehead shall appear on the 6th day of April, 1999, at 9:00 a.m., Eastern Daylight Time, in Hearing Room 1 of the Commission's offices, at 730 Schenkel Lane, Frankfort, Kentucky, for the purposes of presenting evidence regarding the alleged violations above named and of showing cause, if any, why it should not be subject to the penalties prescribed in KRS 278.990(1) and KRS 278.992(1) for the alleged violations.

-3-

3. The Comprehensive Inspection Report dated January 11, 1999 is hereby made a part of the record herein.

4. Any requests for an informal conference with Commission Staff to consider any matter which would expedite the handling or disposition of this proceeding shall be filed with the Commission no later than 20 days from the date of this Order.

Done at Frankfort, Kentucky, this 9th day of March, 1999.

By the Commission

ATTEST:

Executive Director

COMMONWEALTH OF KENTUCKY PUBLIC SERVICE COMMISSION

COMPREHENSIVE INSPECTION REPORT

MOREHEAD STATE UNIVERSITY Morehead, Kentucky

January 11, 1999

BRIEF

A comprehensive inspection of the natural gas system of the Morehead State University ("Morehead") was conducted on December 17, 1998. This inspection was conducted in accordance with the Public Service Commission's ("PSC") policy of inspecting all jurisdictional operators. Natural gas operators are jurisdictional to the PSC under KRS 278.040, 278.495 and also through a 5(a) Agreement with the United States Department of Transportation, Office of Pipeline Safety, for the enforcement of the Natural Gas Pipeline Safety Act of 1968.

INSPECTION

Assisted by Mr. Joe Planck, Director of Physical Plant, and Mr. Todd Thacker, Maintenance Superintendent, a comprehensive inspection was conducted on December 17, 1998. Morehead is a master meter gas system receiving its gas through the Morehead Municipal Gas System. Morehead distributes its gas through a network of plastic and steel gas lines at approximately 20 pounds per square inch gauge to numerous housing units, dorms and classrooms for various purposes including cooking, heat, and hot water.

A master meter system is defined in 49 CFR Part 191.3 as a pipeline system for delivering gas within, but not limited to, a definable area such as a mobile home park,

housing or apartment complexes where the operator purchases gas from an outside source for resale through a gas distribution system. The gas distribution pipeline system supplies the ultimate consumer who either purchases the gas directly or through other means, such as rent.

The intent of this inspection and subsequent inspections of other master meter operators is to afford the residents of these master meter complexes the same standards of safety that are required by other operators.

During the inspection the Operating and Maintenance and Emergency Plans, leakage survey, corrosion survey, key valve and records were reviewed along with other pertinent records. Visits were made to meters and regulators on the system.

Deficiencies noted during this inspection will be further discussed in the findings section of this report.

FINDINGS

The following deficiencies were noted during the inspection.

1. The emergency plan does not establish written procedures to minimize hazards resulting from pipeline emergencies. 49 CFR 192.615 and 807 KAR 5:022, Section 13(9).

2. The regulator station does not have a sign denoting ownership and a telephone number to call in the event of an emergency. 49 CFR 192.707 and 807 KAR 5:022, Section 14(5)(c).

3. The riser at Mignon Hall shows evidence of atmospheric corrosion. 49 CFR 192.479 and 807 KAR 5:022, Section 10(16).

4. The risers at the Lakewood Apartment area are not cathodically protected.
49 CFR 192.455 and 807 KAR 5:022, Section 10(4).

5. The system regulators have not been inspected annually. 49 CFR 192.739 and 807 KAR 5:022, Section 14(21).

6. The system relief valves have not been tested annually. 49 CFR 192.743 and 807 KAR 5:022, Section 14(23).

7. There are no calculations available to prove that the relief valves are adequate in size and capacity to prevent overpressure. 49 CFR 192.201 and 807 KAR 5:022, Section 4(13).

8. Key valves are not tested annually. 49 CFR 192.747 and 807 KAR 5:022, Section 14(25).

9. Aboveground plastic pipe was found at Nunn Hall. 49 CFR 192.375 and 807 KAR 5:022, Section 9(13).

10. Leakage was noted at Mignon and Nunn Halls. 49 CFR 192.723 and 807 KAR 5:022, Section 14(13)(d).

RECOMMENDATIONS

It is recommended that Morehead:

1. Rewrite its emergency plan with specific instructions for employees to follow in the event of emergencies such as those listed in the regulation cited.

2. Post a sign at the regulator station complete with telephone numbers of the persons to contact in the event of an emergency.

3. Steps must be taken to correct atmospheric corrosion in those areas where it has occurred and to prevent it in other areas.

4. All steel piping in the ground must either be cathodically protected or replaced by plastic pipe.

5. Each pressure limiting station must be tested annually, not to exceed 15 months, to assure that it is in good mechanical condition, and set to operate at the correct pressure. Documentation of these inspections must be maintained.

6. All system relief valves must be tested annually, not to exceed 15 months, in order to assure that they are set at the correct pressures and will operate in the event of an emergency.

7. All relief valves in the system must be sized correctly in order to prove that they will relieve the necessary volumes of gas in the event of a regulator failure.

8. All key valves in the system must be tested annually not to exceed 15 months and documentation must be kept of these maintenance activities.

9. Any aboveground plastic pipe must be buried or replaced with steel pipe.

10. All leakage found on the system must be graded for potential hazard and repaired as required.

It is further recommended that a copy of this report be sent to Morehead directing it to respond by February 5, 1999 with a plan of correction to the cited deficiencies for Commission approval. It should be noted that violations 1, 4, 5, and 6 are repeat violations from a comprehensive inspection of August 22, 1995.

It is further recommended that the Commission initiate a hearing to allow Morehead to show cause why it should not be penalized for failure to comply with the pipeline safety regulations.

Respectfully submitted, men David B. Kinman

David B. Kinman Gas Utility Investigator Gas Branch

